



**Public Service**

October 31, 1989  
Fort St. Vrain  
Unit No. 1  
P-89401

**Public Service  
Company of Colorado**  
P.O. Box 840  
Denver CO 80201-0840

A. Clegg Crawford  
Vice President  
Nuclear Operations

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Docket No. 50-267

SUBJECT: PSC Response to NRC  
Bulletin 88-10 Sup. 01  
"Nonconforming Molded-  
Case Circuit Breakers"

REFERENCE: (1) NRC Bulletin 88-10  
Supp. 01, dated 08/03/89,  
(G-89258)  
  
(2) PSC letter, Williams to  
Document Control Desk,  
dated March 31, 1989  
(P-89104)

Gentlemen:

In Reference (1) cited above, the Nuclear Regulatory Commission (NRC) issued Supplement 1 to Bulletin 88-10. The purpose of this supplement was to inform addressees that based on a preliminary review of responses to NRC Bulletin No. 88-10, the NRC staff had determined that many responses did not adequately satisfy the provisions of the bulletin and that some addressees may need to take additional actions. The supplement also provides specific examples of common deficiencies identified during the preliminary review of responses.

Public Service Company of Colorado (PSC) has reviewed its initial response (Reference 2) to Bulletin 88-10 to ensure that PSC responses meet the bulletin provision as clarified by this supplement. The following information is provided relative to each NRC Position.

**NRC POSITION 1:**

If CBs are traceable to an original plant construction order and the CBs were received prior to August 1983, there is reasonable assurance that the CBs are acceptable and no additional traceability is required.

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## PSC RESPONSE 1:

In PSC's evaluation of NRCB 88-10, CBs purchased prior to August 1983 were not included in the suspect group. Upon receipt of NRCB 88-10 Supp. 01, PSC again reviewed the traceability history of all CBs purchased prior to August 1983. No non-traceable CBs were found to be installed in safety-related applications. Eighteen CBs, currently in safety-related stock, were purchased prior to August 1983, are not traceable to the Circuit Breaker Manufacturer (CBM), and are not traceable to an original plant construction order. The information on these eighteen CBs was included in PSC's original response (Reference 2). No further action is required by PSC for NRC Position 1.

## NRC POSITION 2:

Visual inspection and physical examination of the CBs by the CBM is not considered adequate to meet the requested traceability provisions of Bulletin No. 88-10. Although visual inspection and physical examination by the CBM may provide a reasonable basis that the CBs have not been opened or altered in a substantial way, there is no reasonable assurance that the CBs have not been previously used or subjected to service conditions that may have adversely affected the performance capabilities of the CBs.

## PSC RESPONSE 2:

CBMs did offer to have their representatives perform visual inspections. PSC chose not to take advantage of these offers in order to ensure a timely response to the bulletin. The use of visual inspection and physical examination of the CBs was not used in PSC's final evaluation. However, information received from NUMARC and various manufacturers with guidelines for visual inspections was incorporated into PSC's overall review of NRCB 88-10. No further action is required by PSC for NRC Position 2.

## NRC POSITION 3:

Item 4 of the actions requested in Bulletin No. 88-10 applies only to CBs that were purchased and installed after August 1, 1983.

## PSC RESPONSE 3:

PSC interpreted item 4 of NRCB 88-10 to apply only to CBs that were purchased and installed after August 1, 1983. The locations of all suspect CBs purchased after this date were identified. No suspect, non-traceable CBs were found to be installed in safety-related systems. This information was included in PSC's original response to NRCB 88-10. No further action is required by PSC for NRC Position 3.

## NRC POSITION 4:

If an addressee identifies any CBs as nontraceable during the review requested by Bulletin No. 88-10, it should take appropriate corrective actions as required by Criterion XVI of 10CFR Part 50, Appendix B. As part of these corrective actions, the NRC expects addressees to assess the acceptability of all installed safety-related CBs that were procured under the same purchase orders as the nontraceable CBs.

## PSC RESPONSE 4:

During the review requested by NRCB 88-10, 27 CBs purchased between January 1, 1983, and August 1, 1988, were found to be non-traceable in safety-related stock. These CBs were tested with no failures. An additional four CBs with questionable traceability were tested. The test results of one of these four CBs was indeterminate and was treated as a failure. No non-traceable CBs purchased between January 1, 1983, and August 1, 1988, were found to be installed in safety-related applications. All test results are included in PSC's original file for response to NRCB 88-10 that is currently maintained in Records Storage at Fort Saint Vrain.

All findings related to the response to NRCB 88-10 were documented and reported to the appropriate levels of management. PSC also took steps to divert possible problems with CBs in the future, including adding purchasing and testing requirements for CBs to our Restricted Materials List. No further action is required by PSC for NRC Position 4.

## NRC POSITION 5:

In an effort to limit the number of nonconforming CBs in safety-related systems, nontraceable CBs that were installed or are being maintained as stored spares as of August 1, 1988, and that successfully pass all tests specified in Attachment 1 of Bulletin No. 88-10 are considered acceptable for use only as replacements for safety-related CBs that are found to be nontraceable during the review requested by Bulletin No. 88-10. These breakers may not be used as safety-related replacements during other activities such as planned plant modifications or routine maintenance.

## PSC RESPONSE 5:

All CBs that were identified as non-traceable and purchased subsequent to August 1983 were tested in accordance with NRCB 88-10. Thirty-one CBs were tested with only one breaker testing as indeterminate. Many of these CBs can no longer be purchased new and the existing non-traceable spares cannot be replaced.



Others have become difficult to procure. Traceable CBs of the same models are not currently in stock, making these the only spares PSC has. If failure of an installed CB would occur, the necessity to use one of these tested, non-traceable CBs may arise.

It is PSC's position that the testing performed on these non-traceable CBs is sufficient to provide reasonable assurance that these CBs will perform their safety function. Prior to installation into a safety-related system, the CBs that were tested per NRCB 88-10 will be retested per the tests required in PSC's Restricted Materials List. Upon successful completion of this testing, PSC intends to utilize these CBs. PSC, therefore, requests an exemption to this portion of Bulletin 88-10.

#### NRC POSITION 6:

For CBs stored as spares that were not procured directly from the CBM, each individual CB should be reviewed in order to establish proper traceability, regardless of the number of CBs.

#### PSC RESPONSE 6:

In PSC's initial response to NRCB 88-10, traceability was verified for all CBs that were not purchased directly from the CBM. Testing was done in accordance with NRCB 88-10 on all CB's purchased between January 1, 1983 and August 1, 1988, for which traceability could not be established. This testing documentation is on file in PSC's Records Center. No further PSC action is required.

#### NRC POSITION 7:

All safety-related CBs from the same procurement order are considered traceable provided that 1) the order was procured directly from a CBM having a quality assurance program in accordance with 10CFR Part 50 Appendix B, 2) the CBM has been audited by the addressee in accordance with Appendix B, 3) the CBs were ordered as safety-related, and 4) documented evidence has been furnished to the addressee, such as a certificate of compliance. However, if safety-related CBs were procured from a vendor other than the CBM, a certification of compliance by itself is not considered an adequate basis for establishing traceability. In such cases, traceability of individual procurement orders should be established through the review of procurement or shipping records back to the CBM. Telephone discussions with the CBM or vendor are not acceptable for establishing a basis for traceability. Traceability to a warehouse facility controlled by the CBM is considered equivalent to traceability to the CBM.

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## PSC RESPONSE 7:

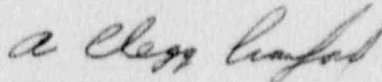
All CBs that were considered traceable in response to NRCB 88-10 were either purchased from an approved vendor having a Quality Assurance Program in accordance with 10CFR50, Appendix B, or traceability was verified by reviewing procurement and shipping records back to the CBM. Questionable traceability was considered inadequate. Those CBs purchased between January 1, 1983 and August 1, 1988, found to have questionable traceability were tested per NRCB 88-10. No further action is required by PSC for NRC Position 7.

In NRCB 88-10, Supplement 1, Item 2 of Actions Requested requires that addressees prepare and retain documentation for possible audit which indicates that appropriate actions requested by Bulletin 88-10 and this supplement have been performed as requested. Documentation related to PSC's response to NRCB 88-10 is being retained in PSC's Records Center, including documentation generated in response to this supplement.

As noted in the response to NRC Position 5, PSC is requesting exemption from Bulletin 88-10 for this position only. The testing of acquired CB's prior to installation ensures the operability of the CB. Further, since Fort St. Vrain is shutdown and will no longer be operated at power, this testing program presents no undue risk to the safety margins required during defueling and decommissioning activities.

Should you have any questions concerning this matter, please contact Mr. Mike Holmes (303) 480-6960 for further information.

Sincerely,



A. Clegg Crawford  
Vice President, Nuclear Operations

ACC/TDM/KLB/RRD:jmb

Attachments

cc: Regional Administrator, Region IV  
ATTN: Mr. T. F. Westerman, Chief  
Projects Section B

Mr. Robert Farrell  
Senior Resident Inspector  
Fort St. Vrain

October 31, 1989

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION


In the Matter

Public Service Company of Colorado  
Fort St. Vrain Unit No. 1

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## AFFIDAVIT

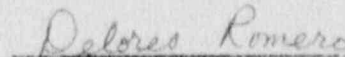
A. Clegg Crawford being first duly sworn, deposes and says: That he is Vice President, Nuclear Operations, of Public Service Company of Colorado, the Licensee herein, that he has read the information presented in the attached letter and knows the contents thereof, and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

A. Clegg Crawford  
Vice President  
Nuclear Operations

STATE OF COLORADO

COUNTY OF DENVER

Subscribe and sworn to before me, a Notary Public on this  
31st day of October, 1989.

  
Notary Public

My commission expires January 6, 1993.