



Omaha Public Power District

444 South 16<sup>th</sup> Street Mall  
Omaha, NE 68102-2247

LIC-12-0044  
April 23, 2012

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Reference: Docket No. 50-285

**Subject: Licensee Event Report 2012-005, Revision 0, for the Fort Calhoun Station**

Please find attached Licensee Event Report 2012-005, Revision 0, dated April 23, 2012. This report is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B), 50.73(a)(2)(ii)(B), 50.73(a)(2)(v)(B) and (D), and 50.73(a)(2)(vii).

No commitments are being made in this letter.

If you should have any questions, please contact me.

Sincerely,

D. J. Bannister  
Vice President and CNO

DJB /sds

**Attachment**

c: E. E. Collins, Jr., NRC Regional Administrator, Region IV  
L. E. Wilkins, NRC Project Manager  
J. C. Kirkland, NRC Senior Resident Inspector  
INPO Records Center

<b>NRC FORM 366</b> (10-2010)		<b>U.S. NUCLEAR REGULATORY COMMISSION</b>		APPROVED BY OMB: NO. 3150-0104		EXPIRES: 10/31/2013					
<b>LICENSEE EVENT REPORT (LER)</b> (See reverse for required number of digits/characters for each block)				Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 205 55-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.							
<b>1. FACILITY NAME</b> Fort Calhoun Station				<b>2. DOCKET NUMBER</b> 05000285		<b>3. PAGE</b> 1 OF 3					
<b>4. TITLE</b> TS violation due to inadequate testing of DG fuel pumps											
<b>5. EVENT DATE</b>			<b>6. LER NUMBER</b>			<b>7. REPORT DATE</b>			<b>8. OTHER FACILITIES INVOLVED</b>		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
02	21	2012	2012	- 005	- 0	04	23	2012	FACILITY NAME	DOCKET NUMBER	
<b>9. OPERATING MODE</b>  5			<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)</b>								
			<input type="checkbox"/> 20.2201(b) <input type="checkbox"/> 20.2201(d) <input type="checkbox"/> 20.2203(a)(1) <input type="checkbox"/> 20.2203(a)(2)(i)			<input type="checkbox"/> 20.2203(a)(3)(i) <input type="checkbox"/> 20.2203(a)(3)(ii) <input type="checkbox"/> 20.2203(a)(4) <input type="checkbox"/> 50.36(c)(1)(i)(A) <input type="checkbox"/> 50.36(c)(1)(ii)(A) <input type="checkbox"/> 50.36(c)(2) <input type="checkbox"/> 50.46(a)(3)(ii) <input type="checkbox"/> 50.73(a)(2)(i)(A) <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)			<input type="checkbox"/> 50.73(a)(2)(i)(C) <input type="checkbox"/> 50.73(a)(2)(ii)(A) <input checked="" type="checkbox"/> 50.73(a)(2)(ii)(B) <input type="checkbox"/> 50.73(a)(2)(iii) <input type="checkbox"/> 50.73(a)(2)(iv)(A) <input type="checkbox"/> 50.73(a)(2)(v)(A) <input checked="" type="checkbox"/> 50.73(a)(2)(v)(B) <input type="checkbox"/> 50.73(a)(2)(v)(C) <input checked="" type="checkbox"/> 50.73(a)(2)(v)(D)		
<b>10. POWER LEVEL</b>  0			<input type="checkbox"/> 20.2203(a)(2)(ii) <input type="checkbox"/> 20.2203(a)(2)(iii) <input type="checkbox"/> 20.2203(a)(2)(iv) <input type="checkbox"/> 20.2203(a)(2)(v) <input type="checkbox"/> 20.2203(a)(2)(vi)								
<b>12. LICENSEE CONTACT FOR THIS LER</b>											
FACILITY NAME Erick Matzke									TELEPHONE NUMBER (Include Area Code) 402-533-6855		
<b>13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT</b>											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		
<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input checked="" type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE)						<input type="checkbox"/> NO			<b>15. EXPECTED SUBMISSION DATE</b>		
									MONTH	DAY	YEAR
									05	31	12
<b>ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)</b>  <p>During a QA review of surveillance procedures, an apparent failure to perform surveillance testing of the full automatic functions of the fuel oil transfer pumps was identified. Technical Specifications require monthly testing of the fuel oil transfer pumps. However, procedure changes made in 1990 removed the test of the automatic start of the fuel oil transfer pumps on low level in the Emergency Diesel Generator (EDG) day tank. Without full testing of the automatic functions of the fuel oil transfer pumps, they cannot be considered operable. Consequently, the EDGs cannot be considered operable because all auxiliary equipment to support operability has not demonstrated that it is fully capable of performing its safety function. There is reasonable assurance that the EDGs and fuel transfer pumps would function as required as the low level switches are calibrated on a refueling frequency and have functioned correctly during extended EDG surveillances. This report is being made in accordance with 10 CFR 50.73(a)(2)(i)(B), 50.73(a)(2)(ii)(B), 50.73(a)(2)(vii), and 50.73(a)(2)(v)(B) and (D).</p> <p>Corrective actions have been developed to revise the Emergency Diesel Generator surveillances to include fuel oil transfer pump surveillance testing.</p>											

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

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Fort Calhoun Station	05000285	YEAR	SEQUENTIAL NUMBER	REV NO.	2 OF 3
		2012	- 005	- 0	

**NARRATIVE**

**BACKGROUND**

Fort Calhoun Station (FCS) Technical Specifications (TS) require monthly testing of the fuel oil transfer pumps. However, procedure changes made in 1990 removed the test of the automatic start of the fuel oil transfer pumps on low level in the Emergency Diesel Generator (EDG) day tank. Without full testing of the automatic functions of the fuel oil transfer pumps, they cannot be considered operable. Consequently, the EDGs cannot be considered operable because all auxiliary equipment to support operability has not demonstrated that it is fully capable of performing its safety function.

“A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power sources, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its specified safety function(s) are also capable of performing their related support function(s).”

Monthly fuel oil transfer pump testing is required by TS 3.7(1) e. and Table 3-2, Item 12.

**EVENT DESCRIPTION**

During a Quality Assurance (QA) review of surveillance procedures, an apparent failure to perform surveillance testing of the full automatic functions of the EDG fuel oil transfer pumps was identified. Technical Specifications require monthly testing of the fuel oil transfer pumps. However, procedure changes made in 1990 removed the test of the automatic start of the fuel oil transfer pumps on low level in the EDG day tank. Without full testing of the automatic functions of the fuel oil transfer pumps, they cannot be considered operable. Consequently, the EDGs cannot be considered operable because all auxiliary equipment to support operability has not demonstrated that it is fully capable of performing its safety function.

**CONCLUSION**

A cause determination is in progress. The results of the evaluation will be published in a revision to this LER.

**CORRECTIVE ACTIONS**

Corrective actions have been developed to revise the EDG surveillance tests to include fuel oil transfer pump surveillance testing.

Additional corrective actions may be developed based on the conclusions of the cause analysis.

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**NARRATIVE**

**SAFETY SIGNIFICANCE**

Failure to fully test the automatic functions of the fuel oil transfer pumps renders the pumps inoperable. Therefore, consistent with the definition of OPERABLE, the EDGs cannot be considered operable as they rely upon the fuel oil transfer pumps to ensure an adequate fuel supply when the EDGs are performing their safety function. The EDGs have been technically inoperable in excess of TS allowed times. However, there is reasonable assurance that the EDGs and fuel transfer pumps would function as required as the low level switches are calibrated on a refueling frequency and have functioned correctly during extended EDG surveillances.

FCS TS do not contain electrical system requirements for shutdown conditions. The inoperability of the EDGs in the current operating MODE does not violate TS. The EDGs will be fully operable prior to plant restart and modes of applicability.

**SAFETY SYSTEM FUNCTIONAL FAILURE**

This event does result in a safety system functional failure in accordance with NEI-99-02.

**PREVIOUS EVENTS**

Previous events will be identified by the cause analysis and included in the supplement to this LER.