

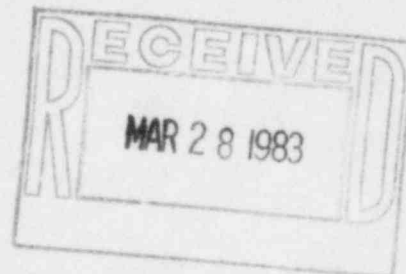
Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4000 AREA CODE 402

March 25, 1983

LIC-83-069

Mr. W. C. Seidle, Chief
Reactor Project Branch 2
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Reference: Docket No. 50-285

Dear Mr. Seidle:

IE Inspection Report 82-27

The subject Inspection Report identified seven open items with respect to the Fort Calhoun Station emergency preparedness program. Attached is the Omaha Public Power District's response to each of the open items. Schedules for resolution of these items are also provided, where applicable.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Mr. L. A. Yandell, NRC
Senior Resident Inspector
Mr. E. G. Tourigny, NRC
Project Manager

OMAHA PUBLIC POWER DISTRICT'S
RESPONSE TO IE INSPECTION REPORT 82-27
APPENDIX B OPEN ITEMS

50-285/8135-05

Item Description

Develop and implement quality assurance procedures to evaluate the effectiveness of the emergency preparedness development training including the professional development program developed for persons assigned emergency preparedness development activities.

Inspection Follow-Up Appraisal

It is recommended that the Quality Assurance audit of the training program include personal interviews to determine training effectiveness.

Response

The District currently verifies and evaluates the effectiveness of its emergency plan training through:

- a) Verification of the adequacy of established training program content and verification of training program implementation through the internal audit process.
- b) Verification of the degree of retention and understanding of training material by trainees through administration of appropriate quizzes, examinations, and practical demonstrations after training is received.
- c) Verification of the adequacy and effectiveness of training received through the conduct, evaluation, and critique of emergency drills including the annual emergency exercise.

The District believes the current program provides adequate means for verifying the effectiveness of emergency plan training. The District feels the process of practical demonstrations, evaluations, and critiques represents an effective form of interview.

50-285/8135-27

Item Description

Evaluate capabilities for meeting the 3-hour sample and analysis time frame if the radiochem lab becomes uninhabitable due to elevated radiation levels.

Inspection Follow-Up Appraisal

The result of OPPD Technical Services evaluation of the equipment indicated that the system may not be operable as a backup unit since the procedures for sample bomb calibration and analysis were not available. There were no established procedures for the transportation of the sample to North Omaha, no transport vehicle available to properly transport the sample, and EOF assigned personnel were not fully trained to calibrate and operate the system. Technical Services has proposed corrective actions for these items to be completed by December 31, 1982. The proposed actions are:

- development of sample transportation procedure
- revision of previously developed calibration procedures
- development of NaI system operating procedures
- training of radiochemical analysis personnel assigned to the recovery organization

Based on the above findings, this item remains open. OPPD should complete the proposed actions and identify a dedicated transport vehicle in the sample transportation procedure. OPPD should also consider upgrading or replacing the present NaI equipment with state-of-the-art automatic spectrum stripping equipment which will accomplish the isotopic analysis within the specified time frame.

Response

The District's Radiological Emergency Response Plan delineates a radioactive sample analysis program whereby Cooper Nuclear Station (CNS) provides the Fort Calhoun Station (FCS) backup laboratory support should the radiochemistry laboratory become unusable during a plant emergency. The District sanctions this sample analysis backup plan and intends to confirm the following three items:

- a) Determine that each computer software library contains the same isotopes. The conformance of major isotopes in both programs is known.
- b) Confirm the workability of FCS's depressurization and delivery method.
- c) Determine that the sample and analysis can be completed within the 3-hour guidance time by an actual drill.

The District will conduct a sample and analysis drill by June 30, 1983 with CNS to confirm these items. If confirmed, detailed procedures for this method, including identification of a dedicated transport vehicle, will be implemented by November 1, 1983.

Earlier correspondence between the Commission and the District indicates a misunderstanding as to what backup plan the District is actively pursuing. The CNS plan is the only plan the District is presently utilizing, developing, and confirming. The District has investigated an available NaI counting system at the North Omaha Power Station as a backup counting facility. Because preliminary investigations have shown that full preparation of this facility to meet the required guidelines would be a lengthy and costly project with an expected completion date of June 1, 1985, the District does not intend to further develop or use this alternative unless unexpected problems prevent confirmation of the CNS plan.

50-285/8135-33

Item Description

The adequacy of the Expanded Support Facilities will remain an open item for future resolution until final plans are prepared and construction authorized by OPPD for those facilities.

Inspection Follow-Up Appraisal

This item is open pending completion of the offsite Emergency Operations Facility and development of the appropriate emergency plans and procedures.

Response

A new Emergency Operations Facility (EOF) was activated at the North Omaha Station site effective February 1, 1983. The NRC Region IV was apprised of the relocation. The Radiological Emergency Response Plan and Emergency Plan Implementing Procedures were revised to describe the operation of the new EOF. This facility contains adequate features for effective emergency response.

The ENS/HPN telephone installation in the EOF by the NRC is in progress and is anticipated within 60 days.

The installation and full operation of the data acquisition system must still be accomplished for both the TSC and EOF. Completion of this system provides full operation of these facilities.

The District's schedule for implementation of the EOF data acquisition system will be addressed in response to ONRR's Generic Letter 82-33, due April 15, 1983.

50-285/8135-37

Item Description

Develop the capability for remote interrogation of the meteorological system by offsite agencies in accordance with Regulatory Guide.

Inspection Follow-Up Appraisal

Since full implementation of the emergency response facilities remains to be completed, this item cannot be closed at this time.

Response

Incorporated into the development of the emergency response facilities (ERF) computer system are provisions for meteorological hardware and software associated with dose assessments. Normal access to the system will be at the EOF, TSC, and CR. Remote interrogation of meteorological parameters from the Nebraska and Iowa Emergency Operating Centers is also planned for the system. Final design of the ERF computer system is in progress with installation and operation to occur in coordination with future refueling outage periods. The District's schedule for implementation of the ERF computer system will be addressed in response to ONRR's Generic Letter 82-33, due April 15, 1983.

50-285/8135-47

Item Description

Develop and implement adequate procedures to provide forms for the documentation of emergency radiological survey results.

Inspection Follow-Up Appraisal

EPIP-EOF-18 covers offsite radiological surveys and contains a "form" that is responsive to offsite surveillance needs. However, no similar "form" is available specifically for out-of-plant (onsite) emergency radiological survey results.

Response

A separate reporting form will be prepared and implemented for data collected by the onsite/out-of-plant monitors. These forms will be included in either the present procedure, EPIP-EOF-18, or a new procedure, designated EPIP-OSC-13. The new survey result form for onsite/out-of-plant data will be implemented by July 1, 1983.

50-285/8135-50

Item Description

Correct the OI-PAPs and CMPs to include provisions for labeling, storage, and disposition of sample.

Inspection Follow-Up Appraisal

It is concluded that if CMP-2 is to be used as an instruction for emergency sampling, specific guidance on storage and disposition should be included. Otherwise, the applicable OI-PAPs should be revised to include such information. Additionally, if CMP-2 is to be used as part of the post-accident sampling procedure, it should be referenced in the applicable OI-PAPs.

Response

The Supervisor - Chemistry & Radiation Protection and the Manager - Radiological Health & Emergency Planning have evaluated the options for effective procedural control for sample storage and disposal guidance. They concluded that the Operating Instruction of post-accident procedures is the optimum placement for these provisions.

Procedures OI-PAP-1 through OI-PAP-9 will be reviewed and revised as needed by C/RP personnel. The review will emphasize incorporation of provisions for storage, labeling, and appropriate precautions. Review and revision of OI-PAP-1 through OI-PAP-9 is scheduled for completion by June 1, 1983.

50-285/8135-52

Item Description

Take measures to assure habitability of an adequate sample analysis facility under severe accident situations.

Inspection Follow-Up Appraisal

This item remains open pending completion of the actions discussed in Item 50-285/8135-27 of this report.

Response

Information in response to this item is identical to the response to Item 50-285/8135-27.