

Omaha Public Power District
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Omaha, Nebraska 68102-2247
402/636-2000

September 1, 1994
LIC-94-0162

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from NRC (L. J. Callan) to OPPD (T. L. Patterson) dated October 29, 1993 (IER 50-285/93-23)
 3. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated November 29, 1993 (LIC-93-0283)

Gentlemen:

SUBJECT: Revisions to Corrective Actions in Reply to a Notice of Violation

In Reference 3, OPPD replied to the Notice of Violation (NOV) transmitted in Reference 2 regarding Radiation Protection (RP) violations. The Omaha Public Power District (OPPD) is revising two corrective actions as committed to in Reference 3, "Corrective Steps That Will Be Taken to Avoid Further Violations." Corrective Action Item No. 2 is being revised to clarify the intent of the commitment. Corrective Action Item No. 6 is being revised to extend the commitment due date as a result of a misinterpretation of OPPD's intention related to establishing performance measures for various departments.

To ensure that individuals are cognizant of proper radiological work practices, OPPD committed to Corrective Action Item No. 2, as follows:

"As a result of this violation, individuals that have completed GET and have not been in the RCA in the prior three months will be required to have an additional briefing on the requirements of their particular Radiation Work Permit. This briefing will include information on dosimetry and dressout requirements. These individuals will also demonstrate the dressout to RP. This will be implemented by December 31, 1993."

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The intent of Corrective Action Item No. 2 was that the completion of General Employee Training (GET), within the previous three months, is equivalent to receiving a Radiological Controlled Area (RCA) entry briefing. It was not the intent of this commitment to require an additional briefing for those individuals who just completed their GET, but have not made an RCA entry within the last three months. This corrective action was implemented by December 31, 1993. However, OPPD supersedes the previous commitment with the following clarification:

"As a result of this violation, individuals will be required to have an additional briefing on the requirements of their particular Radiation Work Permit, unless they have completed GET within the prior three months or have made an RCA entry within the past three months. The briefing will include information on dosimetry and dressout requirements. These individuals will also demonstrate the dressout to RP. This will be implemented by December 31, 1993."

As a result of the violation cited in Reference 2, OPPD committed to Corrective Action Item No. 6, as follows:

"To ensure accountability for RP practices at all levels, Supervisors will have performance measures established relating to their department's adherence to RP practices (contaminations, etc.). This will be completed by April 30, 1994."

The specific violation of RP procedures cited in Reference 2 involved incidents of individuals entering the RCA without proper dosimetry. These particular incidents are considered poor radiological work practices (PRWP) and, as such, are already included in the Supervisors' performance measures/appraisals in the area of meeting ALARA (As Low As Reasonably Achievable) goals. Currently, the station ALARA goals are not broken down by individual departments, so accountability is primarily with the RP Department. In reviewing the actions that were taken to implement this commitment, management concluded that further actions were necessary to provide more specific performance measures for Supervisors.

The scope of this commitment now includes establishing performance measures for various individual departments in the Nuclear Services Division, Production Engineering Division and the Nuclear Operations Division. Thus, to emphasize proper radiological work practices and accountability, the station PRWP goal will be appropriately divided among departments as established performance measures.

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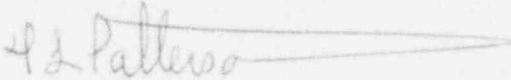
The new or revised goals for PRWPs require review and approval by the station ALARA Committee as well as the executive Radiological Practices Oversight Committee. Therefore, to allow for proper review, OPPD has extended the completion of enhancing ALARA goals by establishing department performance measures for adhering to RP practices to September 30, 1994. Thus, Corrective Action Item No. 6 is superseded with the following:

"To ensure accountability for RP practices at all levels, Supervisors will have performance measures established relating to their department's adherence to good radiological work practices. This will be completed by September 30, 1994."

Based on the completed corrective steps taken in Reference 3, as a result of the RP violation, OPPD remains in full compliance.

If you should have any questions, please contact me.

Sincerely,



for W. G. Gates
Vice President

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c: LeBoeuf, Lamb, Greene & MacRae
L. J. Callan, NRC Regional Administrator, Region IV
S. D. Bloom, NRC Project Manager
R. P. Mullikin, NRC Senior Resident Inspector