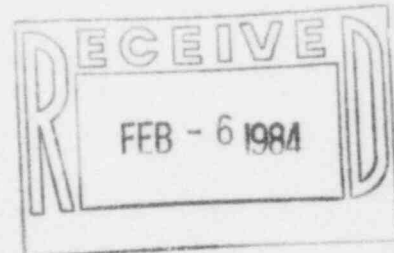


DmB

Omaha Public Power District  
1623 Harney Omaha, Nebraska 68102  
402/536-4000  
February 3, 1984  
LIC-84-037



Mr. Richard P. Denise, Director  
Division of Resident, Reactor Project  
& Engineering Programs  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Denise:

Notice of Violation  
Inspection Report 83-31

The subject report, dated January 5, 1984, identified a violation concerning procedural compliance. Accordingly, please find attached the Omaha Public Power District's response to this Notice of Violation.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Jones". The signature is fluid and cursive, with a long horizontal stroke at the end.

W. C. Jones  
Division Manager  
Production Operations

WCJ/DJM:jmm

Attachment

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

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

8403190061 840308  
PDR ADOCK 05000285  
Q PDR

5006

## Attachment

Based on the results of an NRC inspection conducted during the period of November 14-18, 1983, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982 the following violation was identified:

### Procedural Compliance

Technical Specification 5.11, "Radiation Protection Program," states: "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be . . . maintained and adhered to . . . ."

Radiation procedures are also addressed in your Standing Order T-1, "Radiation Protection Manual," which states: "All station personnel . . . will abide to every provision of the Radiation Protection Manual . . . ."

In addition, Section IV.I.1, "Weekly Review of Standing R.W.P.'s," of Radiation Protection Procedure (RPP)-20, "Radiation Work Permit," which is part of the Radiation Protection Manual, states: "All R.W.P.'s written for a period greater than five working days will be reviewed by a designated individual within the Radiation Protection Group . . . the R.W.P. will be dated and initialed in the space provided."

Contrary to the above, on November 16, 1983, the NRC inspector determined that the licensee had not performed the proper weekly review of approximately 14 Standing radiation work permits for the month of February 1983 and also a similar number for the month of May 1983.

This is a Severity Level V Violation. (Supplement IV)  
(285/8331-01)

### Response

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

Concerning the February, 1983 RWP reviews:

Weekly reviews were not performed on these 14 RWP's because all 14 were terminated before the weekly review was required to be conducted. Therefore, further action is not required concerning the February, 1983 RWP's.

Concerning the May, 1983 RWP reviews:

On November 16, 1983, the date when the missed RWP reviews were identified, an immediate review of radiation, contamination and airborne surveys was conducted for the affected period in May, 1983. This review demonstrated that radiological conditions immediately before, during, and after the missed review period were stable and unchanged, indicating that the protective measures described in the unreviewed RWP's were appropriate. No individual received either excessive or unexpected radiation exposures, contaminations due to improper protective clothing, or internal exposure as a result of improper respiratory protection. The results of this review were provided to the inspector prior to the exit interview.

The RWP program was reviewed and it was determined that the formalized weekly review process on the RWP was redundant to another activity. This activity is the ongoing program of daily, weekly, monthly, and special surveys of radiological conditions within the radiological controlled area. The primary purpose of this program is to assure that the RWP's are changed to reflect changed conditions. The survey process had always resulted in appropriate changes before the administrative weekly review process so that no administrative weekly review resulted in changes to RWP's. The weekly review of Standing RWP's was determined to have neither operational purpose nor administrative value.

Based upon this review and the operational need to improve the RWP system, a procedure change to the RWP form (2C-236) and procedure RPP-20 was completed. The deletion of the administrative weekly review process was included in these changes. In addition, Section 4.0 of the Radiation Protection Manual was revised to clarify that upon completion of routine and special surveys, health physics personnel review these surveys to determine if Standing or Extended RWP's remain adequate. The current system of RWP updates as a result of routine and special surveys continues to assure that the radiological safety of workers is maintained and not reduced. Since the approval of the new RWP system, updates to the RWP's have been made as appropriate. Many improved effects have resulted from these changes.

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

The action previously taken, as described in (1) above, is considered appropriate to prevent a recurrence of the violation.

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

The District is currently in full compliance.