



Omaha Public Power District

444 South 16th Street Mall
Omaha NE 68102-2247

June 19, 1997

LIC-97-0099

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 (T. P. Gwynn) to OPPD (S. K. Gambhir) dated May 19, 1997

SUBJECT: NRC Inspection Report No. 50-285/97-07, Reply to a Notice of Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an NRC inspection conducted March 23 through May 3, 1997, at the Fort Calhoun Station (FCS). Attached is the Omaha Public Power District (OPPD) response to this NOV.

OPPD disagrees with Violation A in Reference 2. A response has been provided that does not deny the violation, but, places the violation where OPPD believes it should have been cited.

If you should have any questions, please contact me.

Sincerely,

James H. Zills For

S. K. Gambhir

Division Manager

Engineering & Operations Support

GRC/grc

Attachment

230031

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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G PDR



NOTICE OF VIOLATION

Omaha Public Power District
50-285
Fort Calhoun Station
License: DPR-40

Docket:

During an NRC inspection conducted on March 23 through May 3, 1997, two 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 circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Standing Order SO-R-2, "Corrective Action Program," Revision 3, Step 2.2, states, in part, that defective material and equipment, abnormal occurrences, and nonconformances affecting structures, systems or components require the initiation of a condition report.

Contrary to the above, the inspector identified that, on March 26, 1997, engineering personnel did not initiate a condition report when a body-to-bonnet steam leak was identified on the steam trap inlet valve for the turbine-driven auxiliary feedwater pump steam supply line.

This is a Severity Level IV violation. (Supplement 1)(285/97007-01)

- B. Technical Specification 5.8.1 states, in part, that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the minimum requirements of Regulatory Guide 1.33.

Regulatory Guide 1.33, Appendix A, Section 9.a., states, in part, that maintenance that can affect the performance of safety-related equipment shall be performed in accordance with written procedures or documented instructions appropriate to the circumstances.

Standing Order SO-M-100, "Conduct of Maintenance," Step 4.6.2, directs maintenance personnel to perform maintenance in accordance with approved documents.

Preventive Maintenance Order 9701947 directed maintenance personnel to blow down the raw water supply header flow transmitter sensing lines by opening the drain valve to clear the lines. Step 6 of the preventive maintenance document stated that, if the sensing lines could not be cleared, initiate a maintenance work document to document the deficiency.

Contrary to the above, in addition to opening the drain valve to clear the sensing lines, the inspector found that on April 7, 1997, maintenance personnel used nitrogen to blow down the sensing line without initiating a maintenance work document to document the deficiency.

This is a Severity Level IV violation (Supplement 1)(285/97007-02).

OPPD Response to Violation A

A. The Reason for the Violation

OPPD disagrees that a violation of Standing Order SO-R-2, "Condition Reporting and Corrective Action," occurred. Instead, there exists a misunderstanding of the requirements of SO-R-2, Step 2.2. Step 2.2 states, "This procedure applies to, and requires origination of a Condition Report for any of the following:

- Failures, malfunctions, deficiencies, or deviations affecting Structures, systems, or components that are considered sudden or unexpected and outside the anticipated performance history of the structure, system, or component, or
- Defective materials and equipment, abnormal occurrences, and nonconformances affecting structures, systems, or components, or
- Equipment related events, documentation deficiencies, non-routine outside agency notifications, operational events, testing deficiencies, security infractions, human performance errors, personnel safety issues, radiological occurrences, or other circumstances which impact or potentially impact safe and/or reliable operation of the Fort Calhoun Station, or
- Events identified which are, or are suspected of being, adverse to quality"

The event in question was a body-to-bonnet gasket leak on MS-234, "Steam Trap ST-15 Inlet Valve." This valve, which tees off the steam supply line to FW-10, the turbine-driven auxiliary feedwater pump, is a Dresser Industries, one inch, manual globe valve, with a 2000 psig pressure rating. While body-to-bonnet steam leaks are not desirable, it is not uncommon in the industry for small globe valves to develop steam leaks over time. Therefore, it is unreasonable to say that this steam leak was sudden or unexpected and outside the anticipated performance history of the structure, system, or component (SSCs), or that the leak was due to defective materials and equipment, abnormal occurrences, and nonconformances affecting SSCs. In fact, the leak was not adverse to quality, and did not affect the performance of FW-10. Therefore, no violation of Standing Order R-2 occurred.

However, OPPD does admit that this event did involve a violation of Standing Order M-101, "Maintenance Work Control." This steam leak was identified by a Design Engineer on March 26, 1997. The System Engineer, following notification of the problem by the Design Engineer, wrote a Maintenance Work Request (MWR). Step 5.2.5 of M-101 states, in part, "A Work Request Tag should be completed whenever a MWR is initiated for an equipment deficiency." A Work Request Tag was subsequently completed and attached to the valve.

As a result, OPPD is taking corrective actions associated with Standing Order M-101 as opposed to Standing Order R-2.

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

1. Valve MS-234 was repaired under Maintenance Work Order 970142 on April 4, 1997, within four working days after the Design Engineer identified the leak.
2. OPPD maintains that the failure to attach a work request tag was an isolated case. The System Engineer involved in this incident is aware of the requirement for installing these tags. However, the System Engineer involved in the event has been counseled on the need to attach Work Request Tags on equipment whenever a Maintenance Work Request has been written. Additionally, the engineer was counseled on management's expectations on attention to detail and equipment walk-downs.

C. Corrective Steps Which Will Be Taken

This event will be covered during an Engineering and Operations Support continuing training session to review management expectations with the Engineering Staff. This will be completed by September 30, 1997.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.

OPPD Response to Violation B

A. The Reason for the Violation

OPPD admits the violation occurred. The reason for this violation was failure to comply with the procedure verbatim. The technicians interpreted the term "blowdown" to include the use of low pressure nitrogen to remove the obstruction in the sensing line as a skill of the craft. This was performed at the direction of the craft supervisor.

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

On April 30, 1997, the work instructions of the Preventive Maintenance Order (PMO) were changed to allow the use of a nitrogen bottle to clear sensing lines of obstructions. The change also included instructions for notification of the System Engineer when use of nitrogen was required.

C. Corrective Steps Which Will Be Taken

A briefing of maintenance personnel assigned to Fort Calhoun Station and the System Engineering Department will be conducted to emphasize the requirements of SO-G-7, "Operating Manual," SO-M-100, "Conduct of Maintenance," and SO-M-101, with regard to procedure usage and adherence. This briefing will be completed by August 15, 1997.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.