

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

REGION IV

Report: 50-267/81-12

Docket: 50-267

License: DPR-34

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  
Nuclear Project Office, Denver, Colorado

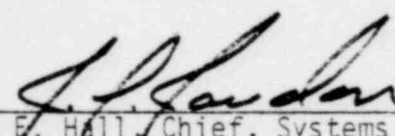
Inspection Conducted: June 1-5, 1981

Inspector:

  
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J. P. Jaudon, Reactor Inspector, Systems and Technical  
Section

6/11/81  
Date

Approved:

*for*   
\_\_\_\_\_  
R. E. Hall, Chief, Systems and Technical Section

6/11/81  
Date

Inspection Summary:

Inspection Conducted June 1-5, 1981 (Report 50-267/81-12)

Areas Inspected: Routine, unannounced inspection of off-site support and surveillance. The inspection involved 30 inspector-hours by one NRC inspector.

Results: Within the two areas inspected, no violations were noted in one area; one violation was identified in the other (violation - failure to follow procedures in the review of surveillance test results - paragraph 3).

## DETAILS

### 1. Persons Contacted

- \*L. Brey, Quality Assurance Manager
- D. Edwards, Surveillance Clerk
- E. Hill, Superintendent of Operations
- M. Holmes, Supervisor, Licensing and Administrative Services
- \*F. Mathie, Operations Manager
- \*M. McBride, Site Engineering Coordinator - Nuclear Project
- T. Orlin, Superintendent, Quality Assurance Services
- J. Reesy, Superintendent, Project Engineering
- \*L. Singleton, Superintendent, Quality Assurance Operations
- F. Swart, Nuclear Project Manager
- \*D. Warembourg, Manager Nuclear Production
- V. Wetzberger, Scheduling, Maintenance, QC and Stores Supervisor

The NRC inspector also contacted other plant personnel including administrative, clerical, engineering, operations, and Quality Assurance personnel.

\*Denotes presence at the exit interview conducted June 5, 1981.

### 2. Off-Site Support

The NRC inspector reviewed the licensee's program for off-site support. The licensee's procedure which defines organizational relationships and assigns responsibilities is Q-1 (Issue 3, 1/29/81), "FSV Organization and Responsibilities." Off-site support is essentially divided by Procedure Q-1 into two groups: Nuclear Project and Quality Assurance.

The Nuclear Project is responsible for design, design change, technical support, and license administration. Quality Assurance performs audits, follow up on corrective actions, change notice inspection, procurement verification for safety-related material and has the responsibility for records.

The NRC inspector found that the Nuclear Project was a separate organizational entity from other (non-nuclear) licensee engineering organizations and was based in its own offices in Denver. The Nuclear Project did maintain a liaison staff permanently on site to facilitate coordination. The NRC inspector determined that the Quality Assurance group, which is based on site but reports off site, contained several personnel who either hold current operator licenses or who formerly held operator licenses. Through ten interviews with engineering and Quality Assurance personnel, the NRC inspector established that these personnel possessed at least the minimum qualifications delineated in ANSI 18.1-1971 for the responsibilities assigned.

There were no violations or deviations identified in this area of the inspection, and the NRC inspector concluded that the following factors apparently contributed to the perceived success of off-site support for Fort St. Vrain:

- a. Identification of engineering support for Fort St. Vrain as a separate organizational entity from non-nuclear engineering.
- b. Maintenance of a nuclear engineering liaison group on site.
- c. The location of the entire organizationally independent Quality Assurance group on site.
- d. The inclusion of several personnel who are or were licensed operators within the Quality Assurance group.

### 3. Surveillance

The NRC inspector reviewed both the licensee's program for surveillance and completed surveillance tests. The licensee's procedure governing the control of surveillance test activities is ADM-13 (Rev. 19, 1/10/80), "Technical Specification Surveillance." With regard to the scheduling and tracking of surveillance tests, the NRC inspector found that the licensee did not strictly follow all aspects of Procedure ADM-13. The NRC inspector found that differences between licensee practice and procedural requirements in this regard were either of form, not substance, or that the licensee was exceeding the procedural requirements of ADM-13. For example, ADM-13 required the weekly schedule of surveillance tests to be in a form defined by the procedure. In practice, the schedule used was a typewritten memorandum containing the same information as was required by ADM-13. Also, ADM-13 required a weekly report on delinquent surveillance tests; however, what was used by the licensee was a mark up of the weekly schedule. The NRC inspector also found that in addition to a manually prepared schedule of surveillance tests, the licensee used a computer tracking program as a cross check. This latter method is not addressed in Procedure ADM-13. Licensee management informed the NRC inspector that a replacement procedure, P-4, was under preparation, and that Procedure P-4 would accurately delineate the scheduling and tracking system in use for surveillance tests. At the exit interview conducted June 5, 1981, licensee representatives stated that Procedure P-4 was expected to be issued and in effect within two months. This is considered to be an unresolved item pending issue of a licensee procedure which accurately describes the surveillance program (8112-01).

The NRC inspector reviewed 114 completed surveillance test procedures. Of the completed surveillance tests reviewed, 62 of them were completed on or after March 31, 1981. In 11 of these 62 surveillance tests, the NRC inspector found errors. The errors had not, by the records, been detected upon review of the surveillance tests conducted in accordance with ADM-13. The errors consisted of computational mistakes, failure to record data as required by procedure, errors in reading graphs or data

that were outside of the acceptance criteria specified by procedure. The Technical Specifications for Fort St. Vrain, paragraph 7.4.a requires in part, "Written procedures shall be established, implemented, and maintained covering . . . surveillance and test activities of safety-related equipment." Licensee Procedure ADM-13 states in paragraph 3.1.3(d), "Section 6.0, Step 6.13 requires the signature of a representative of the department responsible for the test other than the Test Conductor. His signature signifies that he had reviewed the Test Sheets, verified conformance with documented instructions and procedures, and concurs with the conclusions of the Test Conductor. Step 7.1 requires the signature of the supervisor of the department (or his designee) responsible for the performance of the test. His signature signifies that he has evaluated the test results, noted retest if required, and approves the test as performed and recorded." Contrary to this, the NRC inspector found 11 surveillance tests signed off as reviewed, which contained inaccurate, unacceptable or missing data. Thus the signatures of reviewing departmental representatives and supervisors did not signify what Procedure ADM-13 specified that such signatures were to mean. This is a violation (8112-02). The NRC inspector determined that none of these noted errors was such that a Limiting Condition for Operation had been exceeded. Specific details of the errors found on the eleven surveillance tests are included in Table 1.

The NRC inspector also reviewed licensee Audit NFSC G 80-1, "Surveillance Test Procedure Deviations," which was conducted during the summer of 1980. This audit had identified that "Supervisory and Management sign off of test records does not seem to assure adequacy and acceptability of test results." In discussion with licensee management, the NRC inspector was told that, in an effort to correct this finding, extensive Quality Control review of completed surveillance tests had been conducted from the autumn of 1980 until May 1, 1981. Licensee management further stated that the extensive Quality Control review had been stopped May 1, 1981, because the error rate on surveillance tests was essentially zero. This was consistent with the NRC inspector's findings, since nine of eleven errors found had occurred during May 1981, after Quality Control review of completed surveillance tests had been terminated.

The NRC inspector also reviewed completed surveillance tests for two other problems identified in licensee Audit NFSC G 80-1. These areas were the failure to record test equipment serial numbers and calibration data on the surveillance test procedures and failure to complete surveillance tests on time. The NRC inspector found no discrepancies in these two areas.

#### 4. Unresolved Items

An unresolved item is a matter about which more information is required in order to ascertain whether it is an acceptable item, violation, or deviation. The unresolved item disclosed in this inspection is:

<u>Number</u>	<u>Subject</u>
8112-01	Issuance of Procedure P-4

5. Exit Interview

An exit interview was conducted June 5, 1981, with those Public Service Company of Colorado personnel denoted in paragraph 1 of this report. At this meeting, the scope of the inspection and the findings were summarized.

TABLE 1

<u>Surveillance Test</u>	<u>Date Conducted</u>	<u>Error Noted</u>
5.2.10.a.1-M/ 5.2.10.a.2-M	5/1/81	raw data incorrectly processed
	3/31/81	required data not recorded
5.4.13.M	5/20/81	data recorded outside of acceptance criteria
5.5.3.e-W	5/20/81	data recorded outside of acceptance criteria
5.2.10.a.4-W	5/6/81, 5/18/81, 5/26/81	raw data incorrectly processed
5.6.2.a-W	4/21/81, 5/6/81, 5/19/81, 5/26/81	raw data incorrectly processed