



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
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September 3, 1999

S. K. Gambhir, Division Manager
Nuclear Operations
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 NO. 50-285/99-06

Dear Mr. Gambhir:

On August 12, 1999, the NRC completed an emergency preparedness inspection at your Fort Calhoun Station. The enclosed report presents the results of this inspection. The results of this inspection were discussed on August 12, 1999, with you and other members of your staff.

The inspection was an examination of activities under your license as they relate to emergency preparedness and to compliance with the Commission's rules and regulations and with the conditions of your license. Within those areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress. Specifically, this inspection focused on performance during your biennial emergency preparedness exercise and your ability to self-assess exercise problems. No violations or findings were identified during the inspection.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Sincerely,

Original signed by

Gail M. Good, Chief
Plant Support Branch
Division of Reactor Safety

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

Enclosure:
NRC Inspection Report No.
50-285/99-06

cc w/enclosure:
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E-Mail report to T. Frye (TJF)
 E-Mail report to D. Lange (DJL)
 E-Mail report to NRR Event Tracking System (IPAS)
 E-Mail report to Document Control Desk (DOCDESK)

E-Mail all documents to Jim Isom for Pilot Plant Program (JAI)
 E-Mail all documents to Sampath Malur for Pilot Plant Program (SKM)

bcc to DCD (IE35)

bcc distrib. by RIV:

Regional Administrator	RIV File
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DRS Director	Fort Calhoun Resident Inspector
Branch Chief (DRP/C)	Branch Chief (DRP/TSS)
Project Engineer (DRP/C)	T. Essig (NRR/DIPM) (MS: 12 H2)
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 50-285

License No.: DPR-40

Report No.: 50-285/99-06

Licensee: Omaha Public Power District

Facility: Fort Calhoun Station

Location: Fort Calhoun Station FC-2-4 Adm.
P.O. Box 399, Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska

Dates: August 9-12, 1999

Inspectors: James E. Foster, Senior Emergency Preparedness Analyst
Division of Reactor Safety, Region III

Wayne C. Walker, Senior Resident Inspector, Fort Calhoun Station
Division of Reactor Projects Branch C

Paul J. Elkmann, Emergency Preparedness Analyst
Plant Support Branch, Division of Reactor Safety, Region IV

Accompanied by: Randy L. Sullivan, Emergency Preparedness Specialist, Office of Nuclear
Reactor Regulation

Approved By: Gail M. Good, Chief, Plant Support Branch
Division of Reactor Safety

Attachment: Supplemental Information

SUMMARY OF FINDINGS

Fort Calhoun Station NRC Inspection Report 50-298/99006

This report covers a 4-day period of announced inspection by two regional Emergency Preparedness Analysts and the Fort Calhoun Senior Resident Inspector. This inspection focused on the cornerstone area of Reactor Safety, Emergency Preparedness. The inspection included a review of the licensee's program for problem identification and resolution, an evaluation of plant staff performance during the biennial emergency preparedness exercise, and evaluation of the exercise critique process and conclusions.

REACTOR SAFETY

Emergency Preparedness

C No findings were identified.

Report Details

1. **REACTOR SAFETY**

1 Emergency Preparedness

1EP1 Drill, Exercise, and Actual Events

a. Inspection Scope

The inspectors reviewed the 1999 exercise's objectives and scenario to determine if the exercise would acceptably test major elements of the licensee's emergency plan. The scenario included security events, a radiological release, and several equipment failures providing a framework to support demonstration of the licensee's capabilities to implement its emergency plan.

The inspectors evaluated exercise performance, focusing on the risk-significant activities of classification, notification, protective action recommendations, and accident mitigation activities in the following emergency response facilities:

- Simulator Control Room (SCR)
- Technical Support Center (TSC)
- Operations Support Center (OSC)
- Emergency Operations Facility (EOF)

The inspectors also assessed the licensee's recognition of abnormal plant conditions, the transfer of emergency responsibilities between facilities, communications, and the overall implementation of the emergency plan.

The inspectors attended the post-exercise critiques in each of the above facilities to evaluate the licensee's initial self-assessment of exercise performance. A subsequent presentation of critique items to plant management was also attended.

b. Observations and Findings

No findings were identified related to the licensee's exercise and exercise critique process.

4OA1 Identification and Resolution of Problems

1. Inspection Scope

The inspectors interviewed members of the emergency planning staff and reviewed the licensee's self assessments, audits, corrective action program procedures, and problem identification forms (condition reports) concerning the emergency preparedness program. Areas involving condition reports received additional attention during the evaluation of exercise performance documented in Section 1EP1.

2. Observations and Findings

The inspectors noted that there had been a series of problems with the protective action recommendation process (development and communication). Further, an annual audit of the emergency preparedness program [10 CFR 50.54(t)] concluded that corrective action responses had not been "broad and lasting." Condition Report 199802100 was issued to track corrective actions. Licensee corrective actions involving protective action decision making were not fully evaluated since activities in these areas were incomplete. However, exercise performance in this area was acceptable.

The licensee had recognized that previous corrective actions in this area had not been effective. In response, several of the earlier, lower-significance condition reports were combined into a new condition report whose significance was significantly elevated. Additional analyses were initiated for the combined condition report. Condition reports initiated within the last 6 months were noted to be generally classified at higher significance levels and received root cause analyses.

No findings were identified related to the licensee's identification and resolution of problems.

4 **OTHER ACTIVITIES**

40A4 Other

(Closed) Inspection Followup Item (IFI) 50-285/9704-01: Exercise weakness related to the failure to demonstrate the ability to properly staff emergency response facilities. This IFI was processed through the Significance Determination Process and determined to have low significance. In addition, emergency response facilities were promptly staffed during this exercise.

(Closed) Inspection Followup Item (IFI) 50-285/9704-02: Exercise weakness related to the failure to adequately demonstrate implementation of on-site protective measures (issuance of potassium iodide). This IFI was processed through the Significance Determination Process and determined to have low significance. In addition, issuance of potassium iodide was actively considered during this exercise but was not recommended because calculations did not indicate the need for potassium iodide issuance.

40A5 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on August 12, 1999. The licensee acknowledged the results presented. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

G. Cavanaugh, Licensing
J. Chan, Division Manager, Nuclear Assessments
R. Clements, Manager, Maintenance
M. Frans, Licensing Manager
S. Gambhir, Division Manager, Nuclear Operations
W. Gates, Vice President, Omaha Public Power District
R. Hamilton, Manager, Chemistry
W. Hansher, Supervisor, Station Licensing
B. Hautzenrodel, Emergency Planning
R. Menz, Emergency Planning
M. Phelps, Division Manager, Nuclear Engineering
M. Reller, Emergency Planning
L. Schneider, Senior Quality Assurance Lead Auditor
H. Sefick, Manager, Security & Emergency Planning
R. Short, Assistant Plant Manager
C. Simmons, Supervisor, Emergency Planning
J. Skiles, Manager, Design Engineering
J. Solybossy, Manager, Fort Calhoun Station
D. Spires, Manager, Quality Assurance/Quality Control
M. Tesar, Division Manager, Nuclear Support Services
R. Zipfel, Manager, Cooper Station Emergency Planning

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

50-285/9704-01	IFI	Exercise weakness related to the failure to demonstrate the ability to properly staff emergency response facilities.
50-285/9704-02	IFI	Exercise weakness related to the failure to adequately demonstrate implementation of onsite protective measures (issuance of potassium iodide).

Discussed

None

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
DPR	Demonstration Power Reactor
DRP	Division of Reactor Projects
DRS	Division of Reactor Safety
EP	Emergency Preparedness
EPIP	Emergency Preparedness Implementing Procedure
ERO	Emergency Response Organization
NRC	Nuclear Regulatory Commission
NRR	Nuclear Reactor Regulation
OSC	Operations Support Center
PDR	Public Document Room
PRR	Public Reading Room
SRI	Senior Resident Inspector

LIST OF DOCUMENTS REVIEWED

Assessments and Audits

Memorandum dated April 8, 1999, "Drill Report for OSC Table Top Drills Conducted March 24, 31, and April 7, 1999." EP-99-112.

Memorandum dated March 30, 1999, "Drill Report for TSC Table Top Drills Conducted February 24, March 2 and 10, 1999," EP-99-111.

Memorandum dated August 4, 1999, "Drill Report for EOF Table top Drills Conducted February 3, 9, and 24, 1999," EP-99-065.

Emergency Preparedness Improvement Action Plan, Revision 1, undated.

Fort Calhoun Station 1999 Exercise Critique Conducted August 10, 1999, Revision 0, dated August 12, 1999.

OPPD QA Audit Report Number 4, "Emergency Response Plan And Implementing Procedures," 99-QA/QC-044, dated April 23, 1999.

Condition Reports

Condition Report 199900919, condition dated May 6, 1999, relative to protective actions, Level 3, created May 24, 1999.

Condition Report 199802028, condition dated November 16, 1998, related to automated call-out system, Level 4, created November 17, 1998.

Condition Report 199900342, condition dated February 23, 1999, related to TSC drill observations, Level 6, created March 1, 1999.

Condition Report 199802100, condition dated November 6, 1998, related to emergency planning self-assessment, Level 3, created December 2, 1998.

Condition Report 199801456, condition dated July 7, 1998, related to dose assessment, Level 3, created July 7, 1998.

Condition Report 199802105, condition dated December 1, 1998, related to protective action recommendations, Level 6, created December 2, 1998.

Root Cause Analysis for Condition Report 199900919, "Performance Problems with Dose Assessment and Emergency Notifications noted in EP Drill," SRG 99-017, dated June 18, 1999.

Procedures

Emergency Plan Implementing Procedure EPIP-OSC-1, "Emergency Classification," Revision 31, dated February 1, 1999. FC-68 No. DCR-10163.

Emergency Plan Implementing Procedure EPIP-TSC-1, "Activation of the Technical Support Center," Revision 19, dated May 2, 1996, FC-68 No. 47716.

Emergency Plan Implementing Procedure EPIP-OSC-2, "Command and Control Position Actions/Notifications," Revision 34, dated October 7, 1998, FC-68 No. 50576.