



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

bcc to DAC:ADM:
CENTRAL FILES
PDR:HQ
LPDR
~~TIC~~
NSIC

July 25, 1980

In Reply Refer To:
Docket No. 50-267/80-10

Public Service Company of Colorado
ATTN: Mr. C. K. Millen
Senior Vice President
P. O. Box 840
Denver, Colorado 80239

Gentlemen:

Thank you for your letter of June 28, 1980 in response to our letter and Notice of Violation dated June 6, 1980.

With regard to your letter, we have the following comments:

In the third paragraph of your response to Item 1, you have taken the position that the appropriate fire extinguisher was on another level below the work area and could have been accessed through an opening made by a removed section of deck grating. It is noted that the requirements of Procedure ADM-29 state that the fire extinguisher shall be at the site of welding operations. If a fire had broken out below the deck grating on which the work was in progress, the extinguisher might not have been accessible.

In your response to Item 2.b, we agree that if either breaker designation (penciled or typed) were both correct, then that part of the infraction is not valid. However, the remaining unapproved changes that had been made to SR 5.2.20b-M still constitute an infraction. It is pointed out that the necessity for the operator to pencil in breaker designations does place in question whether there is adequate procedure "clarity." Your reply does not provide the steps you have taken to prevent recurrence.

With regard to your comments concerning the increase in the items of noncompliance relating to the failure to follow procedures; the increase in inspection hours can not necessarily be concluded to have resulted in the increase in items of noncompliance. The increase in inspection hours is due to the assignment of resident inspectors. The resident inspectors are principally involved in the direct observation of licensed activities. The presence of

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Public Service Company
of Colorado

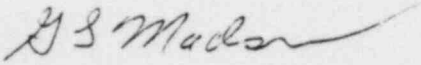
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the inspectors is intended to cause personnel to be more attentive to procedure adherence. The inspector will advise your personnel of an impending procedural violation before it occurs.

With the exception of the additional response to Item 2.b. describing the corrective action to prevent recurrence, no further action is required and no additional response is requested for the remaining items. We will review your corrective actions during subsequent inspections.

Sincerely,


G. L. Madsen, Chief
Reactor Operations and
Nuclear Supports Branch

cc:
O. R. Lee, Vice President, PSCO
D. W. Warembourg,
Nuclear Production Manager
L. Brey,
Quality Assurance