

APPENDIX A
NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
Operating License: DPR-40

During an NRC inspection conducted from August 20 through 31, 1990, a violation of NRC requirements was identified. The violation involved the failure to establish and maintain appropriate plant procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement," 10 CFR Part 2, Appendix C (1990) (Enforcement Policy), the violation is listed below:

Failure to Establish and Maintain Appropriate Plant Procedures

Technical Specification 6.8.1 requires, that, "written procedures be established, implemented, and maintained," for the activities described in Appendix A to Regulatory Guide 1.33, November 1972. Procedures for combating emergencies and abnormal occurrences are included in this requirement.

By order, dated December 17, 1982, Item I.C.1 of NUREG-0737 and Supplement to NUREG-0737 regarding post-TMI action items were made requirements; these included the upgrade of emergency and abnormal operating procedures (EOPs and AOPs). The details of these requirements for upgrade of EOPs and AOPs were described in NUREG-0899 and included a verification and validation process to demonstrate procedural effectiveness.

Contrary to the above, the licensee failed to establish an adequate procedure to control development of the emergency operating procedures. Specifically, the licensee's verification and validation program was inadequate to ensure that the emergency operating procedures were correctly maintained. The failure to establish and maintain adequate EOPs and AOPs was illustrated by the following examples:

- a. Validation and verification of EOPs and AOPs did not include adequate walkdowns outside the control room; therefore, multiple errors in nomenclature, direction, and labeling were not identified, thus leaving the procedures in an erroneous state.
- b. The EOPs and AOPs contained examples of multiple use of "AND" and "OR" in the same statement, thus providing the potential for confusion in the execution of these procedures.
- c. When changes affecting the EOPs or AOPs were made to other procedures, the changes were not always adequately reflected in the EOPs or AOPs, thus resulting in errors and inconsistencies among the procedures.

- d. The EOPs and AOPs were not effectively verified against the licensee's writer's guide, as delineated in NUREG 0899, thus resulting in numerous discrepancies and inconsistencies in the procedures.

This is a Severity Level IV violation. (285/9020-01) (Supplement 1)

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and if applicable, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas
this 31st day of October, 1990