

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

November 11, 1994
LIC-94-0232

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

- References: 1. Docket No. 50-285
2. Letter from NRC (T. P. Gwynn) to OPPD (T. L. Patterson) dated September 14, 1994
3. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated August 1, 1994

Gentlemen:

SUBJECT: Omaha Public Power District Reply to NRC Inspection Report No. 50-285/94-15, Notice of Violation - Request for Additional Information

In the Reference 2 report, the NRC requested additional information concerning the Reference 3 submittal. Attached is the Omaha Public Power District (OPPD) response for the additional information.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Vice President

WGG/grc

Attachment

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

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OPPD RESPONSE TO NRC REQUESTED INFORMATION

- References:
1. Letter from NRC (T. P. Gwynn) to OPPD (T. L. Patterson) dated September 14, 1994
 2. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated August 1, 1994
 3. Letter From OPPD (W. G. gates) to NRC (Document Control Desk) dated March 7, 1994
 4. Letter from NRC (A. B. Beach) to OPPD (T. L. Patterson) dated February 4, 1994

NRC Request No. 1

In paragraph three of the Reference 1 letter, the NRC made the following request:

However, based on our review of your response dated March 7, 1994, to our Notice dated January 4, 1994, we did not find that your response addressed the review of inprocess or completed design change packages and temporary modifications to determine that adequate post-modification testing had been performed. We, therefore, request that you provide an additional response to describe the reviews performed.

OPPD Response

In the Reference 3 Reply to a Notice of Violation, Omaha Public Power District (OPPD) stated that the adequacy of the 1993 Refueling Outage Electrohydraulic Control System (EHC) Engineering Change Notices (ECNs), Maintenance Work Orders, Preventive Maintenance Orders, and Modification Requests were reviewed for similar discrepancies. Consequently, no further problems were discovered.

Additionally, in response to the December 5, 1993 EHC plant trip, the Fort Calhoun Station Design Engineering Nuclear group initiated a review of ECNs completed during the 1993 Refueling Outage. There was a total of 17 ECNs. The purpose of this review was to verify that the modified systems maintained their ability to perform intended design and operating function. This review verified that the modified systems had adequate testing requirements specified. This review was documented in memorandum PED-FC-93-3161 and was completed on December 8, 1993.

NRC Request No. 2

In paragraph four of the Reference 1 letter, the NRC made the following request:

We also request that you clarify the statement in response dated March 7, 1994, with respect to post-modification testing which stated, "OPPD is presently in full compliance based on the completed actions listed above." In your response dated August 1, 1994, additional actions appeared to be necessary to achieve full compliance.

OPPD Response

In the review discussed in OPPD Response to NRC Request No. 1 above, the Modification Preparation Instructions were investigated. It is important to note that the ECN process is only one of three modification processes within the Modification Preparation Instructions (Design Change Package (DCP), ECN and Temporary Modification (TM)). Since it was an ECN which caused the EHC plant trip on December 5, 1993, it was the ECN Modification Preparation Instructions that were investigated. Specifically, Post-Modification Testing (PMT) related to ECNs was thoroughly reviewed. OPPD did not review specific design change packages or temporary modifications at that time; nor was it intended. At the time the Reference 4 Violation was issued, this was not necessary as OPPD was addressing the PMT requirements associated with the ECN process. Since both the DCP and the TM PMT process were procedurally controlled, they were deemed adequate at that time.

With the completion of actions stated in Reference 3, the information above and the additional explanations furnished in the OPPD response to NRC Request No. 1, OPPD is confident that full compliance was achieved as of March 7, 1994.

NRC Request No. 3

In paragraph five of the Reference 1 letter, the NRC made the following request:

. . . There was no data package of documented review and analysis of vibration data in the modification package [TM-94-007] provided to our inspectors.

OPPD Response

In reference to an August 22, 1994 telephone conversation between our Messrs. Geoffrey Cook, Jack Skiles and Richard Jaworski, and the NRCs Messrs. Chuck Paulk

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and Tom Westerman, Mr. Westerman clarified the NRCs position:

The original inspector who raised this issue did not disagree that the measurements had been taken. The point was that the data was not contained in the temporary modification package. Mr. Westerman felt that if OPPD would place the data into the temporary modification package along with the basis for the conclusion, this would be sufficient. All parties to the conversation agreed to this position.

Since that conversation took place, OPPD has added the vibration data into the Temporary Modification TM-94-007, Revision 1 package. Additionally, a basis for the conclusion was also added.