



Omaha Public Power District
444 South 16th Street Mall
Omaha NE 68102-2247

November 25, 1996
LIC-96-0177

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 (J. E. Dyer) to OPPD (T. L. Patterson) dated October 25, 1996

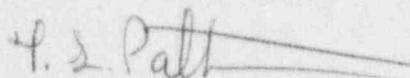
SUBJECT: NRC Inspection Report No. 50-285/96-10, Reply to a Notice of Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an NRC inspection conducted August 25 through October 5, 1996, at the Fort Calhoun Station (FCS). Attached is the Omaha Public Power District (OPPD) response to this NOV.

As stated in Reference 2, it is not necessary for OPPD to respond to the second Violation (285/96010-03), since the corrective actions taken to prevent recurrence are already in place.

If you should have any questions, please contact me.

Sincerely,


T. L. Patterson
Division Manager
Nuclear Operations Division

TLP/gmc

Attachment

c: Winston and Strawn
L. J. Callan, NRC Regional Administrator, Region IV
L. R. Wharton, NRC Project Manager
W. C. Walker, NRC Senior Resident Inspector

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REPLY TO A NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40

During an NRC inspection conducted on August 25 through October 5, 1996, 2 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Appendix B of 10 CFR Part 50 Criterion V, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance and shall be accomplished in accordance with these instructions, procedures, or drawings.

Standing Order SO-G-91, "Control and Transportation of Combustible Material," Revision 7, Step 5.4.1A, requires, in part, that combustibles that are temporarily retained to support an ongoing work activity be minimized and should be limited to 5 gallons of Class B material.

Contrary to the above, on September 20, 1996, the inspectors identified that approximately 150 gallons of epoxy coating and 30 gallons of resin hardener had been left unattended inside the intake structure in close proximity of the diesel driven fire pump.

This is a Severity Level IV violation (285/96010-02) (Supplement I).

- B. Appendix B of 10 CFR Part 50 Criterion V, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance and shall be accomplished in accordance with these instructions, procedures, or drawings.

Radiation Protection Procedure RP-207, "Personal Monitoring and Decontamination," Revision 6, Step 7.5.1A, requires, in part, that personnel found to have detectable contamination on skin or clothing shall be documented on FC-RP-207-2, "Personnel Contamination Log."

Contrary to the above, on September 20, 1996, the inspectors identified that an auxiliary operator had been contaminated while performing rounds and that the contamination was not logged or properly turned over to the oncoming radiation protection technician.

This is a Severity Level IV violation (285/96010-03) (Supplement IV).

OPPD Response

As stated in Reference 2 on the cover letter, Omaha Public Power District (OPPD) is not required to respond to violation 96010-03 because of corrective actions already taken and documented within Reference 2. Therefore, OPPD has elected not to respond to that violation.

OPPD Response to Violation 96010-02

1. The Reason for the Violation

The cause of this violation was that the Maintenance Planner involved in this activity did not consider that the materials involved in this incident constituted a fire hazard or a fire loading concern. Contributing causes of this violation are that the material containers were not identified as flammable or combustible; and, employees of the contract company performing the coating application were not aware of, or briefed specifically on, the requirements of Standing Order SO-G-91, "Control and Transportation of Combustible Material."

2. Corrective Steps Which Have Been Taken and the Results Achieved

- a. A meeting was conducted with Maintenance Planning, the Supervisor-Maintenance Support, the Maintenance Planning Coordinator, the Fire Protection Engineer, the Hazardous Materials Chemist, an Operations representative and the Contractor owner/representative. During this meeting, the Supervisor-Maintenance Support clarified expectations for the conduct and work performance of contractor employees to the contract representative. Additionally, the Supervisor-Maintenance Support clarified that should the contractor have any questions, they should contact the OPPD representative and/or Operations Shift Supervisor immediately. This meeting was held on September 20, 1996.
- b. A walkdown of contractor work locations was performed to ensure material storage and handling of combustible/flammable materials was in accordance with SO-G-91. This was completed on September 20, 1996.
- c. The Maintenance Planners were briefed on the event and were required to re-read SO-G-91. This was completed on September 23, 1996.
- d. The contractors involved in this incident were monitored by OPPD personnel on a continual basis for the remainder of their project. The contractor was released, upon job completion, on September 28, 1996.

- e. Management expectations on the knowledge and accountability of SO-G-91 was addressed in training via the issuance of a required reading "Hotline." The intent was to improve SO-G-91 work practices and planning. Included in this training were General Maintenance, Central Maintenance, Maintenance Planners, appropriate craft, Contractors, Field Engineers, System Engineers, Quality Assurance, Quality Control and Special Service Engineering. This Hotline was issued on October 10, 1996.
- f. An interim combustible awareness process was implemented in cooperation with the Chemistry, Nuclear Procurement Services and System Engineering departments. This process will be in effect until the new labeling process to identify chemicals with SO-G-91 applicability is in place, as discussed below. This interim process was in place on November 11, 1996.

3. **Corrective Steps Which Will Be Taken to Avoid Further Violations**

- a. Maintenance Planning will create a contractor checklist of OPPD expectations and project requirements. This checklist will be used to brief contractors when they will not be working under the direct supervision of OPPD personnel. This will be complete by December 22, 1996.
- b. Standing Order SO-G-91 will be revised to make the guidance less complex and easier for craft individuals to work with. This will be complete by March 30, 1997.
- c. Procedures will be evaluated and revised, as necessary, to require the application of labels which simultaneously addresses the Standing Order SO-G-70, "Chemical Control," and SO-G-91 requirements. This will be completed to promote the visibility of flammables and combustibles consistent with the labeling of hazardous materials. This will be complete by December 31, 1997.

4. **Date When Full Compliance Will Be Achieved**

OPPD is currently in full compliance.