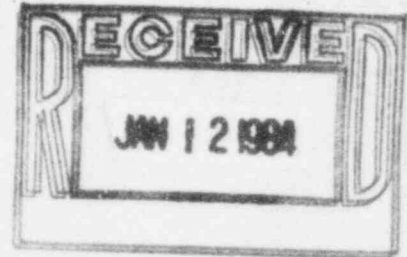


Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

50-285/83-20

January 10, 1984
LIC-84-011



Mr. J. E. Gagliardo, Acting 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. Gagliardo:

Subject: Systematic Assessment of Licensee Performance (SALP)

Omaha Public Power District management met with the SALP Board on December 20, 1983 to review the results of the SALP program as detailed in Inspection Report 50-285/83-28 dated December 14, 1983. The SALP review covered 16 functional areas related to the Fort Calhoun Station operation and design. Inspection Report 83-28 details the findings and performance ratings of each functional area. Additionally, for each functional area, the SALP team has provided recommendations for up-grading District performance in each area. Enclosed is the District's response to each recommendation. The enclosure also addresses specific weaknesses detailed in the report or discussed during the December 20, 1983 meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Jones".

W. C. Jones
Division Manager
Production Operations

WCJ/JJF/lp

Enclosure

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

8404090238 840110
PDR ADOCK 05000285
Q PDR

1E01

11

Attachment

OMAHA PUBLIC POWER DISTRICT'S RESPONSE TO SALP FINDINGS AND RECOMMENDATIONS (BY FUNCTIONAL AREA)

A. PLANT OPERATIONS

Recommendation

Licensee management should continue its active involvement in the Fort Calhoun Station operation. Efforts should be continued to license additional plant supervisors not presently holding an SRO license on the plant.

Response

The District's management intends to continue its active involvement in Fort Calhoun Station operations and plans to continue its practice of licensing additional plant staff supervisors.

B. RADIOLOGICAL CONTROLS

1. Radiation Protection

Recommendation

Attention should continue to ensure that NRC-identified initiatives are closed in a timely manner. Management attention is needed to ensure that a comprehensive ALARA program is implemented.

Response

The District is actively pursuing closing out all open items as discussed in the July, 1983 meeting at Region IV headquarters. The present status of open items indicates that 22 are closed, out of a total of 49, and the remaining items are progressing satisfactorily.

The District is presently studying ways to strengthen the management structure of the chemistry/radiation protection organization, including establishment of ALARA Coordinator and Radwaste Coordinator positions. The ALARA program is presently being reviewed to improve its effectiveness.

B. RADIOLOGICAL CONTROLS (Continued)

2. Radwaste Systems, Effluent Treatment and Releases, and Effluent Monitoring

Recommendation

Attention should be given to the completion of existing open items.

Response

Included in B.1., Radiation Protection.

3. Transportation/Solid Radwaste

Recommendation

Increased management oversight of transportation activities and the development of procedures are necessary to provide adequate guidance to ensure compliance with applicable regulations. Take necessary action to close the nine NRC concerns addressed as open items in NRC Inspection Report 50-285/82-26. Review the existing transportation and solid waste program to ensure that new regulations appearing in 10 CFR 71, 10 CFR 61, and 10 CFR 20.311 have been included in appropriate procedures.

Response

As part of the reorganization of the Chemical & Radiation Protection Department, a Radwaste Coordinator position will be created. In addition, the District has developed and implemented procedures to assure compliance with applicable radwaste transportation regulations.

The internal audit program has been strengthened in this and other selected audit areas through the addition of a technical specialist to the audit team conducting these audits. The District believes these improvements will greatly strengthen the effectiveness of the internal audit program.

4. Confirmatory Measurements, Chemistry/Radiochemistry

Recommendation

Continued effort is necessary to resolve the high number of disagreements associated with gaseous sample analyses. Review of existing calibration procedures and the gaseous sample system is necessary. The licensee should consider obtaining the services of contractor expertise to evaluate their present program.

B. RADIOLOGICAL CONTROLS (Continued)

4. Confirmatory Measurements, Chemistry/Radiochemistry
(Continued)

Response

The District has had a contract chemist onsite working on analytical methods and a split sample program which has freed experienced chemistry workers to deal with the confirmatory measurements open item, including calibration and representative sampling. A recalibration of counting equipment has been performed and will be retested in February, 1984 on receipt of fresh gaseous sources. A consultant with the ability to perform onsite confirmatory measurements is being sought.

A technician training program was initiated in the fall of 1982. Five trainees completed the academic portion of the 3-year program in the fall of 1983. Four trainees were assigned to chemistry/radiochemistry and one to health physics to gain the 2-year technician experience required by ANSI N18.1-1971. Each has completed shift technician qualifications in the applicable area and is currently working on shift with a fully qualified individual. Full qualification for the 5 trainees will be achieved by the fall of 1985.

5. Environmental Surveillance

Recommendation

Initiate action to close identified open items.

Response

Based on the results of NRC Inspection Report 83-27, these items have been closed.

The internal audit program has been strengthened in this and other selected audit areas through the addition of a technical specialist to the audit team conducting these audits. The District believes these improvements will greatly strengthen the effectiveness of the internal audit program.

C. MAINTENANCE

Recommendation

The board recommends that the licensee continue to focus management attention on the update team and the timely completion of this work. Implementation of the maintenance order tracking system should continue.

C. MAINTENANCE (Continued)

Response

Management is currently involved in reviewing the progress of the drawing update team. The November 19, 1982 commitment to the NRC in the area of drawing update was to update by December 31, 1983 safety related, fire protection, and radwaste DCR and MR design packages completed prior to January 1, 1981. This commitment has been met. Currently, 23 non-safety related packages are all that remain to be reviewed to complete the modification package portion of the drawing update task. In addition, the drawing update team will continue to review maintenance orders and will complete this portion of the task by the committed completion date which is 2 months after the end of the 1984 refueling outage (approximately July 1, 1984).

With regard to testing of older design changes that are presented to the plant staff for close-out, the System Acceptance Committee includes in their review of the system the identification of whether the modification has performed satisfactorily in service or whether additional testing is warranted.

The District is actively pursuing the full implementation of a computerized history and maintenance order tracking system. Significant progress has already been made on development of this system and is expected to be completed within the next SALP period.

D. SURVEILLANCE

Recommendation

The board recommends that the licensee continue to exercise strong management control of the surveillance program.

Response

Present efforts in this area will ensure continued strong management control of the surveillance program.

E. FIRE PROTECTION

Recommendation

The licensee management should ensure that fire protection measures required by Appendix R are fully implemented or that the appropriate exemptions be obtained for those areas acceptable to the NRC.

E. FIRE PROTECTION (Continued)

Response

The District has filed for exemption which will close out all Appendix R items. Upon resolution of the requested exemptions, the District believes it will be in full compliance with Appendix R.

F. EMERGENCY PREPAREDNESS

Recommendation

The licensee should complete a thorough generic training program evaluation with careful review by management. Emphasis should be placed on improving the efficacy of practical factors training.

An offsite post accident sampling analysis procedure, meeting the 3-hour limit, should be fully implemented.

The licensee should complete the evaluation of the TSC operation and management and should demonstrate the proper implementation of needed corrective measures during the 1983 emergency preparedness exercise.

Response

During this SALP period, the District has spent a significant amount of time training personnel in their emergency assignments. Part of this training included a study done on practical factors performance of employees to ensure the District that not only did personnel receive training but that they could perform all functions in a proficient manner. This study was completed and the improved performance of individuals was reflected in our recent emergency exercise in December 1983.

The District is actively pursuing the completion of our PASS. Mechanical portions of the system, with the exception of the ion chromatograph, have been installed and the resolution of the problems with the analytical equipment is underway.

The operation and management of the TSC was reviewed and administrative measures adopted to provide better interface with the OSC. The effectiveness of the changes made were demonstrated during the successful 1983 emergency exercise.

During the SALP period, the District also completed construction of a new EOF and officially began operation of this facility on February 1, 1983.

F. EMERGENCY PREPAREDNESS (Continued)

Response (Continued)

The District has devoted much effort to provide offsite emergency analytical capability. The CNS radiochemistry laboratory is being tested as a back-up to the Fort Calhoun Station radiochemistry laboratory.

G. SECURITY AND SAFEGUARDS

Recommendation

The licensee's quality assurance department should give increased attention to the federal regulations applicable to security. Quality assurance attention should be more thorough, complete, and effective in uncovering weaknesses in the security system, procedures, and practices to ensure that a high level of performance is achieved.

Response

The newly established Captain position, created to assist in the overall coordination of the security force, has shown favorable results. The District expects to continue with its present efforts to improve performance of the security force and related groups. Upgraded training has been successfully completed this fall for the security guards.

The Quality Assurance Department has thoroughly researched the Federal Regulations applicable to security and has revised and strengthened the audit checklist in this area. In addition, a technical specialist in the security area has been added to the audit team to enhance the department's ability to become more thorough, complete, and effective in uncovering weaknesses in the security system procedures and practices and to assure that a high level of performance is achieved.

H. REFUELING

Recommendation

Licensee management is encouraged to continue its involvement in the planning of refueling outages, the observation of refueling activities, and the emphasis on adherence to procedures.

Response

The District plans to continue its efforts in maintaining a high degree of effectiveness and management involvement in the refueling operations at the Fort Calhoun Station.

I. LICENSING ACTIVITIES

Recommendation

OPPD should be more aggressive in resolving licensing issues that have been unresolved for a number of years. This will entail more management and technical attention. OPPD should improve the training of licensed operators.

Response

The District intends to continue aggressively pursuing the resolution of the remaining unresolved licensing issues. The resolution of 27 issues during the rating period required extensive management involvement by the District and by the NRC dealing with many difficult and complex issues. The remaining 39 unresolved licensing issues also involve matters which will require a significant effort by the NRC staff and the District. Several of the 39 unresolved issues are scheduled for completion in accordance with information previously provided to the NRC. The remaining issues are awaiting NRC review, approval, or guidance to licensees. The District will continue to provide timely responses to NRC requests in order to expedite the review and resolution of these issues.

Arriving at a resolution of the RETS issue has consumed a considerable amount of personnel resources and the District is anxious to close out this issue in a manner consistent with the resolution of similar items in other areas. The District intends to continue efforts to resolve this issue. We are confident that these efforts, coupled with extensive participation by the NRC staff, will result in a resolution which will ensure that resources are indeed effectively utilized to assure safe and efficient operation of the Fort Calhoun Station and thereby enhance the protection of the health and safety of the public.

The improvement of the licensed operator training program has recently received considerable attention within the District at the plant staff and management levels. The District's plans for assuring improvements in this area are discussed in Section J of this report.

J. TRAINING

Recommendation

Licensee management should implement strong measures to reverse the trend that has been exhibited this evaluation period. Of primary importance is the need to expand the training staff in order to upgrade lesson outlines and

J. TRAINING (Continued)

Recommendation (Continued)

material, to share the classroom/lecture responsibilities, and to provide more individualized attention to trainees with regard to screening, testing, and licensee examination preparation. The poor examination success rate indicates the need for a more careful screening program for license candidates and the capability to evaluate each trainee's progress throughout the process.

Response

The Omaha Public Power District recognizes the need to strengthen the Fort Calhoun Station training program and is committed to developing a strong training organization and programs.

This recognition has resulted in a comprehensive review of the existing training organization and the development of a plan to strengthen the existing organization. The recently developed plan is designed to provide additional resources to the onsite training department and includes provisions to establish an offsite training support group. This plan is currently being reviewed by District management.

In the development of the revised training organization, the District considered the recommendations of the Institute of Nuclear Power Operations (INPO) in the areas of self-evaluations, job and task analyses, training program development, instructor qualification, and other steps ultimately leading to accreditation by INPO. The District is presently completing the self-evaluations for the initial training programs for selected operator positions. Meetings are scheduled with INPO training personnel during the week of January 16, 1984 for a training assistance visit and to review the District's progress and plans for achieving INPO accreditation.

During the past few months, the District has also been involved in reviewing and following the development of NRC regulations related to the selection and training of nuclear power plant personnel. These proposed regulations are being considered in the District's current planning for improvements to training for nuclear plant personnel.

The efforts discussed above involve activities which will ultimately result in significant improvements in the Fort Calhoun Station training programs; however, these improvements will not be achieved immediately. In order to achieve

J. TRAINING (Continued)

Response (Continued)

some immediate improvements in the training programs for licensed operators, the District has 2 personnel from a training consultant organization who are assisting the onsite training department. The availability of these personnel has resulted in substantial improvements to the licensed operator training program.

K. QUALITY ASSURANCE

Recommendation

The licensee management should become more involved with the resolution of these long term problems, and with the implementation of the upgraded QA program. The microfilming of records needs to be completed, with particular attention being given to construction QA records.

Response

The Omaha Public Power District has implemented practices which assure that several levels of management, including senior management, will become more involved with the resolution of Quality Assurance problems and with the implementation of the upgraded QA plan. Senior management is conducting monthly meetings with QA management personnel to review the status of QA related activities.

Major changes in procedures and practices have been instituted in many QA department activities, including documentation of training and conduct of internal audits, which the District believes will greatly enhance the department's performance. The internal audit program, in particular, has been strengthened through the addition of technical specialists to selected audit teams and through improved audit practices and auditor training. These improvements have already been implemented in the radiological controls and security areas. An improved system is currently in effect to provide prompt corrective action response (30 days) and completion including monthly deficiency status reports for tracking purposes, intensified followup activities by responsible departments, and monthly corrective action status meetings with senior management. The District believes these improvements will cause prompt and effective corrective action to occur.

The District believes that new and revised procedures were implemented in a carefully planned, controlled, and prudent

K. QUALITY ASSURANCE (Continued)

Response (Continued)

manner, allowing for necessary personnel training and indoctrination. Some implementation problems attributable to the establishment of major procedural and staffing changes in the QA department over a short period of time, including a 30 percent increase in QA department staffing over the past 2 years, have occurred. QA department and other District management have been extensively and actively involved in the correction of these problems and in the establishment of strengthened procedures and practices. The District believes that the problems addressed within the SALP report have been effectively corrected.

Phase 1 of the District's 2-phase QA program revision was completed in November 1983. This phase included the establishment of the Quality Assurance Department Manual and the cancellation of the superseded Quality Assurance Procedures. Planned improvements and increases in QA program scope have been included in and implemented by these new QA department procedures and in revisions to the procedures and practices of other District departments responsible for activities affecting safety. Phase 2 of the QA program revision includes preparation of a new activities based QA plan, replacing the current QA manual, which will reflect the improvements and changes in the QA program already implemented in the District's procedures. This phase has been substantially completed and the District expects to issue the new QA plan by September 1, 1984. It should be noted that District management at all levels has been, and will continue to be, extensively involved in the development and implementation of the new QA program documents.

L. MANAGEMENT CONTROL

Recommendation

Licensee management is urged to increase their involvement in the areas and situations described above.

Response

The responses to the preceeding sections of this report confirm the District's intention to increase management's involvement in several areas. The District is committed to assuring that performance is improved in the Quality Assurance, training, and radiological protection areas through strong management involvement.