

OPPD

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October 19, 1994  
LIC-94-0197

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 August 25, 1994 (50-285/94-99)

Gentlemen:

Subject: Systematic Assessment of Licensee Performance (SALP) Report  
(Inspection Report 50-285/94-99)

On September 19, 1994 Omaha Public Power District (OPPD) met with NRC management to discuss the results of the Systematic Assessment of Licensee Performance (SALP) report for Fort Calhoun Station (FCS). At that time, OPPD provided verbal comments on the SALP Report recommendations.

OPPD will continue to proactively implement enhancements in the various SALP functional areas by continuing implementation of the Operations Performance Enhancement Program and monitoring results of effectiveness. In the corrective action program area, OPPD will be implementing the newly created Corrective Action Group (CAG) which is meant to centralize the various corrective action systems at FCS and thus improve its overall effectiveness. In addition, OPPD has established a Process Enhancement Plan (PEP) in the Engineering area that is tasked with identifying improvements that will ensure that any declining performance trends are reversed, and excellence in this group is maintained. OPPD has prepared written responses to the SALP report comments and provides them as an attachment to this letter.

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If you should have any questions or comments concerning these responses, please contact me.

Sincerely,

*W. G. Gates*

W. G. Gates  
Vice President

WGG/gmc

Attachment

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

## PLANT OPERATIONS

### **NRC Comments:**

- Weakness in Corrective Action Program implementation noted because of several separate corrective action processes with divided ownership.
- Additional efforts are needed to ensure that the corrective action program is consistently utilized at all levels within the organization.
- Decline in routine operator performance.
- Management has not made their operations performance enhancement program expectations clearly known.
- Operators at times demonstrated casual procedural adherence.
- During certain operational events it was evident that operators had not received consistent supervisory oversight and feedback of management's expectations in this area.
- The OPEP has not been fully effective.

### **OPPD Response:**

Recent NRC inspections at several utilities and at FCS have identified a number of deficiencies in corrective action programs within the industry. While OPPD considered it's programs sound there were indications that the present processes are inefficient and overall effectiveness could be enhanced. This perception was directly related to the fact that there are multiple corrective action systems currently used at FCS. As a result OPPD convened a Process Management Team (PMT) that provided a programmatic evaluation of the processes in place at FCS to identify improvement opportunities.

The improvements that will result from this PMT support a corrective action process that will provide a consistent and streamlined approach. The new process will ensure appropriate actions and management oversight, the proper characterization and prioritization of problems, and will provide for more effective permanent fixes to problems. A vital part of this approach is an improved trend analysis capability. This new program will also provide information that allows for proper prioritization of resources, with special emphasis on identification of adverse trends. The new process will make it easier to report plant problems because only one corrective action system will be in use

**PLANT OPERATIONS (Continued)**

and the new system will have greater visibility. In addition, this new program will ensure widespread use by providing continuing education for plant personnel on use of the new system.

At the end of 1993 and the beginning of 1994 several events occurred that involved Control Room Operations. OPPD identified that licensed operator attention to detail, questioning attitude, and sensitivity to critical evolutions had to be improved. OPPD developed the Operations Performance Enhancement Program (OPEP) to take immediate actions to address these issues and help improve overall personnel performance.

Following the implementation of the OPEP, two self-assessments were performed by a multi-disciplined review group with varying degrees of operational experience. The assessments were performed six weeks and six months after implementation of the OPEP. The purpose of the assessments were to help quantify the success of the completed corrective actions and provide recommendations for further improvement. Assessment team conclusions were based on observations of performance over a one week period. One conclusion reached by the assessment team is that the Operations department performance, especially performance within the Control Room had improved noticeably during the two assessment periods. Areas with the most improvement were the communications between Control Room operators, coordination/communication between the Operations Control Center (OCC) and the control room staff, and the questioning attitude of the control room staff. However, the assessment did indicate that the non-licensed operator performance levels had not improved as significantly as the observed performance within the Control Room during the same assessment period, although an overall improving trend in performance was noted.

To make further improvements in this area management expectations regarding ownership of plant activities and procedures is being emphasized through additional management oversight and the ongoing observation program. Additionally, to help identify other corrective actions and to minimize operator errors in the future, OPPD has increased the licensed and non-licensed operator participation and involvement in the OPEP process in order to provide a broader perspective. The recent operations performance trend has been positive.

## MAINTENANCE

### **NRC Comments:**

- A weakness was noted in the attention provided to balance of plant equipment that has importance to safe plant operations. Of particular note was the lack of timely attention provided to the diesel-driven auxiliary feedwater pump, FW-54.
- Some management expectations for maintenance performance needed to be documented and reinforced.
- Management expectations for maintenance performance could be enhanced.

### **OPPD Response:**

Concerning diesel driven Auxiliary Feedwater Pump FW-54, an Incident Report was written in early 1994 as a result of a leak on an oil drain line. Vibration testing was subsequently conducted, based upon the determination that pump vibration contributed towards the drain line failure. In April 1994, System Engineering formalized a plan to address the vibration concerns. In June 1994, changes were made to the configuration on the FW-54 discharge line to reduce the vibration and a Preventive Maintenance Order was created to trend vibration measurements.

Additionally, FCS contracted with a vendor in June of 1994 to provide recommendations on further actions needed to correct the vibration problems. The vendor recommended three modifications along with some additional minor enhancements. Two of the three modifications are now complete and the final modification is currently being installed. Completion of vendor recommended improvements is expected to ensure reliable operation of FW-54. Upon completion of the ongoing modifications, FW-54 will be run for a 72 hour endurance test to demonstrate its reliability.

A maintenance Process Enhancement Plan (PEP) was formed in early May of 1994. The purpose of this PEP was to address the adverse trend that had been identified in the first quarter 1994 QA Quarterly Trend Report based on increases in corrective action documents involving poor work practices and other negative performance indicator trends. Recently the scope has been expanded to look at the overall maintenance work process. The intent of this expansion of scope is to streamline the required maintenance paperwork and decrease the amount of time it takes in dispatching maintenance craft-persons to the field. Some initiatives currently under review for possible incorporation into the overall program are Minor

**MAINTENANCE (Continued)**

Maintenance Work Orders, the development of a Troubleshooting Plan, and the Routine Maintenance Order.

Related to the prioritization of work on Balance Of Plant (BOP) equipment the new maintenance work prioritization process considers all aspects of plant operation including safety and reliability. This ensures that BOP maintenance which could affect plant reliability is prioritized appropriately.

The current system for prioritization of preventive maintenance has generally been effective, but it may have allowed some BOP preventive maintenance to be prioritized lower than would be desirable. Although the performance indicator for overdue preventive maintenance has consistently remained below goal, the majority of overdue items have been BOP items. The preventive maintenance prioritization process will be reviewed this year to ensure that BOP preventive maintenance is appropriately prioritized based on plant safety and reliability.

The backlog of corrective maintenance workload has remained at or near the 1994 goal of 400 MW0's for the first three quarters of 1994. The emergent work prioritization process and the performance goals for completion of high priority maintenance have been effective in ensuring that corrective maintenance which adversely impacts plant safety, reliability, or operation is completed in a timely manner. Work process improvements within the maintenance department are expected to allow further reductions in the backlog of lower priority maintenance during 1994 and 1995.

In July 1994, the station began scheduling maintenance work in accordance with the newly implemented Integrated Plant Schedule. The new scheduling process integrates equipment rotations, preventive maintenance, surveillance testing, and corrective maintenance into one schedule that minimizes the unavailability of specified equipment. Development efforts are in progress to include other station activities such as modifications into the Integrated Plant Schedule. The expected benefits of the Integrated Plant Schedule are increased equipment availability and improved efficiency of the maintenance work force and other support work groups.

## ENGINEERING

### NRC Comments:

- Attention to detail.
- Use of historical data to evaluate root cause of various events.
- Workload of system engineers. Management attention is needed to assure that they have the time to make routine inspections and walkdowns of systems.
- Some examples of weaknesses in support of the facility were noted.
- A weakness was identified in the corrective action program as a result of not documenting operability considerations for a repaired check valve.
- Design basis program was determined to have a limited scope in relation to the design basis deficiency discovered in the engineered safety feature supervisory relays.
- Some examples of lack of attention to detail with regards to 10 CFR 50.59 evaluations.

### OPPD Response:

FCS has benefitted from enhanced plant and system reliability and reduction of significant plant events as a result of the engineering support provided in the areas of operations, maintenance, and plant support. FCS engineering personnel have demonstrated their ability to manage multiple and diverse technical challenges, and it is the intent of OPPD to continue building on these strengths. Two examples of corrective actions taken were in the areas of Post Modification Testing and the utilization of System Engineers. To enhance the Post modification Testing function, additions were made to the design procedures which now require a review of the functions affected by a modification and assurance that proper testing of all those functions is specified in the modification package. OPPD recently implemented a Post Modification Test Group within the Construction Management department. This group works with the Design Engineering group to specify testing requirements during the design phase, to develop test procedures during construction planning, and to perform Post Modification Testing following construction.



### ENGINEERING (Continued)

OPPD will also continue to monitor the utilization of the System Engineering resource. Management meetings have been held with the System Engineers which provided a forum for management to relay expectations, and for the System Engineers to provide feedback to management. OPPD recognizes the need to ensure that System Engineer direct support to system performance continues at high levels to ensure safe, reliable performance of systems. This support includes ensuring System Engineers can spend sufficient time in the field. OPPD intends to ensure this level of support is not allowed to be eroded by the general system engineering work load and will continue to review for the correct prioritization of tasks and distribution of work. Actions underway to help ensure system engineer time is effectively used to support operations and maintenance include: elimination of biennial reviews and development of multi-disciplined System Performance teams.

In addition to these actions, enhancement of the general engineering functional area is in progress as a result of OPPD's Engineering PEP activities. The Engineering PEP is composed of personnel from Operations, Maintenance, Training, Licensing, and the engineering organization. The team is progressing on initiatives to improve engineering performance in the major areas of;

1. Focusing and controlling work scope,
2. Efficient utilization of engineering resources,
3. Enhancing and streamlining the engineering processes,
4. Measuring and monitoring the performance of the engineering product.

Management will continue to monitor the effectiveness of actions to assure continued safe and economical performance of FCS.

### PLANT SUPPORT

#### **NRC Comments:**

- Management should continue to provide attention to the persisting problems related to poor radiation protection practices, including entering controlled areas without required dosimetry and workers reaching into contaminated areas.



**PLANT SUPPORT (Continued)**

- The operations department should be made a more active participant in ALARA committee meetings.

**OPPD Response:**

OPPD realized that these examples could be indicative of broader issues and as a result early in 1994 established a Radiation Protection Process Enhancement Plan (RPPEP). This RPPEP identified areas for improvement in personnel performance, RP program operations, and management communications. Recommendations from this team are being implemented. OPPD feels that the identified improvements will result in better compliance to RP practices and policies.

OPPD has also redesigned the access and egress control system for the Radiologically Controlled Area (RCA) and installation is nearing completion. Following completion, OPPD will use a system where individuals log themselves into and out of the RCA. This system ensures that individuals will have the required dosimetry that will automatically be "Zeroed" prior to entry, data entry errors will be minimized and the system will ensure that individuals have the authorization to enter an area. This should reduce the frequency of improper entries into the RCA.

In addition, ALARA meetings have been rescheduled to allow attendance by all representatives. This will serve to ensure Operations involvement in ALARA initiatives is maintained.