Omaha Public Power District
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September 3, 1996
LIC-96-0126

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 (J. E. Dyer) to OPPD (T. L. Patterson) dated August 2, 1996

SUBJECT: NRC Inspection Report No. 50-285/96-04, Reply to a Notice of Violation

The subject report transmitted a Notice of Violation (NOV) resulting from a NRC inspection conducted June 2 through July 13, 1996 at the Fort Calhoun Station (FCS). Attached is the Omaha Public Power District (OPPD) response to this NOV.

If you should have any questions, please contact me.

Sincerely,

T. L. Patterson
Division Manager
Nuclear Operations Division

TLP/ddd

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

96-1913

REPLY TO A NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket No.: 50-285
License No.: DPR-40

During an NRC inspection conducted on June 2 through July 13, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

A. Technical Specification 5.2.e, states, administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions. It also states that deviations from the guidelines shall be authorized by the department manager, plant manager, or their designated alternates.

Standing Order O-1, "Conduct of Operations," Step 6.4.3.A(1), states, in part, that an individual shall not be permitted to work more than 12 consecutive hours (excluding turnover). Step 6.4.3.A(3), states, in part, that an individual shall be limited to a maximum of 72 work hours in any 7 day period. Step 6.4.3.A(4), states, in part, that an individual shall not be permitted to work more than 14 consecutive days.

Step 5.1.2 of Standing Order SO-G-52, states, in part, that an individual that performs safety-related functions shall not be permitted to work more than 24 hours in any 48 hour period (all excluding shift turnover time).

Contrary to the above, the inspectors identified that during the periods of March 15 to March 29, 1996, and from June 6 to June 22, 1996, several individuals in the operations department that perform safety-related functions had exceeded either one or all of the above requirements. The department manager, plant manager or their designated alternate did not authorize the deviations from these requirements.

This is a Severity Level IV violation (Supplement I) (285/96004-01).

B. 10 CFR 50.54(j), requires, in part, that apparatus and mechanisms other than controls, the operation of which may affect the reactivity or power level of a reactor, shall be manipulated only with the knowledge and consent of a licensed operator or licensed senior operator.

Contrary to the above, during the performance of a calibration test on June 2, 1994, instrumentation and control technicians inadvertently diluted the volume control tank with approximately 5 gallons of demineralized water without the knowledge or consent of a licensed

operator or licensed senior operator.

This is a Severity Level IV violation (Supplement I) (285/96004-02).

OPPD Response

These violations were cited separately as Violation A (96004-01) and Violation B (96004-02) respectively. OPPD is providing a separate response to each violation.

Violation "A" Response

1. The Reason for the Violation

Standing Order (SO)-G-52, "Plant Staff Working Hours", was issued in October 1982 and defines the requirements for Operations staff work hours in accordance with Technical Specification 5.2.2.e (incorrectly noted in the violation as Technical Specification 5.2.e). Specifically, SO-G-52 limits working hours, unless authorized by the department manager, plant manager, or their designated alternates, as follows:

- No more than 16 hours straight *
- No more than 16 hours in a 24-hour period *
- No more than 24 hours in a 48-hour period *
- No more than 72 hours in a 7-day period. *

* All of the above working hour limitations exclude shift turnover time.

Revision 5 to SO-O-1, "Conduct of Operations", was issued in June 1992 which implemented a new Section 5.4.3, "Department Work Hours." The SO-O-1 work hours were, in some cases, more restrictive than the SO-G-52 work hours listed above, although paragraph B of Section 5.4.3. of SO-O-1 stated "These guidelines are to be followed to the extent possible." Thus, the SO-O-1 working hours were interpreted by the current Manager - Operations as guidance with SO-G-52 containing the working hours requirements per Technical Specifications.

A review of Operations Department time sheets for the March and June 1996 mini-outages was conducted. This review concluded that Operations personnel, with the exception of three (3) operators during the June 1996 outage, met the work hour requirements of SO-G-52. The reason for this violation was that three operators did not remember the SO-G-52 requirement to work no more than 24 hours in a 48 hour period. Additionally, part of the reason the SO-G-52 requirements were exceeded

was due to radioisotope decay time required in order to allow these personnel to successfully exit the Radiologically Controlled Area. A contributing cause of this violation was that, although Operations Management did verbally emphasize the other working hour restrictions, they did not emphasize the requirement to not work more than 24 hours in a 48 hour period for the March and June outages.

2. **Corrective Steps Which Have Been Taken and the Results Achieved**

a. The three operators involved in this incident have been counseled on the SO-G-52 working hour limitations. This was completed in July 1996.

b. SO-O-1 has been revised to delete the conflict between SO-O-1 and SO-G-52 related to work hours, and it now refers to SO-G-52 as the working hours requirement. This was completed on July 10, 1996.

c. During the current Requalification Rotation, 96-5 (which began July 29, 1996), the Supervisor - Operations is reviewing this violation and the requirements of SO-G-52 with Operations personnel. This Requalification Rotation, 96-5, is currently scheduled to be completed on September 13, 1996.

d. The Manager - Operations issued a memorandum to operations personnel to reiterate the requirements of SO-G-52. Additionally, it stated that each individual is personally accountable for tracking his/her working hours. When appropriate, it is up to the individual to obtain either the department manager, plant manager, or their designated alternates approval prior to exceeding SO-G-52 requirements. This was completed on August 20, 1996.

3. **Corrective Steps Which Will Be Taken to Avoid Further Violations**

No further corrective actions are planned.

4. **Date When Full Compliance Will Be Achieved**

OPPD is currently in full compliance.

Violation "B" Response

1. **Reason for the Violation**

On June 28, 1996 maintenance personnel attempted to calibrate the Post Accident Sample System (PASS) drain collector tank level switch using procedure IC-CP-01-6713, "Calibration of PASS Drain Collector Tank SL-26 Level Switch, LS-6713". While performing this procedure, maintenance personnel contacted the control room requesting information on level changes in the Volume Control Tank (VCT). Control Room personnel then realized that the procedure, as written, would result in a dilution of the VCT. The procedure was not completed due to equipment problems.

A detailed Root Cause Analysis (RCA) was performed to determine the cause of this event. It was discovered that on September 20, 1994 this same procedure was performed to calibrate level switch LS-6713. During the performance of this procedure problems were encountered with the equipment, and the procedure was revised on September 21, 1994 to add a valve (HCV-2575) to the valve lineup to allow the calibration water to be pumped to the VCT. In the RCA, it was determined that this violation resulted from a general lack of knowledge of the PASS, which contributed to an incorrect procedure, which set up a discharge flow path to the VCT.

Additionally, contributing causes were determined to be:

- Insufficient awareness of reactivity issues by the individuals involved in the procedure change which allowed the dilution.

- An inadequate procedure review process and a failure to follow Technical Specification 5.8.2.1 by the engineering personnel involved, resulting in failure to have a cross-disciplinary review.

- A lack of system knowledge by Operations, Craft and Engineering personnel involved.

- An ineffective review of the work document/procedure prior to authorizing the calibration.

2. **Corrective Steps Taken and Results Achieved**

a. Calibration Procedure IC-CP-01-6713, "Calibration of PASS Drain Collector Tank SL-26 Level Switch, LS-6713", was revised to remove the demineralized water flow path back to the VCT. This procedure revision was completed on July 8, 1996. The procedure has been successfully performed since this revision.

b. Forms FC-68, "Procedure/Procedure Change Request", and FC-68B, "Temporary Procedure Change Request", have been revised to include a check-off for whether or not a cross-disciplinary review is required. This was complete on August 2, 1996.

3. **Corrective Steps That Will Be Taken To Avoid Further Violations**

a. Training will be provided to appropriate Operations, Craft, and Engineering personnel on the overall operation, and especially the system interfaces, of the Post Accident Sample System (PASS). This will be completed by April 1, 1997.

b. An assessment of the training previously provided on reactivity management issues will be conducted with the objective of determining whether the staff has adequate sensitivity toward reactivity management and the potential effects of and need to evaluate system interfaces of the PASS. The assessment and any additional training needed will be completed by April 1, 1997.

4. **The date when full compliance will be achieved**

Fort Calhoun Station is currently in full compliance.