

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
REGION IV

Report No. 50-267/80-20

License No. DPR-34

Docket No. 50-267

Licensee: Public Service Company of Colorado  
P. O. Box 840  
Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

Inspection at: Fort St. Vrain Site, Platteville, Colorado

Inspection conducted: October 20-23, 1980

Inspectors: J. P. Gauden 11/21/80  
for M. I. Aneshansley, Reactor Inspector Date

J. P. Gauden 11/21/80  
for S. R. Dean, Reactor Inspector Date

Accompanying Personnel: D. P. Richardson, Engineering Aide (CO-OP Student)

Reviewed by: E. Gagliardo 11/21/80  
E. Gagliardo, Chief, Nuclear Support Section Date

Approved by: T. F. Westerman 11/21/80  
T. F. Westerman, Chief, Reactor Projects Section No.1 Date

Inspection Summary

Inspection conducted on October 20-23, 1980 (Report No. 50-267/80-20)

Areas Inspected: Routine, unannounced inspection of Quality Assurance Program, training, requalification training, and followup on previously identified items. The inspection involved 48 inspector-hours on site by two (2) NRC inspectors and one CO-OP Student.

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Results: Within the three (3) areas inspected, no items of noncompliance were identified in two areas; one item of noncompliance (equipment control procedures - paragraph 2) was identified in one area.

## DETAILS

1. Persons ContactedPublic Service Company of Colorado Employees

G. Billings, Shift Supervisor  
 C. Brewer, QA Document Clerk  
 L. Brey, QA Manager  
 W. Franek, Results Supervisor  
 \*J. Gahmm, Supervisor Technical Services  
 \*W. Hillyard, Administrative Services Manager  
 \*F. Mathie, Operations Manager  
 \*T. Orlin, Superintendent Operations QA  
 T. Prenger, Mechanical Engineer  
 \*D. Warembourg, Manager Nuclear Production  
 \*R. Wadas, Training Supervisor

\*Indicates those attending exit meeting.

The inspectors also contacted other plant personnel including reactor operators, maintenance men, electricians, technicians and administrative personnel.

2. Licensee Action on Previous Inspection Findings

(Escalated to Item of Noncompliance) Unresolved item (50-267/8012-5) - Equipment control procedures failed to provide an independent verification to ensure that necessary measures such as tagging equipment, had been implemented correctly. The equipment control provisions of P-2, issue 2, Equipment Clearances and Operating Deviations, and the "Manual of Safe Practices," provide the instructions for the licensee's program. The licensee's program was described in inspection report 80-12 and although the administrative procedure ADM-10 has been superseded by P-2, the system remained the same. It was the licensee's position that independent verification was provided by the following mechanisms incorporated in their overall management of equipment controls.

- (1) Reactor operator checked off the Standard Clearance Points form as equipment is returned to normal.
- (2) Reactor Operator's check of accountability of clearance auxiliary tags.
- (3) Shift Supervisor's check of clearance for completion.
- (4) Quality Assurance periodic audits of equipment control.

Region IV's interpretation of the "independent verification" requirement is that a second man witness or physically check the position of each valve included in the equipment control procedure. This position was referred to IE Headquarters and their position supports that of RIV. It is further noted that the licensee's program does not require all repositioned valves in a system to be tagged, but only those necessary for personnel/equipment safety. Region IV feels that all repositioned valves or circuit breakers should be controlled under the equipment control procedures.

10 CFR 50 Appendix B Criterion II states in part, the applicant shall establish at the earliest practicable time a quality assurance program. This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures or instructions.

Amendment 32 to the FSAR (Public Service Company of Colorado Approved QA Program) sets forth certain implementation dates for revising the overall quality assurance program. The licensee in a letter to the NRC dated December 17, 1976, committed to ANSI N18.7-1972 to be effective December 2, 1975.

Section 5.1.5 of ANSI N18.7-1972, "Equipment Control Procedures," requires that "Procedures shall require independent verification, where appropriate, to ensure that necessary measures, such as tagging equipment, have been implemented correctly."

The fact that the licensee's equipment control procedures did not require an independent verification of tagging measures as defined by the above NRC position constitutes an apparent violation (267-80-20-01) against the requirements stated above.

### 3. Quality Assurance Program

The inspector reviewed the licensee's QA Program which had been revised as of August 4, 1980. The inspector verified that the program incorporated the requirements of 10 CFR 50 Appendix B and the applicable regulatory requirements committed to by the licensee in the FSAR.

It was noted by the inspector that Quality Policy Q-0 stated, "each individual shall be familiar with policies, requirements and procedures set forth in the Quality Assurance Manual and shall implement those elements of the Program for which he is responsible."

As part of an NFSC Audit C-80-2, "Corrective Action" licensee's Quality Assurance Department determined that an unreasonable percentage of personnel had not received formal training on the new Quality Assurance and Administrative Procedures. It was noted by the inspector that the licensee had conducted formal training of Quality Assurance and Administrative procedures for supervisory personnel.

No items of noncompliance or deviation were identified.

#### 4. Training

Regualification Training - The purpose of this inspection was to determine that the licensed operator regualification training program is effective and in conformance with regulatory requirements. The inspector reviewed the licensee's approved regualification program and determined that the program is in conformance with regulatory requirements. The licensee indicated that a change was to be submitted to the Operator Licensing Branch (OLB) early in 1981. The licensee indicated that, because of the unique nature of their plant, they were having some difficulty in the area of operator on-the-job training (reactivity manipulations) requirements. The inspector agreed to forward a copy of this inspection report to OLB for information.

Annual Operator Regualification Examination - The annual examination was completed in May 1980. The licensee's evaluation of the results was completed in July 1980. Operators with weak areas had been identified and a schedule for regualification lectures had been provided. The annual examination addressed all areas specified in the licensee's approved regualification program; however, these areas were not consistent with 10 CFR 55 Appendix A. The licensee agreed to evaluate this difference during their review of the program revision.

Regualification Lecture Series - A schedule for regualification lectures had been prepared. The schedule contained lectures to ensure that people identified in the annual examination as weak received the required retraining. Detailed lesson plans had been prepared to support the lecture schedule. Evaluation of plant abnormalities, which occurred as late as August 1980, had been included in the regualification lecture series. These evaluations included sequence of events, detailed analysis of actual plant parameter trends and evaluation of operator response. All licensed operators and all non-licensed operators were required to attend the regualification lecture series.

Operator On-the-job-Training (OJT) - A review of training records indicated that all licensed operators routinely manipulated the controls of the facility. Procedure changes and design change reviews had been completed. The annual review of emergency procedures had been included as part of the regualification lecture series. Similiarly, facility licensee conditions and review of the technical specifications had been included in the regualification lecture series.

Operator Evaluation - The licensee had developed an operator license regualification check sheet to ensure that the performance of all licensed operators was reviewed on a periodic basis. The check sheet addressed the following areas:

- . Requalification lecture attendance and performance
- . Required reading
- . Procedure reviews
- . On-the-job training
- . Examination performance
- . Identified weak areas and corrective action

The evaluation of each licensed operator had been performed by the training supervisor and administrative services manager. The licensee agreed to evaluate the possibility of requiring a supervisor from the operations department to be a member of the review panel. The inspector noted that the evaluation of the requalification lectures (i.e., written examinations) was performed on a "periodic" basis. There were no formal requirements in place to ensure that written examinations of material presented in the lecture series were completed. The licensee agreed to address this comment in their revision to the requalification program.

Training - The purpose of this inspection was to determine whether the overall training activities for new employees and the retraining for non-licensed personnel were in conformance with technical specification requirements and commitments made by the licensee.

Initial Employee Training - The licensee had defined both general and job specific training programs for all positions in the plant staff. A review of records and interviews conducted with licensee personnel indicated that these programs had been properly implemented.

Non-licensed Personnel Retraining - The implementation of retraining for non-licensed personnel had not been completed for 1980. These retraining programs had been assigned to individual department supervisors. The plant manager had requested that each department supervisor provide a schedule of retraining for their department. At the time of the inspection, the Results Department had not submitted a schedule for retraining. Discussion with the plant manager at the exit interview revealed that he had taken appropriate action to ensure that all schedules were promptly submitted.

Non-licensed Personnel Training Evaluation - Although the licensee had a method to evaluate licensed operator training, he had not extended this evaluation technique to non-licensed personnel training. The licensee agreed to explore the possibility of utilizing a similar technique in evaluating the training of non-licensed personnel.

5. Exit Interview

An exit interview was held with those representatives of the licensee indicated in paragraph 1 on October 23, 1980, at the conclusion of this inspection. The findings noted in the previous paragraphs were discussed with and acknowledged by these representatives.