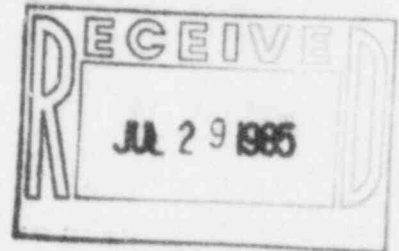


Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

July 26, 1985
LIC-85-350



Mr. Dorwin R. Hunter, Chief
Reactor Project Branch #2
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Reference: Docket No. 50-285

Dear Mr. Hunter:

IE Inspection Report 85-11
Notice of Violation

The Omaha Public Power District received the subject inspection report dated June 26, 1985. This report forwarded a notice of violation for "Failure to Follow Procedures." Pursuant to 10 CFR 2.201, please find attached the District's response to this violation.

Sincerely,

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

R. L. Andrews
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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PDR ADDCK 05000285
Q PDR

IC-098/85

ATTACHMENT

Based on the results of an NRC inspection conducted during the period of May 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:

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-23, "Surveillance Test Program," has been established in accordance with Technical Specification 5.8.1.

Section 6.5 of Standing Order G-23 requires that controls be established "to ensure that completed surveillance tests are accounted for in the files."

Contrary to the above, six surveillance tests performed during the refueling outage ending in July 1984, could not be accounted for in the files.

This is a Severity Level V violation (Supplement 1.E) (285/8511-01).

Response

- (1) The corrective steps which have been taken and the results achieved.

An immediate investigation was conducted to determine locations of the missing six surveillance tests. Four of the missing six surveillance tests were located, found to be adequately completed/reviewed, and re-filed in accordance with Standing Order G-23. For those two surveillance tests which were not located, steps were taken to ensure the tests were indeed performed by referencing documentation of results and/or entries in other procedures and the Control Room Log. In addition, Operations Incident Report 2101 was initiated to ensure these missing surveillance tests provided no safety impact on the Fort Calhoun Station and to ensure continuity of documentation as far as the missing surveillance test files were concerned. These actions have been completed.

- (2) Corrective steps which will be taken to avoid further violations:

The following actions will aid in ensuring accountability of surveillance tests during review and to ensure timely and prompt corrective actions will be implemented should surveillance tests be "unaccounted for" or become lost.

Each month the surveillance test clerk will issue a list of ST's that are due but not filed and those due but not completed. Each supervisor will be required to respond to this list by indicating the status of each test. This status list will then be compiled and presented to the

Plant Review Committee (PRC) by the Supervisor-Technical indicating those tests not completed/not filed and the action taken to assure completion/filing by the end of the next monthly review period. This practice will provide immediate accountability of each test and assurance that action is taken, to document performance of a lost test, in a timely manner. This action is presently being implemented.

To aid in ensuring refueling surveillance tests are filed correctly, a letter will be issued with the refueling surveillance test schedule. This letter will stress the importance of filing all outage surveillance tests, performed or not, with appropriate wording in the remarks section to indicate how the requirements for performance of the test were satisfied.

In addition, a review of a list of "not filed" tests will be conducted in order to account for these tests. If located, documentation of their completion and review will be filed for future reference. If a test cannot be located, an Operations Incident Report will be initiated to ensure the missing test has no safety impact on Fort Calhoun Station.

(3) The date when full compliance will be achieved:

OPPD believes the aforementioned actions, when fully implemented, will ensure that no further violations relating to missing surveillance tests will occur. All actions committed to above either have already been implemented or will be implemented by September 30, 1985.