

OPPD

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

May 24, 1985
LIC-85-214

Mr. James R. Miller, Chief
Office of Nuclear Reactor Regulation
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

- References: (1) Docket No. 50-285
- (2) Letter OPPD (W. C. Jones) to NRC (J. R. Miller) dated
November 4, 1983 (LIC-83-267)
- (3) Letter NRC (J. R. Miller) to OPPD dated March 25, 1985

Dear Mr. Miller:

Request for Additional Information
Following Preliminary Staff Review of
Licensee Response to Generic Letter 83-28

The Omaha Public Power District received the subject request for additional information (Reference (3)). This letter requested additional information within 60 days regarding items 2.1 and 2.2.2 of Reference (2). Accordingly, please find attached the District's response to these items.

Sincerely,

J K Sawyer

R. L. Andrews *for*
Division Manager
Nuclear Production

RLA/DJM/rh

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, DC 20036

Mr. E. G. Tourigny, NRC Project Manager
Mr. L. A. Yandell, NRC Senior Resident Inspector

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Request for Additional Information
Following Preliminary Staff Review of
Licensee Response to Generic Letter 83-28

REQUEST

Item 2.1 (first part) - Incomplete

Licensee needs to submit results of work with NPRDS implementation that will confirm completeness of the existing Electrical CQE List. In addition, the licensee should submit the results of their review of applicable procedures and surveillance tests to assure that RTS components are identified as safety-related.

RESPONSE

The District has completed the review of the Reactor Protective System CQE and the NPRDS equipment list. The Electrical CQE List was found to be accurate and complete, and has subsequently been formally issued.

Review of the District's CHAMPS (Computerized History and Maintenance Planning System) database which provides a partial listing of CQE items was completed October 1, 1984. Comparison of the CHAMPS database to the interim CQE list revealed that certain interim CQE list items were not contained in the database. The CHAMPS listing included active items only, passive items such as resistors, fuses, terminal blocks, indicating lights, etc., were not included in the CHAMPS listing. The District contracted with a vendor to collect this additional information and the component information for these additional items was collected, coded on data sheets and the data sheets forwarded to Data Processing for key punching. The key punching has been completed and the independent verification of the additions will be done to ensure that information has been correctly entered into the system. The CHAMPS database will be used to help facilitate the use of the CQE list. The official CQE list is a hardcopy document which provides a basis and listing of CQE equipment.

The District has completed its review of the Reactor Protective System Procedures for adequacy of controls to ensure correct actions are taken with regard to the Reactor Protective System (RPS). This review was conducted in conjunction with a broader review to ensure proper controls as committed to in Item 2.2.1.3 of the District's response to Generic Letter 83-28. The District has found that the existing controls are adequate with RPS activities controlled by Surveillance Tests, which provide acceptance criteria, reporting of problems discovered and review process; Maintenance Orders, which must identify equipment as CQE and which control all repairs including parts and necessary review; and Station Modification Control, which must also identify CQE activities. The only exception to this is RPS light bulbs which are treated and stored as CQE but whose replacement may be done by Operations, as required, or I&C Technicians under preventive maintenance. The District believes that proper training and personnel awareness make this activity acceptable. This approach is consistent with that used for all safety-related activities at the Fort Calhoun Station, and has proven to be an acceptable, safe method of operation.

REQUEST

Item 2.1 (second part) - Incomplete

Licensee needs to submit the results of his efforts to upgrade vendor technical information for reactor trip system components and to establish interfaces with vendors of that equipment to maintain vendor technical information current and complete. Licensee should note comments on NUTAC for Item 2.2.2 in this regard.

RESPONSE

The District has verified with the vendors of the reactor trip system (i.e., the circuit breaker used for manual trip and the contactor used for automatic trip) that the information held by the District is the latest revision and does, in fact, apply to the components used in the District's reactor trip system. Additionally, the procedures used to perform maintenance and testing on these components have been reviewed to ensure they are current. Interface with vendors is discussed in Item 2.2.2 below.

REQUEST

Item 2.2.2 - Incomplete

Licensee needs to present their evaluation of the NUTAC program and describe how it will be implemented at Fort Calhoun. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly the licensee will need to supplement their response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet each element of the Item 2.2.2 concern.

RESPONSE

Item 2.2.2

The District's response dated November 4, 1983 to Generic Letter 83-28, Section 2.2.2, stated that the District was an active participant in the INPO Nuclear Utility Task Action Committee which had been specifically chartered to develop guidance for use by utilities in response to Generic Letter 83-28, Section 2.2.2. Additionally, we responded that we would review NUTAC's report in order to determine to what extent the findings might be incorporated into the District's practices with regard to the control of vendor information for safety-related equipment.

The District has completed its review of NUTAC's Report on Generic Letter 83-28, Section 2.2.2., "Vendor Equipment Technical Information Program" as well as INPO's Good Practice MA-304, "Control of Vendor Manuals." Several meetings have been held with responsible District departments in order to review the current status of vendor information, to discuss various alternatives with regard to the implementation of controls on vendor information and to develop both short and long term goals for the implementation of a final solution. A considerable effort was made to coordinate and fully utilize existing control mechanisms so that the program could be easily integrated into Station activities. In addition, the District has retained the services of an engineering consultant to assist in the development of a vendor manual control program.

Based on the results of our review of the NUTAC Report, INPO's Good Practice and our several meetings, the District has instituted a three (3) phase program which, when fully implemented, will satisfy the concerns of Generic Letter 83-28, Section 2.2.2. The three (3) phase program includes the following:

Phase I

Development and trial testing of vendor information indexing and control procedures. The control procedure fully utilizes the concepts established by NUTAC as well as other means to verify the currentness of vendor information. These procedures will be issued by June 1, 1985.

Phase II

Vendor information received prior to June 1, 1985, will be inventoried and input into the database of CHAMPS. Completion of the indexing process will establish initial control and accountability. The vendor information will then be verified by attempting to contact the supplier.

Vendor information received after June 1, 1985, will be reviewed and approved for use prior to controlled dissemination. This portion of Phase II will be on-going and will not be subject to a completion date.

Phase III

Vendor information received prior to June 1, 1985, and inventoried in accordance with Phase II procedures will be reviewed and approved for use prior to controlled dissemination.

Schedule

The Phase I effort has been essentially completed and will be fully completed by June 1, 1985, when the indexing and control procedures are issued. Phase II activities have been initiated.

A schedule for the completion of the Phase II and Phase III efforts will be provided to the Commission prior to the next scheduled refueling outage. It is anticipated that a more meaningful schedule can be developed after the procedures have been fully implemented and the personnel assigned have had an opportunity to gain experience as to the status of vendor information received prior to June 1, 1985.