

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

February 18, 1993
LIC-93-0019

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 January 19, 1993

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/92-33, Reply to a Notice of Violation (NOV)

The subject report transmitted a NOV resulting from an NRC inspection conducted November 22, 1992 through January 2, 1993 at the Fort Calhoun Station. Attached is the Omaha Public Power District (OPPD) response to this NOV.

OPPD acknowledges that inattention to detail by operations personnel was a contributor to this event. However, two deficiencies in operator aids also contributed to the event. These deficiencies were 1) The control room danger tagging computer contained an error in that there was an incorrect return-to-service position for system interface valve FW-1055; and 2) a danger tagout that had been in place since 1982 to isolate the Steam Generator Blowdown Processing System was incomplete in that two system interface valves were inadvertently left off of the danger tag.

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

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REPLY TO A NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted on November 22, 1992 through January 2, 1993, 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, Appendix 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 or procedures and shall be accomplished in accordance with these instructions or procedures.

Section 4.1.18 of Standing Order SO-O-20 states, in part, that extensive tag outs may require more than one sheet and, in this case, should be thoroughly checked to ensure that nothing has been overlooked. The tag out review shall also include the return to service positions. The shift supervisor, or his designate, will sign the tag sheet to show his review and approval.

Contrary to the above, on December 3, 1992, the licensee failed to comply with the requirements for Standing Order SO-O-20 by performing an inadequate review of Danger Tagout 92-2455, thus failing to identify the incorrect return-to-service valve position for Valve FW-1055. This resulted in the overpressurization of the steam generator blowdown processing system, actuation of the fire suppression deluge dry-pipe system in Room 19, and ultimately creation of a condition that caused the inoperability of motor-driven Fire Pump FP-1A.

This is a Severity Level IV violation. (Supplement I)
(285/9233-01)

OPPD RESPONSE

The Reason for the Violation

The event noted in the violation occurred after performing maintenance on components in the Steam Generator Blowdown System (SGBS). Some components in the Steam Generator Blowdown Processing System (SGBPS) were also affected by the maintenance. Danger Tagout 92-2455 was associated with this maintenance.

The SGBPS was installed under a modification in 1980. Prior to completing the modification and placing the system in service, Omaha Public Power District (OPPD) implemented the secondary system boric acid addition program to mitigate steam generator tube denting. With the implementation of this new program, completion and use of the SGBPS was determined not to be cost effective. Therefore, OPPD abandoned the SGBPS in place.

The root cause of this event, as determined by the completion of a Root Cause Analysis (RCA), was a lack of adequate configuration control over the SGBPS. A major contributing cause was an inadequate pre-existing Danger Tagout (DT). In early 1982, the SGBPS was isolated by DT 82-0006 to address potential high energy line break concerns. This DT failed to include FW-1054 and FW-1055, the interface valves between the SGBPS and SGBS. Had these valves been included on DT 82-0006, the Auxiliary Building Operator would not have been able to open FW-1055 under DT 92-2455.

The control room tagging computer was used to generate DT 92-2455. At the time of this event, if a return-to-service position was not specified, the computer selected a default (normal) position for the equipment. The default position in the tagging computer database for FW-1055 was "OPEN", which was consistent with the normal position indicated on the Piping and Instrumentation Diagram (P&ID). However, the normal position should have been "CLOSED". The non-licensed operator who generated DT 92-2455 did not notice that the return-to-service position for FW-1055 was designated as "OPEN". The DT was then approved by the licensed senior operator. This error has been attributed to inattention to detail by both individuals.

Corrective Steps That Have Been Taken and the Results Achieved

1. On December 3, 1992, FW-1054 and FW-1055 were added to DT 82-0006 and tagged closed. This action, combined with a review of the other SGBPS interface valves, ensured that the SGBPS was properly tagged and isolated. On January 12, 1993, DT 93-0033 was initiated to replace DT 82-0006 in its entirety. Subsequently, DT 93-0033 has been closed and all of its applicable valves incorporated into Revision 22 of Standing Order O-44, "Administrative Controls for the Locking of Components." These valves have been locked closed and DT 93-0033 removed.

2. Standing Order SO-O-20, "Equipment Tagging," has been revised to require a separate review and approval of equipment return-to-service positions, in addition to the review for tagged positions. This will be documented by a separate sign-off by a licensed senior operator or shift supervisor on the tagout sheet. As a result, the control room tagging computer will no longer be used to generate a return-to-service position for danger tags. This will ensure that the current plant condition is considered prior to assigning a return-to-service position for equipment.
3. OPPD has instituted an equipment abandonment procedure, GEI-33, "Abandoned In-Place Equipment," which was issued on February 1, 1993. The procedure was written to maintain configuration control of systems/components at Fort Calhoun Station that are no longer used.
4. OPPD recently completed an evaluation to confirm that the piping between FW-1054/FW-1055 and the connections to the 1000 psig rated SGBS, are acceptable for the 1000 psig/600°F design conditions. This evaluation is documented in Facility Change ECN 92-545.
5. A memorandum has been issued to Operations personnel discussing this event. The memorandum also discussed the importance of attention to detail when reviewing DTs, especially the return-to-service positions of equipment.

Corrective Steps That Will Be Taken to Avoid Further Violations

1. A review will be performed by March 1, 1993 to identify other plant systems that are not used and consider the need to danger tag, lock closed or remove these interfaces.
2. The P&IDs will be revised to indicate the required (closed) position for the SGBPS interface valves, and for interface valves on other systems abandoned in place. The P&ID for the SGBPS interface valves will be revised by February 26, 1993. P&IDs for other valves will be revised by April 30, 1993, if necessary.

Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance.