



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

February 26, 1997

EA 96-489

S. K. Gambhir, Division Manager
Production Engineering
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
P.O. Box 399
Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska 68023-0399

SUBJECT: NOTICE OF VIOLATION
(NRC SPECIAL INSPECTION REPORT 50-285/96-17)

Dear Mr. Gambhir:

This refers to the predecisional enforcement conference conducted in the Region IV office on January 29, 1997. The conference was conducted to review the circumstances surrounding apparent violations described in the subject report, which was issued on December 29, 1996. The inspection reviewed the apparent inoperability of the Post-Accident Sampling System (PASS) from February 1996 to July 1996. The results of that inspection were discussed with you and your staff on December 20, 1996.

Based on the information developed during the inspection and the information that you provided during the conference, the NRC has determined that two violations of NRC requirements occurred. These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. Both violations relate to the containment atmospheric portion of the PASS. The first violation involves a failure to follow procedures in two examples: (1) after the in-line isotopic analyzer had been disabled in August 1995, plant personnel failed to revise or cancel a preventive maintenance order which required drawing a containment atmospheric sample utilizing the analyzer; and (2) a preventive maintenance order (to perform containment atmosphere sampling) was administratively closed without the plant manager's approval. The second violation involves a failure to follow procedures when configuration changes to the PASS were made prior to completion and issuance of an Engineering Change Notice. This violation is of concern because an Engineering Department manager gave verbal authorization to remove the in-line isotopic analyzer prior to completion of the Engineering Change Notice, in violation of configuration control procedures.

Your cause determination indicated that the violations resulted from inappropriate responses to material deficiencies on the PASS (inappropriate use of Chemistry Reject Tag, lack of timely leak evaluation, lack of timely maintenance, . . .), problems with the configuration control process (lack of depth in evaluation and review by engineering, and



less than timely completion of the Engineering Change Notice), and inconsistencies in the administrative requirements for closeout of preventive maintenance.

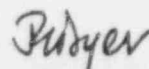
At the time of the inspection, we were concerned that the violations caused the containment atmospheric portion of the PASS to be inoperable for 4 months. However, after the inspection, your staff conducted extensive analyses and determined that the system had been operable. Given their safety significance, the violations have been classified at Severity Level IV.

Nevertheless, these violations raise concerns about the implementation of the Fort Calhoun Station (FCS) configuration control program and about the proper adherence of FCS personnel to administrative procedures. Proper implementation of the configuration control program is essential to ensure that plant physical and functional characteristics are consistent with and are being maintained in accordance with their licensing and design bases. The instances cited and other instances discussed as contributing causes during the predecisional enforcement conference indicate weakness in implementing administrative procedures. If left uncorrected, this type of weakness can lead to a degradation in the overall performance at FCS. In addition, there are indications of a lack of thoroughness in operability evaluations regarding the PASS from January 1996 through system restoration in July 1996. Proper evaluation of degraded conditions identified in important systems, even though they do not have Technical Specification limiting conditions for operation, is important to ensure that the systems can function in accordance with their licensing and design bases.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room.

Sincerely,



J. E. Dyer
Acting Regional Administrator

Docket No. 50-285
License No. DPR-40

Enclosure: Notice of Violation

cc w/enclosure: (see next page)

Omaha Public Power District

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cc w/enclosure:

James W. Tills, Manager

Nuclear Licensing

Omaha Public Power District

Fort Calhoun Station FC-2-4 Adm.

P.O. Box 399

Hwy. 75 - North of Fort Calhoun

Fort Calhoun, Nebraska 68023-0399

James W. Chase, Manager

Fort Calhoun Station

P.O. Box 399

Fort Calhoun, Nebraska 68023

Perry D. Robinson, Esq.

Winston & Strawn

1400 L. Street, N.W.

Washington, D.C. 20005-3502

Chairman

Washington County Board of Supervisors

Blair, Nebraska 68008

Cheryl Rogers, LLRW Program Manager

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