

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket No. 50-285
License No. DPR-40
EA 96-489

During an NRC inspection conducted on November 22 - December 20, 1996, 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. Technical Specification 5.15 requires, in part, that a program shall be implemented and maintained to ensure the capability to accurately monitor and or sample/analyze radiological effluents and concentrations in a post-accident condition, including the capability to obtain and analyze a containment atmosphere sample under accident conditions. This program shall include provisions for maintenance of sampling and analysis equipment.

Procedure SO-G-98, "Administrative Controls for Operation, Maintenance and Testing of the Post Accident Sampling System [PASS]," Revision 2, Step 5.4.1, stated that periodic maintenance and testing of the PASS is administered by the preventive maintenance order program.

Procedure SO-M-2, "Preventive Maintenance Order," Revision 24, Step 5.3.2, stated, in part, that personnel have the responsibility to initiate changes to preventive maintenance tasks on equipment within their disciplines to assure effective preventive maintenance activities. Step 11.2.4.B, required, in part, that the maintenance supervisor and plant manager shall sign for approval of tasks which are safety, security, and commitment related for administrative closeout.

Contrary to the above, the licensee did not implement its program provisions for maintenance of sampling and analysis equipment. Specifically, two instances of failure to follow Procedure SO-M-2 were identified:

1. Preventive Maintenance Order (PMO) 9605793, which directed the drawing of a containment atmospheric sample utilizing the isotopic analyzer, was not revised or canceled after the disabling of the in-line isotopic analyzer. Licensee personnel attempted to use the outdated PMO on August 21, 1996, although the in-line isotopic analyzer had been disabled since August 1995. (01014)
2. PMO 9603987 was issued to perform containment atmosphere sampling using the Post Accident Sampling System in April 1996. This quarterly sampling was implementing a commitment of the program required by Technical Specification 5.15. PMO 9603987, which was commitment-

related, was administratively closed on May 22, 1996, without Plant Manager approval. (01024)

This is a Severity Level IV violation. (Supplement I)

- B. 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that procedures affecting quality shall be accomplished in accordance with prescribed procedures.

Procedure PED-QP-2, "Configuration Change Control," Revision 18, defined the configuration control boundary, in part, as any system or structure located within the protected area at Fort Calhoun Station. Step 4.1.5(2) of this procedure, required, in part, that all configuration changes within the configuration control boundary shall be authorized by one of several methods, one of which was an Engineering Change Notice.

Contrary to the above, between August 1995 and December 21, 1995, configuration changes were made, within the configuration control boundary, without an authorized method. Specifically, computer equipment that controlled the isotopic analysis portion of the Post Accident Sampling System was removed prior to completion and issuance of an Engineering Change Notice, or any other approved method. (01024)

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District (Licensee) is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violations, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request

withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas
this 26th day of February 1997