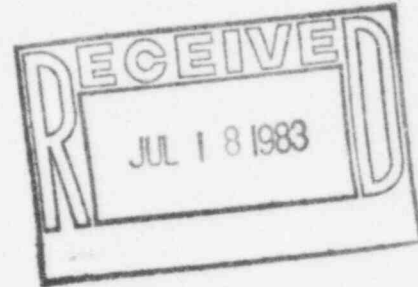


Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

July 5, 1983
LIC-83-163



Mr. W. C. Seidle, Chief
Reactor Project Branch 2
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 100
Arlington, Texas 76011

Dear Mr. Seidle:

Violation Concerning the Annunciator Status
Log, Inspection Report 83-11

During a recent phone conversation with Mr. V. Jaudon of your office, it was agreed that additional information to further clarify the Omaha Public Power District's initial response to the subject violation would be appropriate. The attached revision of our June 17, 1983 response provides information concerning additional established policies for formal review of the Control Room Annunciator Status Log. The changes to our initial response are denoted by vertical lines in the right-hand margin.

Sincerely,

R. L. Jaworski for

W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jp

Attachment

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

Mr. E. G. Tourigny,
NRC Project Manager

Mr. L. A. Yandell, Senior Resident
Inspector

8308030270 830729
PDR ADOCK 05000285
Q PDR

Attachment

OMAHA PUBLIC POWER DISTRICT'S RESPONSE TO NOTICE OF VIOLATION, INSPECTION REPORT 83-11

VIOLATION

Failure to Follow Procedures

Technical Specification 5.8.1 requires that "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirements of Section 5.1 and 5.3 of ANSI N18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33. . . ."

Standing Order G-7 established the Operating Manual and states in Section 1.3 that "adherence to (the) Operating Manual is mandatory."

Standing Order O-40 establishes a procedure for disabling annunciators due to maintenance or operating problems. Section 3.2 states that for each annunciator removed from service "an entry will be made in the Annunciator Status Log," and Section 3.4 states that "when an annunciator is returned to service, the entry in the Annunciator Status Log will be closed out."

Contrary to the above, on April 4, 1983, it was determined that: (1) Annunciator A11-A5L was cleared in the log, but the annunciator card was not in and an open maintenance order (MO) was referenced on the tag; and (2) Annunciators A13-B5U, A2-C3L, and A2-C4L cards were pulled and stickers attached to the alarm windows, but no log entries were made.

This is a Severity Level IV Violation.

RESPONSE

- 1) The corrective steps which have been taken and the results achieved.

At the time the NRC inspector determined that a violation condition existed, he notified the licensee. Immediately, the discrepancies between the Annunciator Status Log and the subject annunciator cards were corrected to ensure compliance with Standing Orders G-7 and O-40. These actions placed the District in full compliance with Standing Orders G-7 and O-40.

- 2) Corrective steps which will be taken to avoid further violations.

A review of the applicable procedures, Standing Orders G-7 and O-40, indicated that they are sufficient to control annunciator status. It appears that the violation is a case of failure on the part of the operations staff to follow plant procedures. Since the applicable procedures provide sufficient control, no procedure changes are warranted. However, a letter has been issued from the Operations Supervisor to the operations staff outlining this Notice of Violation and re-emphasizing the need for strict procedural compliance.

In addition to a review of Standing Orders G-7 and O-40, and the issuance of a reminder letter from the Supervisor-Operations to the Operations staff, the District also has the following established policies for internal audit:

- 1) A quarterly audit of the Control Room Annunciator Status Log is performed by the Supervisor-Operations.
- 2) The plant (Operations) Quality Assurance performs a semi-annual surveillance test to audit the log.

- 3) The date when full compliance will be achieved.

The Fort Calhoun Station is presently in full compliance.