



Public Service

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P.O. Box 840
Denver CO 80201-0840

January 19, 1990
Fort St. Vrain
Unit No.
P-90011

A. Clegg Crawford
Vice President
Nuclear Operations

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20553

Docket No. 50-267

SUBJECT: Response to NRC
Inspection Report 89-22

REFERENCE: NRC Letter, Collins to
Crawford, dated
12/18/89 (G-S9410)

Gentlemen:

This letter is in response to the weaknesses identified in the inspection conducted by Dr. D. B. Spitzberg during the period November 14-16, 1989 (inspection 89-22). The inspection included the implementation of the emergency plan and procedures during the annual emergency response exercise (FOSAVEX-09). No violations or deviations were identified. There were, however, several weaknesses identified in the course of the inspection. The following is PSC's response and schedule of corrective actions planned for each admitted weakness, as requested.

267/8922-01:

"The diversion early in the emergency of both the STA and SRO from activities involving evaluation, analysis, and control of reactor emergency conditions is considered an exercise weakness."

PSC Response:

PSC considers that a misunderstanding of the Control Room organization and duties was responsible for this perceived weakness, and that the following explanation will resolve this issue.

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During power operations, such as the conditions present for FOSAVEX-89, there are three Licensed Reactor Operators (LRO) in the Control Room. Two of these LROs are assigned strictly to plant evaluation, analysis, and control. The third, called a Directing Reactor Operator (DRO) maintains the administrative and overview functions associated with Control Room activities. One of the administrative functions of the DRO is to perform the necessary notifications following any non-emergency or emergency event classification. His activities, in no way, interfere with the proper evaluation, analysis, and control of the reactor and secondary plant.

Following a plant transient, or emergency situation, the Shift Supervisor responds to the Control Room to assume responsibilities and duties of the Emergency Coordinator. In order to maintain proper supervision of the LROs assigned to the "boards", by procedure, he designates someone (in this case the DRO) to perform the necessary notifications following an emergency classification.

During FOSAVEX-89, once the Operations Manager arrived and assumed the responsibilities of Emergency Coordinator, along with the arrival of the Superintendent of Operations, there were a total of five Senior Reactor Operators present in the Control Room, two of which (one LRO and the Shift Supervisor) had no auxiliary functions outside of plant evaluation, analysis, and control of reactor emergency conditions.

Based on these procedures and processes, PSC considers that there was never a lack of necessary evaluation, analysis, and control of reactor emergency conditions by a SRO, therefore, no corrective actions are planned.

The Technical Advisor (TA), upon arriving in the Control Room, performs a review of the Data Logger (plant computer) to bring him or herself "up to speed" on the emergency event. Part of this process involves discussion with counterparts in the Technical Support Center (if manned) and filling in an assessment sheet which highlights key plant parameters and conditions. This process, even though it may seem that the TA is distracted from immediate plant recovery actions, actually allows the TA to become better informed of the events which led up to the emergency situation. With this knowledge, the TA can then better assist the Control Room staff in evaluation of what took place and how to mitigate the consequences. The TA also assists the Control Room staff with technical evaluations of plant systems, responses, etc.

Again, PSC believes that this weakness is partially due to a misunderstanding of the Control Room organization, responsibilities and procedures and that this explanation should clarify the situation and as such, resolve this issue. Considering the staffing size of Fort St. Vrain and the present condition of defueling/decommissioning, no corrective actions are believed necessary or planned for this weakness.

267/8922-02:

"The failure of emergency response teams to adhere to proper health physics practices is considered an exercise weakness."

PSC Response

The first part of this observation refers to the medical response personnel not using protective gloves during the treatment of the injured individual. A thorough critique was held with the members of the medical emergency team following FOSAVEX-89. It is agreed that overall, some MP practices should have been more closely adhered to. The Emergency Medical Technician (EMT) who responded to this particular situation was briefed by the Health Physics Technician concerning contamination problems. It was the decision of the EMT, with the concurrence of the Health Physics Technician, that the injury had preference over the contamination levels reported and the EMT elected to administer first aid without the protective gloves, as the gloves may have impaired the EMT's ability to perform proper first aid. In procedure MEP-FSV, Sections 8.4.1 and 8.4.2 do not dictate that protective clothing must be worn to administer first aid. As mentioned, PSC has discussed the observation that closer attention should be given to health physics practices in future responses. No further corrective actions are planned.

The observation by the NRC Inspector of improper use of respiratory protection equipment is acknowledged. The observed individual did don his protective equipment in the wrong sequence. The plant operator donned his Anti-C hood, then his full-face Scott Air Pack. However, prior to entering the Reactor Building, the Health Physics Technician assigned to that team noticed this error. He took the steps necessary to determine that the plant operator had a sufficient face seal prior to proceeding with their assignment. It was the decision of the Health Physics Technician, based upon the immediate need for the team in the Reactor Building and the fact that the operator had a good face seal, to proceed with the team entering. Please note that the personnel involved have indicated that the NRC Inspector had left the area following the initial dress-out and was not present for the final equipment check prior to entering the Reactor Building. Therefore, the Inspector did not observe the determination that the face seal was good.

PSC agrees that the operator donned the equipment in the improper sequence. This observation will be added to the 1990 respirator protection training program to ensure personnel are aware of the potential dangers of donning protective equipment in an improper sequence. No further corrective actions are planned.

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267/8922-03

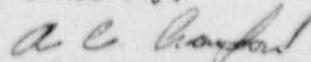
"The inadequate volume or coverage of the plant public address system was identified as an exercise weakness."

PSC Response

This concern was also identified as an exercise weakness by the PSC evaluation team and was presented as such at the post-exercise critique. PSC has evaluated the problems with the Gai-Tronics systems at Fort St. Vrain. Just prior to FOSAVEX-89, the plant's Gai-Tronics system had developed a short in one of the transmitting stations. This short caused a hissing noise to be transmitted over the entire system. This was considered to be irritating in several office and work areas. Even though PSC does not condone turning down the volume of Gai-Tronics speakers, this does occur on occasion. The Main Warehouse was investigated after FOSAVEX-89 and was found to have the volume turned low. The NEC Resident Inspector has informed us that his speaker is working properly. The short in the system was repaired and the irritating hissing noise has ceased. Gai-Tronics speakers have been returned to fully operational status. A memo from executive management will be issued to all Nuclear Operations personnel emphasizing the importance of maintaining proper Gai-Tronics coverage. Additionally, as the plant de-staffing continues, the background noise from personnel in all plant areas will decrease. No further corrective actions are planned.

If you have any questions or comments associated with this inspection response, please call Mr. M. H. Holmes at (303) 480-6960.

Sincerely,



A. C. Crawford
Vice President
Nuclear Operations

ACC/OJC/tk

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

Mr. R. E. Farrell
Senior Resident Inspector
Fort St. Vrain

Mr. Rick Hatten, Director
Division of Disaster Emergency Services
State of Colorado