



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

JAN 4 1993

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

Omaha Public Power District  
ATTN: W. G. Gates, Division Manager  
Nuclear Operations  
444 South 16th Street Mall  
Mail Stop 8E/EP4  
Omaha, Nebraska 68102-2247

Gentlemen:

SUBJECT: NRC INSPECTION REPORT 50-285/92-20

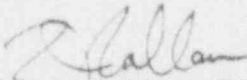
Thank you for your letter dated December 7, 1992, in response to the emergency exercise weakness identified in NRC Inspection Report 50-285/92-20 dated November 2, 1992. Your response detailed your analysis of the weakness and identified as a contributing cause the conflicting assessment criteria contained in your procedures. You also committed to evaluate the conflicting criteria and initiate procedure changes as necessary.

We have reviewed your response and agree with your analysis that Emergency Plan Implementing Procedure (EPIP)-OSC-1, Sections 4.0 and Attachment 6.1 appear to permit different interpretations of conditions challenging the containment fission product barrier. We also agree with your conclusion that under such conditions, the most conservative assessment and classification should have been invoked.

This item will remain open until we have reviewed the results of the procedure evaluations and changes committed to in your response letter.

Should you have any questions concerning this letter, please contact Dr. D. Blair Spitzberg of my staff at (817) 860-8191.

Sincerely,

  
L. J. Callan, Director  
Division of Radiation Safety  
and Safeguards

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PDR ADOCK 05000285  
Q PDR



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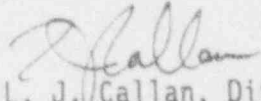
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Division of Radiation Safety  
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JE35

Omaha Public Power District

-2-

cc:

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Nebraska Civil Defense Agency  
1300 Military Road  
Lincoln, Nebraska 68508


Omaha Public Power District

-3-

bcc to DMB (IE35)

bcc distrib. by RIV w/copy of licensee's letter:

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RIV:FIPS <del>DRSS</del>	C:FIPS <del>DRSS</del>	D:DRSS	D:DRP	
DBSpitzberg:nh	BMurray	DLJCallan	ABBeach	
12/24/92	12/24/92	12/24/92	12/29/92	

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

December 7, 1992  
LIC-92-337

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  
November 2, 1992

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/92-20, Response to an Identified  
Weakness

The subject report transmitted an emergency exercise weakness resulting from an  
NRC inspection conducted October 13 through October 16, 1992 at the Fort Calhoun  
Station. Attached is the Omaha Public Power District response to this weakness.

If you should have any questions, please contact me.

Sincerely,

*W. G. Gates*

W. G. Gates  
Vice President

WGG/grc

Attachment

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

DEC 21

Under the specific safety function for Containment Integrity (6.), the following acceptance criteria are presented:

Condition 2: Break Inside Containment

- a. Each Containment penetration not required to be open has at least one isolation valve closed. (ERF pages 560-566).
  - b. Hydrogen concentration  $< 3.0\%$  or Hydrogen Purge in progress.
  - c. Containment Spray flow rate  $\geq 2400$  gpm total or Containment pressure  $\leq 5$  psig.
3. The Emergency Action Level (EAL) in EPIP-OSC-1, "Emergency Classification," which was prompted by an exercise controller was EAL 1.16, which states the following:

FAILURE/CHALLENGE TO TWO FISSION PRODUCT BARRIERS

VERIFICATION CRITERIA:

1. This event is not covered by any other EAL.
- AND
2. The event is a failure or challenge to ANY two (2) fission product barriers listed below (Attachment 6.1).
    - A. Fuel Cladding
    - B. Reactor Coolant System
    - C. Containment
4. Attachment 6.1 of EPIP-OSC-1, states the following for Containment:
- C. Containment Failure or Challenge
    1. Containment Hydrogen Concentration greater than 3%.
    2. Containment Pressure greater than 50 psig OR rising at a rate that will exceed 60 psig before corrective action can halt or reverse the pressure increase.
    3. Containment Integrity as defined by Technical Specifications is not present during an unplanned transient AND the potential exists for loss of one of the other two fission product barriers.

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December 7, 1992  
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c: LeBoeuf, Lamb, Leiby & MacRae  
J. L. Milhoan, NRC Regional Administrator, Region IV  
R. P. Mullikin, NRC Senior Resident Inspector  
S. D. Bloom, NRC Project Manager

DEC 2



## RESPONSE TO AN EMERGENCY EXERCISE WEAKNESS

### WEAKNESS

The inspectors noted a problem with emergency detection and classification when the staff did not promptly recognize that conditions existed for a Site Area Emergency classification. At 9 a.m., the Technical Support Center staff was aware that containment spray and ventilation coolers were lost and that a primary coolant leak existed. These conditions indicated a challenge or loss of the containment and reactor coolant system fission product barriers as defined in EPIP-OSC-1, "Emergency Classification" and, therefore, should have been classified as a Site Area Emergency. At about 9:20 a.m., the Technical Support Center controller issued a contingency message to the Site Director to declare a Site Area Emergency. Failure to promptly classify this event promptly in accordance with the emergency classification procedure was identified as an exercise weakness (285/9220-01).

### Response

Omaha Public Power District (OPPD) has completed a review to determine the cause of the weakness identified during the 1992 NRC Evaluated Exercise on October 16, 1992. The following information was identified:

1. EPIP-OSC-1, "Emergency Classification," Revision 21, Section 4.0 defines a Challenged Barrier as:
  - 4.1 CHALLENGED BARRIER - A challenge to a barrier is defined as one of the following conditions:
    - 4.1.1 Inability to maintain a critical safety function which protects that barrier.
    - 4.1.2 A situation exists which will cause the failure of the barrier within a predictable time period unless successful corrective action occurs.
    - 4.1.3 An event has occurred which has a high probability of having damaged a fission product barrier, but time has not yet permitted verification of the failure.
2. EOP-20, "Functional Recovery Procedure," states the following instructions under Section 7.0, "Safety Function Status Check":

The purpose of this section is to provide a form which enables the operators to continually verify that the actions they are taking are adequate to satisfy the Safety Function Acceptance Criteria. Satisfying the acceptance criteria assures that the actions being taken are maintaining the plant in a safe condition and also verifies by independent assessment (performed by the STA) that the operator has implemented the correct procedure.



Under the specific safety function for Containment Integrity (6.), the following acceptance criteria are presented:

Condition 2: Break Inside Containment

- a. Each Containment penetration not required to be open has at least one isolation valve closed. (ERF pages 560-566).
  - b. Hydrogen concentration < 3.0% or Hydrogen Purge in progress.
  - c. Containment Spray flow rate  $\geq$  2400 gpm total or Containment pressure  $\leq$  5 psig.
3. The Emergency Action Level (EAL) in EPIP-OSC-1, "Emergency Classification," which was prompted by an exercise controller was EAL 1.16, which states the following:

FAILURE/CHALLENGE TO TWO FISSION PRODUCT BARRIERS

VERIFICATION CRITERIA:

1. This event is not covered by any other EAL.

AND

2. The event is a failure or challenge to ANY two (2) fission product barriers listed below (Attachment 6.1).

- A. Fuel Cladding
- B. Reactor Coolant System
- C. Containment

4. Attachment 6.1 of EPIP-OSC-1, states the following for Containment:

C. Containment Failure or Challenge

1. Containment Hydrogen Concentration greater than 3%.
2. Containment Pressure greater than 50 psig OR rising at a rate that will exceed 60 psig before corrective action can halt or reverse the pressure increase.
3. Containment Integrity as defined by Technical Specifications is not present during an unplanned transient AND the potential exists for loss of one of the other two fission product barriers.

5. The FCS Technical Specifications state the following pertaining to containment integrity:

Containment integrity is defined to exist when all of the following are met:

- (1) All nonautomatic containment isolation valves which are not required to be open during accident conditions and blind flanges are closed.
- (2) The equipment hatch is properly closed and sealed.
- (3) At least one door in the personnel air lock is properly closed and sealed.
- (4) All automatic containment isolation valves are operable or locked closed (or isolated by locked closed valves or blind flanges as permitted by limiting condition for operation).
- (5) The uncontrolled containment leakage satisfies Specification 3.5.

The OPPD review identified that by the strict guidance provided in EPIP-OSC-1, "Emergency Classification" (item 4, page 2), the plant conditions did not meet the criteria of a Failure/Challenge to Two Fission Product Barriers. As a result, an escalation to a Site Area Emergency classification was not required.

However, based upon the definition of a challenged barrier in Section 4.1 of EPIP-OSC-1, item 4.1.1 (item 1, page 1), the critical safety function for Containment was not maintained per the requirements of the Safety Function Status Checks in EOP-20 (item 2, page 1). Therefore, this condition could have been considered to be a challenged barrier. This condition, along with a known primary to secondary leak, would have satisfied the requirements of LAL 1.16 (item 3, page 2).

OPPD has determined that these conflicting criteria contributed to the weakness, and proposes to perform a multi-discipline review of the appropriate procedures.

#### Corrective Actions and Schedule

OPPD will convene a review group to evaluate the conflicting criteria discussed above, as well as other EAL criteria currently in use, and initiate procedure changes as necessary. The group will be composed of personnel from areas that typically use the procedures/documents. Training will be provided to affected personnel on any changes initiated by the review process. These actions will be completed by April 16, 1993.