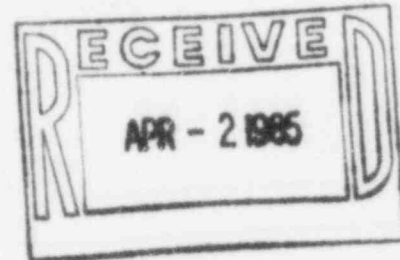


Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

March 28, 1985
LIC-85-120



Mr. Richard P. Denise, Director
Division of Resident, Reactor Project
and Engineering Programs
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Denise:

Notice of Violation
Inspection Report 85-01

The Omaha Public Power District received the Commission's letter dated February 26, 1985, which forwarded Notice of Violation Item 285/85-01, "Failure to Follow Procedures". Pursuant to 10 CFR 2.201, please find attached the District's response to this Notice of Violation.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Andrews".

R. L. Andrews
Division Manager
Nuclear Production

RLA/MRC:rge

Attachment

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

Mr. E. G. Tourigny, NRC Project Manager

Mr. L. A. Yandell, Senior Resident Inspector

8507290128 850724
PDR ADOCK 05000285
Q PDR

LIC-017/85

Attachment

Based on the results of an NRC inspection conducted during the period of January 1-31, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violation was identified:

VIOLATION

Failure to Follow Procedures

Technical Specification 5.8.1 requires that "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI 18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33"

Standing Order G-7 established the Operating Manual and states in Section 1.3 that "adherence to the Operating Manual is mandatory."

Section 4.0 of Standing Order G-22, "Storage of Critical Element and Radioactive Material Packaging, Fire Protection Material, and Calibrating Equipment," contains the requirements for temporary CQE storage and states in the following paragraphs that:

- 4.1, "For large items such as panels or cable, the area must be roped off."
- 4.2, "A sign must be on the rope specifying 'Temporary CQE Storage.' Signs must be obtained from Plant QC after presenting a properly filled out Fort Calhoun Temporary CQE Storage Area Approval Form."
- 4.5, "Only CQE materials shall be stored in any area marked 'Temporary CQE Storage.'"
- 4.7, "QC will perform a periodic inspection on all Temporary CQE Storage Areas using the Fort Calhoun Temporary CQE Storage Area Approval Form as a guide."
- 4.8, "After the Fort Calhoun Temporary CQE Storage Area Approval Form is approved by the Supervisor-Maintenance, QC will file it in an appropriate location in the QC office to be used as a log book to keep track of Temporary CQE Storage Areas."
- 4.9, "After area is no longer required, the group responsible for establishing the area will remove all ropes, signs, etc., turn in the signs to QC who will perform a closeout inspection and forward the Fort Calhoun Temporary CQE Approval Form to the Supervisor-Maintenance who will review and dispose of the form."

VIOLATION (Continued)

Contrary to paragraphs 4.1 and 4.2, on January 18, 1985, the NRC inspector observed that Temporary CQE Storage Area No. 5 was not properly roped off and established. The sign was detached from the rope and laying face down among the pieces of structural steel.

Contrary to paragraph 4.5, on January 18, 1985, the NRC inspector observed that the majority of the structural steel identified with Temporary CQE Storage Area No. 5 was not marked as CQE materials.

Contrary to paragraph 4.7, on January 18, 1985, the NRC inspector determined that no periodic inspection had been performed by plant QC personnel on 10 of the 13 Temporary CQE Storage Areas identified as in effect at that time.

Contrary to paragraphs 4.2 and 4.8, on January 18 and 21, 1985, the NRC inspector identified two locations marked as Temporary CQE Storage Areas that had not been processed or approved in accordance with this procedure.

Contrary to paragraph 4.9, on January 18, 21 and 22, 1985, the NRC inspector determined that Temporary CQE Storage Areas Nos. 2, 3, 4 and 8 were no longer in effect and that the group responsible for establishing the area had not removed "all ropes, signs, etc. . .," and turned them in to QC. The NRC inspector determined that QC had not performed "a closeout inspection" and forwarded "the Fort Calhoun Temporary CQE Approval Form to the Supervisor-Maintenance."

This is a Severity Level IV Violation. (Supplement I.D.3) (285/85-01)

DISTRICT'S RESPONSE

(1) Corrective steps which have been taken and the results achieved.

Each of the Temporary CQE Storage Areas has been inspected by plant management and all discrepancies have been eliminated. Additionally, the number of Temporary CQE Storage Areas has been reduced to a more manageable level. Documented monthly inspections of Temporary CQE Storage Areas are presently being conducted by the Quality Control department. The inspection requirements contained in Plant Standing Orders for CQE Storage Areas were reviewed with QC personnel. These steps provide a high degree of assurance that the CQE Temporary Storage Areas are being kept in accordance with the Fort Calhoun Station Standing Orders. A letter has also been sent to the various groups involved with Temporary CQE Storage Areas to remind them of the requirements of the Fort Calhoun Standing Orders and that they share the responsibility of ensuring that Temporary CQE Storage Areas are properly kept.

DISTRICT'S RESPONSE (Continued)

- (2) Corrective steps which will be taken to avoid future violations.

The District has designated a PRC subcommittee to review the storage of CQE materials. This committee will review the existing areas, discuss possibilities for providing better CQE storage areas, and make recommendations to the Plant Review Committee to change the Fort Calhoun Station Standing Orders to improve the overall program and ensure compliance with all applicable requirements and standards. It is expected this effort will be completed by June 15, 1985.

- (3) The date when full compliance will be achieved.

The District is presently in full compliance.

Al Andrews