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NUCLEAR REGULATORY COMMISSION

REGION IV

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APR 10 1997

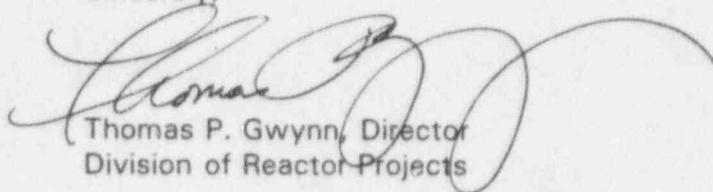
EA 96-489

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: NRC INSPECTION REPORT 50-285/96-17

Thank you for your letter of March 31, 1997, in response to our letter and Notice of Violation dated February 26, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

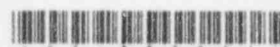


Thomas P. Gwynn, Director
Division of Reactor Projects

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

cc:
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APR 10 1997

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/B)

Project Engineer (DRP/B)

Resident Inspector

DRS-PSB

MIS System

RIV File

Branch Chief (DRP/TSS)

DOCUMENT NAME: R:_FCS\FC617AK.WCW

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RIV:PE:DRP/B	C:DRP/B	D:DRP					
DNGraves;df	WDJohnson	TPGwynn					
4/8/97	4/8/97	4/10/97					

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APR 10 1997

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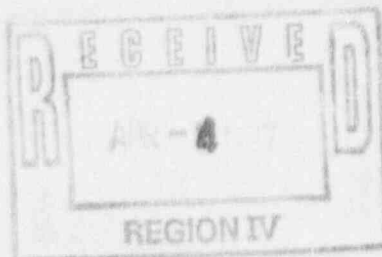


Omaha Public Power District

444 South 16th Street Mall
Omaha NE 68102-2247

March 31, 1997

LIC-97-0039



U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Mail Station P1-137

Washington, D.C. 20555

- References:
1. Docket No. 50-285
 2. Letter from NRC (J. E. Dyer) to OPPD (S. K. Gambhir) dated February 26, 1997

SUBJECT: NRC Inspection Report No. 50-285/96-17, Reply to a Notice of Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an NRC inspection conducted November 22 through December 20, 1996, at the Fort Calhoun Station (FCS).

The Omaha Public Power District (OPPD) recognizes the importance of effective configuration control at FCS and understands the seriousness of the occurrence of the inappropriately authorized change mentioned in Reference 2. OPPD has initiated a self assessment of the configuration change controls currently in place at FCS. This self assessment will focus on determining the scope and significance of unauthorized configuration changes at FCS. In addition, the self assessment will evaluate the need for any additional corrective actions. The assessment is scheduled to be completed by April 30, 1997. The results of this self assessment will be transmitted to the NRC upon completion of the assessment report by May 30, 1997.

Attached is the Omaha Public Power District (OPPD) response to this NOV. If you should have any questions, please contact me.

Sincerely,

S. K. Gambhir

Division Manager

Engineering & Operations Support

EPM/epm

Attachment

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

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97-0919

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: 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).

OPPD Response

A. The Reason for the Violations

The causes for the violations listed above fall into two categories. Violations A.1 and B were caused by problems with the configuration control process. Violation A.2 was a separate issue which will be discussed below.

Violations A.1 and B occurred due to a failure to adequately coordinate a change to the plant's configuration between various functional areas, as well as, administrative oversights on the part of management.

On February 17, 1994, the NRC approved a request made by FCS to eliminate the capability of the PASS to perform in-line isotopic analysis of the Reactor Coolant System (RCS) and containment atmosphere, relying on the existing grab sampling capabilities. The use of grab sampling is specified to be an acceptable alternative to in-line capabilities in NUREG 0737 Section 11.8.3.

Following NRC approval of this PASS submittal the PMOs which tested the in-line isotopic analysis portions of the system were not performed except for the instance noted which was scheduled and performed in error by the scheduler and technician.

In March 1994, Engineering Change Notice (ECN) 94-107 was submitted to abandon or remove the in-line isotopic analysis portion of the PASS. ECN 94-107 was not issued until February 6, 1997. In December 1995, Design Engineering Management, at the request of Radiation Protection (RP) Management, incorrectly authorized the removal of the Canberra

System 80 computer cabinets from their location in the RP Count Room. These computers were used to analyze the in-line samples taken by the PASS. The computers had not been used for this purpose since the NRC approved the request for a change in system capabilities. The authorization to remove the cabinets was given after the area was inspected by Design Engineering Management. The approval was given based upon the facts that, the computers were free standing (not bolted to the floor), the location of the computers was not shown on prints, and that power for them was easily (120 VAC plug-in) removed.

This change in plant configuration was contrary to the requirements in Production Engineering Division (PED) procedure PED-QP-2 "Configuration Change Control" and Standing Orders (SO) G-21 "Modification Control" and O-25 "Temporary Modification Control". Failure to follow the configuration control process resulted in the documentation associated with the removed equipment not being updated in a timely manner. This documentation included the PASS administrative procedure (SO-G-98 "Administrative Controls for Operation, Maintenance and Testing of the Post Accident Sampling System"), the associated PMOs, and the appropriate Chemistry Sampling Procedures (CH-SMP-PA-0001 "Post Accident Sampling System Normal Operation" and CH-SMP-PA-0002 "Post Accident Sampling System Accident Operation"). The computer cabinets were removed within a few days of receipt of the authorization and, subsequently sent to the warehouse.

On December 21, 1995, a condition report (CR 199500428) was generated by the PASS System Engineer after he had been made aware of the removal of the computer cabinets. He believed that the removal of this equipment conflicted with station configuration control procedures.

A Root Cause Analysis (RCA) was conducted (January 1997) to evaluate this event as it relates to configuration control. The RCA concluded that the event was a result of a lack of in depth evaluation and review by DEN Management.

Violation A.2 was made due to errors in procedure SO-M-2 and its associated form FC-1066 "Preventive Maintenance Program Task Deferral/Administrative Close Out." In the procedure it was intended that the Plant Manager (PM) would review only EEQ and Safety Related PMOs that were being deferred or closed out. During a subsequent procedure change Security and Commitment related PMOs were added to the list of items the PM would authorize. The FC-1066 did not indicate that PM approval was needed for either Commitment or Security related PMOs.

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

1. The DEN Management personnel involved with the approval of the undocumented configuration change (and their successors) have been verbally counseled on the requirements related to configuration control and the acceptable scope of an in depth review. In addition, ECN 94-107 has been issued for the formal removal/abandonment of the associated equipment. As an interim measure, Temporary Modification (TM) 96-033 has been installed to document the removal/abandonment of the equipment

associated with the isotopic analysis of the RCS and containment atmosphere until ECN 94-107 can be completed. This ECN was issued February 6, 1997, and is scheduled for installation by August 1, 1997.

2. PASS operating procedures CH-SMP-PA-0001 and CH-SMP-PA-0002 have been updated (01/07/97) to reflect the removal of the isotopic analysis equipment.
3. The PMOs associated with the isotopic analysis equipment have been inactivated. They will be deleted during completion of ECN 94-107.
4. SO-M-2 was revised to remove the requirement that the Plant Manager sign off administratively closed PMOs that have commitments associated with them.
5. The Chemistry Department was informed of the NRC violations and the causes for them during the monthly Chemistry Department meeting held on January 31, 1997. Chemistry personnel have a heightened awareness of this and similar industry events with respect to configuration control.
6. Management expectations related to configuration control have been emphasized to Engineering Personnel (Design Engineers and System Engineers) and other appropriate station personnel (Operations, Maintenance, and Radiation Protection (RP)) to prevent further occurrences.
7. The plant operations staff has been encouraged to report situations where redundant equipment does not appear identical. The reporting of any such findings is done using the corrective action system. Operators, System Engineers, Maintenance craft personnel and Chemistry technicians have been actively documenting such configuration issues as they occur. The engineering staff is following up on a number of these items to ensure that adequate documentation exists to support the design of the plant. The self assessment report mentioned in the cover letter will address many of these issues.
8. A process to abandon equipment has been defined.

C. Corrective Steps Which Will Be Taken

No additional corrective actions are required.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.