

Omaha Public Power District
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402/636-2000

June 15, 1992
LIC-92-192R

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

References: 1. Docket No. 50-285
2. Letter from NRC (A. B. Beach) to OPPD (W. G. Gates) dated
May 15, 1992

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/92-09 Reply to a Notice of
Violation (NOV)

The subject report transmitted a NOV resulting from an NRC inspection conducted
March 15 through April 25, 1992 at the Fort Calhoun Station. Attached is the
Omaha Public Power District (OPPD) response to this NOV.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/grc

Attachment

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

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REPLY TO A NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted on March 15 through April 25, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Append. C, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, and the Fort Calhoun Quality Assurance Plan, Revision 3, Section 2.1, Paragraph 4.2.1, require, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, on April 12, 1992, an activity prescribed by a documented procedure was not appropriate to the circumstances in that a loss of shutdown cooling for seven minutes resulted from Surveillance Procedure OP-ST-SI-3007 not requiring that a proper electrical lineup be in place before the procedure was performed. An abnormal electrical lineup resulted in a breaker tripping and subsequent loss of shutdown cooling flow control and indication.

This is a Severity Level IV violation.

OPPD RESPONSE

A. The Reason for the Violation

This violation resulted from not reflecting design limitations in policies and procedures for performance of testing with the plant electrical system in an off-normal lineup. Neither specific electrical system requirements in the surveillance procedure nor circuit load and limitation information were readily available to the operators to aid in determining the appropriate loading configuration. Prior to performance of surveillance test OP-ST-SI-3007, Operations personnel expected adequate capacity existed on that part of the electrical system affected by the test.

Other factors that contributed to the violation were:

The Outage Control Center (OCC) did not review/approve the performance of the surveillance test as required.

Several electrical activities were scheduled simultaneously.

The Outage Scheduling Group was not fully effective in monitoring work that was in-progress or completed.

B. Corrective Steps That Have Been Taken and the Results Achieved

OPPD has developed comprehensive corrective actions, as noted below, which will provide additional information to Operations and outage management personnel. This information will allow them to make better decisions about electrical system configuration control.

OPPD has revised Operating Instruction OI-EE-2B (480V System) to include a listing of major 480 volt loads. The listing includes full load amperage expected when the equipment is operating. Also included were the breaker trip setpoints for the 480 volt supply and bus-tie breakers. This information will be used by the operators when the electrical system is in an off-normal lineup and loads are to be added. The instruction also discusses the methodology for making an appropriate decision using the additional data.

The OI revision requires periodic recording of selected current indications when the Reactor Coolant System (RCS) is below 300°F and the 480 volt buses are in an off-normal lineup. Off-normal lineup of the 480 volt buses is permissible only when the RCS is below 300°F. The indications to be recorded include the 4160/480 volt transformer current and the 430 volt bus-tie current. Also, loading limits for the current indications consistent with the breaker trip setpoints were provided. The recorded currents will be compared to limits conservative to the trip setpoints for the feeder breakers. This will keep the operators aware of the margin available for additional loads.

C. Corrective Steps That Will Be Taken to Avoid Further Violations

1. OPPD will revise the lesson plan used to address shutdown risk management to include this event. The revised lesson plan will incorporate a discussion on bus loading concerns associated with off-normal bus configurations. This information will be discussed in initial and requalification operator training. This will increase operator awareness if additional loads are connected to the buses during off-normal lineups. The plan will be revised and training will be completed by October 1, 1992.
2. Outage surveillance tests (ST) involving operation of major 480 volt loads will be revised. Each ST will ensure (via a sign-off) that the Shift Supervisor consults OI-EE-2B for guidance before allowing performance of the ST when the plant is in an off-normal electrical system lineup. These procedure changes will be completed by December 31, 1992.

3. OPPD will evaluate the need for a modification to install meter banding for the 480 volt bus tie ammeters. This modification would improve the operators' ability to recognize when loads approach bus capacity limits. This evaluation will be completed by December 31, 1992.
4. Prior to the 1993 Refueling Outage, OPPD will develop better guidance on controlling and evaluating evolutions during periods of off-normal electrical system lineups and significant electrical system work. The guidance will reflect that provided in the revised 480 volt Operating Instructions. The enhanced OCC policies and procedures will include:

A requirement that all significant evolutions must be coordinated through the OCC.

A policy to evaluate outage periods when schedule changes require or result in multiple evolutions on related systems.

A requirement to evaluate all work/evolutions that are worked outside the current outage schedule.

D. Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance based on the completed actions listed above.