

OPPD

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

March 4, 1988
LIC-88-159

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from OPPD (R. L. Andrews) to NRC (Document Control Desk) dated February 24, 1988 (LIC-88-120)

Gentlemen:

SUBJECT: Response to Notice of Violation
NRC Inspection Report 50-285/87-24 - Revision

Today, the NRC Senior Resident Inspection brought to my attention an incorrect statement in Reference 2, relative to instances of improperly stored gas cylinders. This statement has been deleted from the attached revised response. An investigation is underway to determine why this error occurred.

We will notify you of the results of this investigation and also provide you with an update to the attached response by March 18, 1988. If you have any questions concerning this matter, please do not hesitate to contact us.

Sincerely,



R. L. Andrews
Division Manager
Nuclear Production

RLA/me

cc: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

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RESPONSE TO NOTICE OF VIOLATION

During an NRC inspection conducted on September 1-30, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50 states, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Paragraph 1.0 of Section 6.4, "Housekeeping," of the licensee's Quality Assurance Plan (QAP) states, in part, that this plan section specifies the quality assurance requirements for housekeeping controls for protection of equipment. Paragraph 4.5 of QAP Section 6.4 states, in part, that instructions which implement this plan section shall be contained in the station standing orders.

Standing Order (SO) G-6, "Housekeeping," was issued to implement the requirements of QAP Section 6.4. Paragraph 3.3.5 of SO-G-6 states, in part, that gas cylinders shall be properly stored in the auxiliary building, with caps installed, unless in use or use is intended within a short period of time.

Contrary to the above, the licensee failed to properly store gas cylinders in the auxiliary building in that cylinders were secured to a safety-related seismic support; cylinders were secured in an unapproved storage method using a 3/8-inch nylon rope and cylinders were left unsecured in the auxiliary building.

This is a Severity Level IV violation. (Supplement I)(285/8724-04)

OPPD'S RESPONSE

Reason for the Violation, If Admitted

The procedural guidance provided at the time of this violation was Standing Order G-6, "Housekeeping," which stated that "gas cylinders shall be properly stored in the Auxiliary Building, with caps installed, unless in use or use is intended within a short period." Standing Order G-6 does not define the phrase "properly stored" and does not contain a discussion of bottle position, securing devices or locations, nor does it define the phrase "short period". A memorandum was issued to clarify Standing Order G-6 however its guidelines were not followed for the placement of the subject gas cylinders.

Corrective Steps Which Have Been Taken and the Results Achieved

The failure to properly store gas cylinders on September 21, 1987 was followed by the following actions: management attention was increased with respect to field conditions and station supervisors increased the frequency of their plant tours. These tours became more sensitive to the issue of the storage of compressed gas cylinders.

Attachment (Continued)

Corrective Steps Which Will be Taken to Avoid Further Violations

Standing Order G-6 will be revised to provide detailed guidance with respect to gas bottle storage and initial training will be provided for gas bottle users by May 1, 1988.

Date When Full Compliance will be Achieved

OPPD is currently in full compliance.