



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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March 3, 2008

D. J. Bannister
Site Director
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SUBJECT: ANNUAL ASSESSMENT LETTER – FORT CALHOON STATION
(NRC INSPECTION REPORT 05000285/2008001)

Dear Mr. Bannister:

On February 6, 2008, the NRC staff completed its performance review of Fort Calhoun Station. Our technical staff reviewed performance indicators for the most recent quarter and inspection results for the period from January 1 through December 31, 2007. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official Use Only--Security Information" will include the security cornerstone review and resultant inspection plan.

Plant performance for the most recent quarter at Fort Calhoun Station was within the Degraded Cornerstone column of the NRC's Action Matrix based on two White findings associated with the Mitigating Systems Cornerstone. One White finding involved the improper installation of the valve disk of Containment Spray Header Isolation Valve HCV-345 (NRC EA-07-047; ADAMS ML071500074). The second White finding consisted of two separate violations associated with inadequate corrective actions and improper maintenance on the emergency diesel generators (NRC EA-07-194; ADAMS ML073410416). Our updated assessment was communicated to you in our Assessment Follow-up Letter, dated June 27, 2007 (ADAMS ML071780621).

When we are notified by your staff of your readiness for the NRC to conduct a supplemental inspection to review the actions taken to address the White findings and a previously identified White PI, we plan to implement supplemental Inspection Procedure 95002 "Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area." This inspection will be performed to provide assurance that the root and contributing causes for the individual and collective risk significant performance issues are understood, to independently assess the extent of condition and the extent of cause, to independently determine whether safety culture components caused or significantly contributed to the individual or collective risk significant performance issues, and to provide assurance that the corrective actions are sufficient to address the root and contributing causes, as well as to prevent recurrence.

In our 2006 annual assessment letter, dated March 2, 2007 (ADAMS ML070610601), the NRC staff identified a substantive crosscutting issue in the area of human performance at Fort Calhoun Station. Specifically, we identified a crosscutting theme in the work practices component involving instances of ineffective use of human error prevention techniques. Your staff conducted a root cause determination and formed a cross-disciplinary team that identified recommendations for improvements in this area. Additionally, in our midcycle assessment letter dated August 31, 2007 (ADAMS ML072430778), we identified another theme in the resources component of the human performance area, involving instances of failure to provide adequate procedures or work instructions. We understand that this additional component/theme was added to your plan for corrective actions for the human performance area.

During this assessment period, the NRC noted improvement in the human performance aspect of work practices as demonstrated by a reduction in the number of findings associated with the ineffective use of human error prevention techniques. However, the NRC staff identified six findings related to the resources component of the human performance area. These findings also had a common theme related to failure to provide adequate procedures or work instructions and occurred in the Mitigating Systems and Initiating Events cornerstones. Examples include an inadequate maintenance procedure for auxiliary contacts on the emergency diesel generator, an inadequate procedure for establishing backup raw water to the containment fan coolers during post-accident conditions with a loss-of-component cooling water, and a procedure that improperly defined missile hazards which resulted in debris that did not meet the definition causing loss of 161 kV power to the safety-related busses. Overall, your corrective actions have not yet proven effective in substantially mitigating the human performance crosscutting theme in the resources component involving instances of failure to provide adequate procedures or work instructions. Therefore, the substantive crosscutting issue in human performance will remain open until we determine, through the implementation of focused baseline inspections, that corrective actions implemented in accordance with your improvement initiatives have adequately addressed these issues.

Since this is the second consecutive assessment letter identifying the same crosscutting theme, we request that you provide a response to this issue at the annual public meeting. Your response should provide details on your corrective actions planned to address the procedure adequacy crosscutting issue, including schedule, milestones, and performance monitoring metrics.

The enclosed inspection plan details the inspections, except those related to physical protection, scheduled through June 30, 2009. The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the midcycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Jeff Clark at 817-860-8147 with any questions you may have regarding this letter or the inspection plan.

Sincerely,



Elmo E. Collins
Regional Administrator

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

Enclosure: Fort Calhoun Station Inspection/ Activity Plan

cc w/Enclosure:

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Fort Calhoun
 Inspection / Activity Plan
 03/01/2008 - 06/30/2009

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Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
1	PBE - 95002 SUPPLEMENTAL INSPECTION		5			
1	IP 95002	Inspection For One Degraded Cornerstone Or Any Three White Inputs In A Strategic Performance		03/10/2008	03/21/2008	Supplemental Program
1	EB1-08 - INSERVICE INSPECTION & TI 166		2			
1	IP 2515/166	Pressurized Water Reactor Containment Sump Blockage [NRC GENERIC LETTER 2004-02]		04/28/2008	05/09/2008	Safety Issues
1	IP 7111108P	Inservice Inspection Activities - PWR		04/28/2008	05/09/2008	Baseline Inspections
1	RP-ORS1 - OCCUPATIONAL RADIATION SAFETY-ACCESS		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		04/28/2008	05/02/2008	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		04/28/2008	05/02/2008	Baseline Inspections
1	IP 71151-OR01	Occupational Exposure Control Effectiveness		04/28/2008	05/02/2008	Baseline Inspections
1	IP 71151-PR01	RETS/ODCM Radiological Effluent		04/28/2008	05/02/2008	Baseline Inspections
1	RP TEAM - RADIATION SAFETY TEAM INSPECTION		5			
1	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		06/02/2008	06/06/2008	Baseline Inspections
1	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		06/02/2008	06/06/2008	Baseline Inspections
1	IP 7112202	Radioactive Material Processing and Transportation		06/02/2008	06/06/2008	Baseline Inspections
1	IP 7112203	Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control Program		06/02/2008	06/06/2008	Baseline Inspections
1	EB2-07T - TRIENNIAL HEAT SINK INSPECTION		1			
1	IP 7111107B	Heat Sink Performance		07/07/2008	07/11/2008	Baseline Inspections
1	EB2-05T - TRIENNIAL FIRE PROTECTION		4			
1	IP 7111105T	Fire Protection [Triennial]		07/14/2008	07/18/2008	Baseline Inspections
1	IP 7111105T	Fire Protection [Triennial]		07/28/2008	08/01/2008	Baseline Inspections
1	IP 7111105T	Fire Protection [Triennial]		08/11/2008	08/15/2008	Baseline Inspections
1	RP-ORS2 - OCCUPATIONAL RADIATION SAFETY-ALARA		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		08/18/2008	08/22/2008	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		08/18/2008	08/22/2008	Baseline Inspections
1	IP 71151-OR01	Occupational Exposure Control Effectiveness		08/18/2008	08/22/2008	Baseline Inspections
1	IP 71151-PR01	RETS/ODCM Radiological Effluent		08/18/2008	08/22/2008	Baseline Inspections
1	EP2 - EP PROGRAM		1			
1	IP 7111402	Alert and Notification System Testing		09/22/2008	09/26/2008	EP Baseline Inspection
1	IP 7111403	Emergency Response Organization Augmentation Testing		09/22/2008	09/26/2008	EP Baseline Inspection
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		09/22/2008	09/26/2008	EP Baseline Inspection
1	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		09/22/2008	09/26/2008	EP Baseline Inspection
1	IP 71151-EP01	Drill/Exercise Performance		09/22/2008	09/26/2008	Baseline Inspections
1	IP 71151-EP02	ERO Drill Participation		09/22/2008	09/26/2008	Baseline Inspections
1	IP 71151-EP03	Alert & Notification System		09/22/2008	09/26/2008	Baseline Inspections

This report does not include INPO and OUTAGE activities.
 This report shows only on-site and announced inspection procedures.

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	REQUAL - BIENNIAL REQUAL					
1	IP 711111B	Licensed Operator Requalification Program	3	12/15/2008	12/19/2008	Baseline Inspections
	EB2-52B - BIENNIAL PI&R INSPECTION					
1	IP 71152B	Identification and Resolution of Problems	4	03/09/2009	03/13/2009	Baseline Inspections
1	IP 71152B	Identification and Resolution of Problems	4	03/23/2009	03/27/2009	Baseline Inspections
	EXAM - INITIAL EXAM					
1	X02412	INITIAL EXAM -FC (3/2009)	4	03/30/2009	04/03/2009	Not Applicable
	RP-ORS3 - OCCUPATIONAL RADIATION SAFETY - ALARA					
1	IP 7112101	Access Control to Radiologically Significant Areas	1	06/08/2009	06/12/2009	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls	1	06/08/2009	06/12/2009	Baseline Inspections
1	IP 71151	Performance Indicator Verification	1	06/08/2009	06/12/2009	Baseline Inspections

This report does not include INPO and OUTAGE activities.
 This report shows only on-site and announced inspection procedures.

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SUNSI Review Completed: GBM ADAMS: Yes No Initials: GBM
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