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

February 21, 1992
LIC-92-071R

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

Reference:
1. Docket No. 50-285
2. Letter from NRC (A. B. Beach) to OPPD (W. G. Gates) dated December 10, 1991 (Inspection Report 91-26)
3. Licensee Event Report 91-027 dated December 18, 1991 (LIC-91-0282L)
4. Letter from NRC (R. D. Martin) to OPPD (W. G. Gates) dated January 22, 1992 (Notice of Violation)
5. Licensee Event Report (LER) 91-027, Revision 1 dated January 31, 1992 (LIC-92-046L)

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/91-26
Reply to a Notice of Violation

On November 18, 1991, Omaha Public Power District (OPPD) notified the NRC Senior Resident Inspector at Fort Calhoun Station (FCS) about a series of brief violations of containment integrity requirements during power operation. This occurred while sampling the reactor coolant drain tank through valve WD-1060 and is described in LER 91-027 (Reference 3, subsequently revised in Reference 5). An NRC inspection conducted November 18 through December 3, 1991 resulted in an Inspection Report (Reference 2), an enforcement conference held on December 19, 1991, and a Notice of Violation (Reference 4).

OPPD acknowledges the significance of this event and the associated regulatory concerns. The attached OPPD response to the Notice of Violation details a broad range of corrective actions which address these concerns.

If you should have any questions, please contact me.

Sincerely

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/sel

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
D. L. Wigginton, NRC Senior Project Manager
S. D. Bloom, NRC Project Engineer
R. D. Martin, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector

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Attachment
LIC-92-071R

VIOLATION

During an NRC inspection conducted on November 18 through December 3, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

> 10 CFR Part 50, Appendix B, Criterion XIV requires, in part, that measures be established for indicating the operating status of structures, systems, and components of the nuclear power plant, such as by tagging valves to prevent inadvertent operation.
>
> Fort Calhoun Station Quality Assurance Plan, Revision 1, Section 7.1, paragraph 4.2 requires, in part, that procedures for control of equipment be established to maintain plant safety and to avoid unauthorized operation of equipment. These procedures shall require control measures such as locking or tagging to secure and identify equipment in a controlled status. Instructions which implement these requirements shall be contained in the Standing Orders.
>
> Fort Calhoun Station Standing Order SO-O-44, Revision 11, Section 9.0, requires, in part, that when a locked valve is taken out of its normal locked position, such deviations shall be logged in the Locked Component Deviation Log; that the person acquire the approval of the Shift Supervisor; and that an independent verification that the component has been returned to its normal locked position shall be completed.
>
> Contrary to the above, from October 16 through November 18, 1991, on approximately 20 occasions, normally locked containment isolation valve WD-1060 was taken out of its normal locked position without being logged in the Locked Component Deviation Log, without the approval of the Shift Supervisor, and without an independent verification that it had been returned to its normal locked position being completed.

This is a Severity Level III violation.

RESPONSE

1. The Reason for the Violation

   The root cause of this violation was a lack of formality in setting up the reactor coolant drain tank (RCDT) sampling program. RCDT pump discharge test valve WD-1060 was established as a sample point without a formal review by all departments involved. In addition, insufficient knowledge of the program by various personnel inhibited their ability to identify the containment integrity issue more promptly.

   Other causes included:

   - no approved procedure for the non-routine sampling
   - lack of understanding/training on opening of seal-wire closed valves
   - no labeling of seal-wires on valves

2. Corrective Steps that Have Been Taken and the Results Achieved

A. Standing Order G-87 "Non-Routine Activities Requiring Formalized Plans" has been issued to establish management expectations for the necessity of developing and implementing formal plans before performing significant non-routine activities.

B. A memorandum to key plant personnel was issued establishing management expectations for the proper coordination and implementation of troubleshooting or other minor activities (i.e., those not requiring a formal plan or procedure) that may affect plant operations.

C. Chemistry procedure CH-SMP-MI-0011, "Non-Routine Sampling" has been issued and provides instruction for non-routine liquid sampling that involves operation of plant components when specific approved sampling procedures are not applicable. The Shift Supervisor's permission must be obtained prior to performing non-routine sampling requiring valve manipulation not covered by specific approved sampling procedures. This procedure should ensure that the requirements of Standing Order O-1, "Conduct of Operations" and Standing Order O-44, "Administrative Control for Locking of Components," are followed.

D. Chemistry procedures CMP 2.1, "Grab Sampling" and CMP 2.4, "Primary Sampling System - Normal Operation" were deleted and replaced by several new sampling procedures. The applicable replacement sampling procedures (CH-SMP-PR-0008, CH-SMP-PR-0011) should ensure that when locked valves must be manipulated, the requirements of Standing Order O-44 are followed. In addition, two Post Accident Sampling System procedures (CH-SMP-PA-0001, CH-SMP-PA-0002) referencing a locked valve were similarly revised.

E. A cautionary label for locked valves (including fire protection valves) has been developed and approved by Plant Management. These labels have been ordered and a Maintenance Work Order (MWO 920280) issued to install the labels by the end of the 1992 refueling outage. In addition, tags have been ordered to identify caps that could be removed and result in a violation of containment integrity. These include the caps installed between containment isolation valves and the caps provided to test the containment penetrations.

F. A review of the use of seal-wire on locked valves (particularly "T" handle valves) was completed. This review (and a field walkdown) determined that no locked valves which have a handwheel installed are locked with a seal-wire. Generally, a chain and padlock are used to lock valves with handwheels. Seal-wires are used only on valves with "T" handles. This review also looked at a variety of commercially available locking devices for "T" handle valves and recommended devices from two manufacturers.

G. Training on this event was conducted for Operations, System Engineering, Chemistry, Instrumentation and Control, Construction Management and Maintenance Planning personnel. In addition, overall personnel awareness has been heightened through meetings held by the Senior Vice President, the Nuclear Division Managers, and appropriate department managers, as well as through articles in the company's "Nuclear Notes" publication. Also, this violation response will be distributed to nuclear supervisors.

H. Overview training on "self checking" practices to identify and prevent errors before they occur was provided to Chemistry Department personnel.

3. Corrective Steps that Will be Taken to Avoid Further Violations

Additional corrective actions which will be taken include:

A. Install cautionary labels for locked valves (including fire protection valves) and tags identifying caps that could be removed and violate containment integrity. This will be completed by the end of the 1992 refueling outage.

B. Procure and install locking devices for seal-wire closed "T" handle valves (AC-1133, AC-1134, CH-535, SI-535, SI-375, WD-1060, FW-1006, FW-1007). This will be completed by the end of the 1992 refueling outage, contingent upon successful procurement of the locking devices.

C. Develop lesson plans and provide formal "self-checking" training to Chemistry Department personnel. This will be completed by the end of the 1992 refueling outage.

D. Document lessons-learned information from this event in appropriate departmental initial and continuing training. Lesson plans will be updated prior to utilization no later than August 1, 1992.

E. In addition to the memorandum noted in section 2.B above, a review of applicable FCS Standing Orders will be conducted and appropriate guidance establishing management expectations for troubleshooting or other minor activities not requiring a formal plan or procedure will be incorporated by August 1, 1992.

F. Complete an evaluation of permanent sample points for effluents from the RCDT and Containment Sump by August 1, 1992.

G. The Training Department is coordinating a review of FCS Standing Orders used by appropriate Nuclear Operations Division and Production Engineering Division departments. This review will identify those Standing Orders which may impact the operations of these departments and ensure that they are included in the departments' formal training program. The review will be completed and training provided by September 1, 1992.

H. This reply to the Notice of Violation will be distributed to all nuclear supervisors by March 6, 1992.

4. The Date When Full Compliance Will be Achieved

OPPD is currently in full compliance. All of the remaining corrective actions noted above will be completed by September 1, 1992.