

OPPD

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

August 30, 1985
LIC-85-385

Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch #3
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

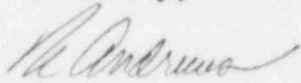
- References: (1) Docket No. 50-285
(2) NRC Generic Letter 83-28 dated July 8, 1983
(3) Letter NRC (E. G. Tourigny) to OPPD (R. L. Andrews) dated May 21, 1985
(4) Letter OPPD (R. L. Andrews) to NRC (E. J. Butcher) dated June 27, 1985 (LIC-85-268)

Dear Mr. Butcher:

Request for Additional Information on Item 1.1
Generic Letter 83-28

The Omaha Public Power District (OPPD) received Reference (3) which requested additional information concerning post-trip review. Accordingly, please find attached OPPD's response to the Reference (3) concerns.

Sincerely,



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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Attachment

NRC Request and Recommendation

- A. With regard to the criteria for determining the acceptability of restart for any unscheduled reactor trip, the licensee indicated a post-trip review is conducted to identify the cause of the trip and the subsequent corrective action taken prior to the plant restart. We find that this action taken by the licensee is not sufficient to ensure a safe plant operation. We recommend that prior to the authorization for restart, an analysis should be conducted to verify that systems which are important to reactor safety have performed as required.

District Response

A step has been added to Fort Calhoun Station Operating Procedure OP-1 to require (for startup following an unscheduled reactor trip) Shift Technical Advisor and Shift Supervisor signoffs verifying that the major safety systems which are important to reactor safety have functioned as required.

NRC Request and Recommendation

- B. The responsibilities and authorities of the personnel who will perform the review and analysis have not been clearly defined. We recommend that the post-trip review team include a member of plant management at the Shift Supervisor level or above who holds or has held an SRO license on the plant (the Shift Supervisor who was on shift at the time of the event would be acceptable) and who has the responsibility and authority to obtain all necessary personnel and data to ensure a thorough and complete post-trip review. In addition, the post-trip review team should include an STA or an Engineer who has had special transient analysis training. These two people should have a joint responsibility to concur on a decision to restart the plant, and each should have the unilateral authority to prevent a restart.

District Response

Revisions have been made to Fort Calhoun Station Operating Procedure OP-1. The trip recovery procedure portion of OP-1 has been revised to require joint sign-off by both an STA and the Shift Supervisor after an unscheduled reactor trip. Approval to take the reactor critical will not be given until the Plant Review Committee concurs that appropriate actions have been taken, and authorizes restart.

NRC Request and Recommendation

- C. The licensee has not addressed the methods and criteria for comparing the event information with known or expected plant behavior. We recommend that the pertinent data obtained during the post-trip review be compared to the applicable data provided in the FSAR to verify proper operation of the systems or equipment. Where possible, comparisons with previous similar events should be made.

District Response

A step has been added to Fort Calhoun Station Operating Procedure OP-1 requiring (for startup following an unscheduled reactor trip) Shift Technical Advisor and Shift Supervisor signoff verifying that pertinent data from the post-trip review have been compared to applicable events in the USAR and systems and equipment have been verified to have operated properly.

NRC Request and Recommendation

- D. The licensee has not addressed the criteria for determining the need for independent assessment of an event. We recommend that if any of the review guidelines (as stated in Section II.A of this SER) are not met, an independent assessment of the event should be performed by the PORC or a group with similar authority and experience.

District's Response

A step has been added to Fort Calhoun Station Operating Procedure OP-1. This step is part of the Trip Recovery Procedure to be performed prior to restart following an unscheduled reactor trip. Both the STA and Shift Supervisor now sign off verifying that the post-trip review has not resulted in the discovery of a potential safety concern.

Additionally, both the STA and Shift Supervisor must sign off verifying that the root cause has been determined and corrected. Systems important to reactor safety are verified as having operated as required. Independent assessment is assured as the Plant Review Committee must review OP-1, concur that appropriate actions have been taken, and authorize restart before the reactor can be taken critical.

NRC Request and Recommendation

- E. With regard to a systematic safety assessment program to assess unscheduled reactor trips, the licensee referred to plant operating procedure (OP-1), plant operating orders (O-2 and O-5), and report form (FC-96). We have reviewed these plant operating procedures, orders and report forms, and have not been able to conclude that the licensee has in place a systematic safety assessment program to assess unscheduled reactor trips. We recommend that the licensee develop a systematic safety assessment program in accordance with the guidelines as described in the above Section II.E to handle unscheduled reactor trips.

District's Response

A systematic assessment program for assessing unscheduled reactor trips has resulted from the above described revisions to Fort Calhoun Station Operating Procedure OP-1.