



Omaha Public Power District

444 South 16th Street Mall
Omaha NE 68102-2247

May 17, 1996

LIC-96-0044

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 (L. J. Callan) to OPPD (T. L. Patterson) dated March 4, 1996 (50-285/96-99)

Gentlemen:

Subject: Systematic Assessment of Licensee Performance (SALP) Report
(Inspection Report 50-285/96-99)

On March 14, 1996 Omaha Public Power District (OPPD) met with NRC management and discussed the results of the Systematic Assessment of Licensee Performance (SALP) report for Fort Calhoun Station (FCS). At that time, OPPD provided verbal comments on the SALP Report comments and recommendations.

OPPD will continue to proactively implement enhancements in the various SALP functional areas. OPPD has prepared written responses to the SALP report comments and provides them as an attachment to this letter.

If you should have any questions or comments concerning these responses, please contact me.

Sincerely,

T. L. Patterson
Division Manager
Nuclear Operations

TLP/epm

Attachment

c: Winston and Strawn
L. J. Callan, NRC Regional Administrator, Region IV
L. R. Wharton, NRC Project Manager
W. C. Walker, NRC Senior Resident Inspector

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PLANT OPERATIONS

NRC Comments:

- Routine operations continue to pose challenges to the control room staff.
 - The operations staff did not always exhibit leadership in overall stations operations.
 - Crew interactions were not as precise and formal as those practiced during time critical activities.
 - The operations staff was slow to support and respond to management's efforts to improve performance.
- Problem resolution was protracted or performance was ineffective in certain key areas.
- Little progress was made in implementing the labeling and procedure upgrade programs.

OPPD Response:

Operations management has emphasized, to the operating crews, the expectation that the Operations Department must be the leader in overall station operation both during normal and abnormal conditions. Implementation of a Day Shift Priorities Meeting in the Control Room, led by the Shift Supervisor and attended by the operating crew, Shift RP Technician and Shift Chemist, allows Operations to communicate and emphasize its goals for the shift. The recent appointment of a Supervisor-Operations, who reports to the Manager-Operations and to whom the operating crews directly report, will also help in this area. A primary responsibility of the Supervisor-Operations is to spend a significant portion of his time with the operating crews, both in the plant and in requalification training, to establish consistent performance standards and leadership for the six operating crews. Improved crew performance and leadership are evident and have been confirmed by a recent QA audit and self-assessment of the operations area. Additional emphasis is being placed on the role of the Operations Control Center (OCC) during online activities. This involves ensuring the OCC takes a leadership role in coordinating plant activities with Maintenance and other operations support groups to safeguard the Control Room priorities of safe and reliable plant operation.

To enhance employee acceptance of initiatives to improve performance, Operations Management is communicating the reason(s) for improvement initiatives to the operating crews prior to their implementation. Additionally, before carrying out improvements, ideas from the operating crews

are being solicited, as appropriate, rather than top-down directives being forced on the operating crews. The Supervisor-Operations position will improve performance in this area.

Significant attention is being directed to Operator Work Arounds (OWAs) and Control Room Deficiencies (CRDs). Weekly reviews of the status of open items in these areas are conducted by plant management and/or the PRC. Reducing OWAs and CRDs was one of the highest priorities during the recently completed March 1996 mini-outage. Operations has taken ownership of the OWA and CRD Programs by assigning an Operations Engineer as the coordinator for each of the two programs. In addition, Operations runs the daily emergent work meeting and a part of the daily Plan-Of-the-Day meeting.

Additional resources have been applied to the Operating Instruction (OI) Upgrade Project to ensure the planned completion date of March 1997 is met. The primary reason little progress was made in 1995 was that OI Upgrade Project resources were being used to develop the Lower Mode Functional Recovery Procedures.

The Labeling Program is not an upgrade program. Operations is tasked with maintaining equipment labeling and ensuring that new equipment installed by modifications or ECNs is appropriately labeled. A backlog has existed in the labeling area and recent emphasis has resulted in the hanging of over 600 permanent labels and many temporary labels. Additionally, changes to Standing Order G-21 and other engineering procedures should enhance the control and issuance of new labels due to modifications and ECNs.

MAINTENANCE

NRC Comments:

- There were many shortcomings during the refueling outage and there was a performance decline in the conduct of on-line maintenance during the last few months of the assessment period.
 - During the refueling outage, there were several instances of less than superior performance lapses.
 - During the last 6 months of the SALP period, there were several challenges associated with a lack of attention to detail, performing work which exceeded the scope of the work documents, and performing work without the required work instructions.
 - A reactor trip was caused by licensed operator personnel error during the conduct of a surveillance activity.
- Boric acid leaks and a degraded level of cleanliness in some areas of the plant detracted from the overall good level of material condition and cleanliness.
- There were some instances of inadequate work instructions, particularly those involving troubleshooting.

OPPD Response:

The Maintenance department has completed several corrective actions and is continuing to pursue improvements in the areas of procedural compliance and attention to detail. Small group meetings have been conducted to discuss and emphasize procedural compliance. Additional QC field observations are being conducted to verify procedural compliance. Practical factors training is being developed on self-checking and peer-checking.

To maintain high housekeeping standards, homeowners have been assigned for all plant areas and routine management tours are being conducted.

A comprehensive upgrade of the maintenance planning process was completed in 1995 and maintenance planning personnel have been trained on expectations for the content of Maintenance Work Documents. Routine QC surveillance, planner feedback forms, and supervisory observations are being used to identify work instruction deficiencies and reinforce management expectations.

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planners, using a systematic approach to training, with this revised job analysis has recently been completed. Implementation of this improved training will begin in 1996. Although not currently included in the nuclear industries accreditation process, the program is being maintained to the same high standards as any other accredited training program. Ongoing evaluation and upgrading of the program will continue as management and employee feedback to the training process indicates the need. This feedback process has already begun.

ENGINEERING

NRC Comments:

- There were isolated examples of inattention to detail and delays in communicating pertinent information which detracted from overall performance.
- Additional emphasis on design control is warranted.
- Some shortcomings were noted in bringing corrective actions to a final resolution.
- There were isolated instances where engineering did not communicate relatively important information to affected organizations in a timely manner.

OPPD Response:

Management expectations regarding attention to detail issues have been emphasized using quarterly training and an article in Nuclear Notes. The need for conservative decision making and prompt communications were also emphasized in quarterly training sessions held for engineering support personnel. In the quarterly training session the "CHALLENGER INCIDENT" video was used as a case study to emphasize the importance of proper communication between Engineering and Operations. In addition, with the restructuring and restaffing of the management and engineering staff, the organization has been revitalized. Communication has notably improved because of the flattened organization.

Engineering's emphasis on problem solving has been effectively increased. For example, as of May 1, 1996, the number of Operator Work Arounds has been reduced to 10, and Control Room Deficiencies total 37 (21 require an outage and 16 can be done on-line). A Work Process Control System has been established within the Design Engineering area. The objective is to provide continued timely support for the plant staff without effecting DEN's ability to focus on strategic issues such as aging, maintenance of configuration control, Standard Technical Specifications, etc. System Engineering will continue to play a key role in the resolution of day to day plant problems.

PLANT SUPPORT

NRC Comments:

- There were isolated instances where a lack of attention to detail by radiation workers resulted in access control and other administrative problems.

OPPD Response:

Management continues to focus attention on access control issues and radiation work practices for radiation workers. Although improvements have been noted, the need for continued focus on these issues is being emphasized. Improvements have been made to General Employee Training (GET), which include more emphasis on access control issues and radiation work practices. Other improvements to GET training include:

- Briefing radiation workers on access control issues and radiation work practice issues during the GET session.
- Installing an operating access and egress control system in the GET training laboratory. This will allow hands on training on how to access and egress the Radiation Controlled Area properly.
- Installation of a Personal Contamination Monitor in the GET training laboratory.
- Video taping the GET practical factors session and having the students and instructor evaluate and critique the practical factors session together.

The goal for poor radiation work practices has been reduced by 25 percent for 1996. Continued attention to that goal has been communicated to all station radiation workers through the station newsletter and ALARA meetings.

Management will continue to monitor the effectiveness of actions taken to assure improvements continue on these issues.