

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

REGION IV

Report: 50-267/81-14

Docket: 50-267

License: DPR-34

Licensee: Public Service Company of Colorado
Post Office Box 840
Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

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

Inspection Conducted: July 6-10, 1981

Inspectors: *R. E. Hall*
J. P. Jaudon, Reactor Inspector, Systems and Technical
Section (Paragraphs 1, 2, 4, 5 & 6)

7/22/81
Date

C. E. Johnson
C. E. Johnson, Reactor Inspector, Engineering and
Materials Section (Paragraphs 1, 3 & 6)

7/22/81
Date

Approved: *R. E. Hall*
R. E. Hall, Chief, Systems and Technical Section

7/22/81
Date

Inspection Summary

Inspection Conducted July 6-10, 1981 (Report 50-267/81-14)

Areas Inspected: Routine, unannounced inspection of previous inspection findings, pipe hangers and supports, design changes, and QA program controls.

The inspection involved 62 inspector-hours by two NRC inspectors.

Results: Within the four areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

- *M. Block, Superintendent of Operations
- C. Brewer, Supervisor, Records Center
- L. Brey, Nuclear Project Manager
- *R. Craun, Acting Site Engineering Coordinator
- *J. Gahm, Quality Assurance Manager
- R. Garnhart, Design Draftsman
- *E. Hill, Operations Manager
- *J. Jackson, Supervisor QA/QC
- A. Kitzman, Clerical Supervisor
- J. Liebelt, Maintenance Supervisor
- *L. McBride, Technical Services Manager
- V. Mossman, Computer Specialist
- *J. Reesy, Supervisor, Nuclear Engineering
- *L. Singleton, Supervisor QA Operations
- D. Warembourg, Manager Nuclear Production
- V. Wetzberger, Scheduling, QC Stores Supervisor

The NRC inspectors also contacted other plant personnel including administrative, clerical, engineering, operations, and maintenance personnel.

*Denotes presence at the exit interview conducted July 10, 1981.

2. Licensee Action on Previous Inspection Findings

(Closed) 8102-01 (Violation): This violation had resulted from the licensee's failure to include any of the standard forms "N" in the records of completed requisitions as required by the licensee's Procedure Q-7. Standard forms "N" were used as purchase order attachments to designate some specific attributes of purchased material. The NRC inspector found that the licensee was, for recently completed purchase orders, including the standard forms "N" in the records of completed purchase orders. The NRC inspector also found that the licensee's procedures had been modified such that the requirement to include standard forms "N" in purchase order files was found by a combination of the following three procedures:

Q-4, Issue 3 (6/5/81), "Procurement Document Control"

Q-7, Issue 3 (4/27/81), "Control of Procured Material and Services"

MRIM-1, Issue 1 (5/7/81), "General Receiving Inspection"

This item is closed.

(Closed) 8102-02 (Violation): This violation resulted from the fact that standard forms "N" had not been provided for use during receiving inspection. The NRC inspector found that the licensee's Procedure Q-4, Issue 3 (6/5/81), "Procurement Document Control," required that copies of the standard forms "N" selected as attachments to specific purchase orders be provided with those purchase orders to both Quality Assurance and the Fort St. Vrain Storekeeper. The NRC inspector checked the files of the Receiving Inspector and found that standard forms "N" were attached to purchase requisitions so that they could be used in receipt inspections.

This item is closed.

(Closed) 8102-03 (Violation): This violation resulted from the licensee's failure to follow his Procedure Q-4, Attachment Q-4F in that, for each purchase of quality related material, the applicable criterion (e.g., 10 CFR 50, Appendix B, Criterion X) was not recorded on the Procurement Requisition Review Record. The NRC inspector found that the licensee had revised Procedure Q-4, Issue 3 (6/5/81), "Procurement Document Control," so that Attachment Q-4F was a guide and so that the specific step which had required recording of a referenced criterion was used only if applicable.

The NRC inspector had no further questions, and this item is closed.

(Closed) 8102-05 (Violation): This violation resulted from the licensee's failure to specify in Attachment Q-4B, as required by Procedure Q-4, which fuel and electronics items were safety-related. The NRC inspector found that the licensee revised Procedure Q-4, Issue 3 (3/6/81), "Procurement Document Control." It was found that Attachment Q-4B to Q-4 now delineated which fuel and electronics items were safety-related.

This item is closed.

(Closed) 8102-06 (Open Item): This item was open pending licensee action to revise and clarify procedures which indicated that NRC approval of suppliers could be obtained from NUREG 0040. The NRC inspector found that the licensee had issued Procedure MPRM-11, Issue 1 (6/29/81), "Suppliers Qualification Guide." The procedure replaced SS1M-1 and did not include the use of NUREG 0040 as did Procedure SS1M-1.

This item is closed.

(Open) 8109-01 (Open Item): The item was open pending licensee action to correct typographical errors in various procedures. The NRC inspector found that the licensee's action to correct errors in Procedures EMP-35, SOP 92-05, and I.1 was not complete. Also, the NRC inspector found that, with regard to the 22 procedures that indicated approval by PORC meeting 372 vice PORC meetings 369 and 371, the licensee had revised Procedure G-2, Issue 4 (4/17/81), "FSV Procedure System," so that an effective date was stamped on procedures in addition to the date of the approving PORC meeting. The NRC inspector concluded that this was sufficient action to preclude recurrence of an error of this type.

This item remains open pending completion of licensee action to correct Procedures EMP-35, SOP 92-05, and I.1.

(Closed) 8109-02 (Unresolved): This item was unresolved pending review of the effectiveness of licensee action to maintain the Control Room drawings in useable condition and verification that the licensee was maintaining controlled drawing sets current and accurate. During this inspection, the NRC inspector found no discrepancies in the Control Room drawings or in other sets of controlled drawings checked.

This item is closed.

3. Surveillance of Pipe Supports and Directional Restraints

a. Review of Procedures

The NRC inspector reviewed the licensee's program for surveillance and test procedures for pipe supports for compliance with licensee's Technical Specifications LCO 4.3.10 and SR 5.3.8. The NRC inspector reviewed licensee's procedures listed below:

5.3.8d-R, Issue 6, "Hydraulic Snubber Functional Test"

5.3.8a-X, Issue 18, "Hydraulic Snubbers"

MP 98-1, Issue 11, "Repair and/or Testing of Hydraulic Pipe Snubbers"

PM 98-1, Issue 4, "Inspection/Maintenance of Hydraulic Pipe Snubbers"

MP-40, Issue 4, "Hydraulic Snubber Oil Filling Procedure"

(1) Hydraulic Snubbers

The NRC inspector reviewed all procedures noted above to ascertain whether the licensee's surveillance and test procedures and schedule pertaining to Category I hydraulic snubbers were approved and in conformance with Technical Specifications and licensee program commitments.

(2) Mechanical Snubbers

There are no Category I mechanical snubbers at present. There are mechanical snubbers in safety-related areas, but because of boundaries defined, they are not classified as Category I. Redefining of the boundary is under consideration; if adopted, there will be an increase in Category I snubbers. This will include mechanical snubbers. The licensee has already prepared measures for implementing a plan for testing mechanical snubbers when these boundaries are redefined or extended.

(3) Other Pipe Supports and Directional Restraints

The NRC inspector discussed surveillance and test procedures of other pipe supports with the licensee. The licensee stated there are no surveillance test procedures and schedules pertaining to other pipe support and restraint systems. The licensee is modifying his program in accordance with IE Bulletin No. 79-14.

b. Functional Testing (Hydraulic and Mechanical Snubbers)

The NRC inspector reviewed the acceptance criteria for operability and found that the procedures were in compliance with manufacturer's service recommendations and Technical Specifications. Functional testing was being performed during this inspection; however, only three out of ten snubbers were tested because the Bergen-Patterson testing machine was shutdown because of maintenance problems. The licensee sent the remaining seven snubbers to Wyle Laboratories in Huntsville, Alabama, for completion of testing. The licensee reported to the NRC inspector that all snubbers had passed functional testing.

c. Review of Records

The NRC inspector reviewed the licensee's pipe support surveillance program records for snubbers. The procedural requirements were satisfied for visual inspection and functional testing of units. Deficiencies and corrective actions were recorded and the dispositions reviewed and documented as required. The units had been inspected and tested at the prescribed frequency. The NRC inspector also reviewed the maintenance and replacement records for snubbers. The records of replacement of units and parts have been maintained as prescribed by Procedure MP 98-1. Records of repair have also been maintained as prescribed by Procedure MP 98-1.

d. Observations

The Regional NRC inspector accompanied the Resident Reactor Inspector through different levels of the Reactor and Turbine Building. The NRC inspectors observed hydraulic, mechanical, and other pipe supports. The NRC inspectors performed a random visual inspection of pipe supports. None were visually inoperable.

e. Comments

The NRC inspector brought to the attention of the licensee minor discrepancies such as not initialing or dating inspection forms. These items were insignificant isolated cases; therefore, no violations were cited. The NRC inspector discussed these observations with a licensee representative.

There were no violations or deviations identified.

4. Design Changes

The NRC inspector reviewed the licensee's implementation of the design change program. The NRC inspector reviewed seven design change packages for modifications completed within the last year. In each package, the NRC inspector found that appropriate reviews and approvals had been conducted and that document update requirements had been identified and signed off as complete. A review of documents and drawings updated as a result of these seven design changes did not reveal any discrepancies. The NRC inspector noted that for those design changes reviewed that were initiated in 1979 or earlier, the safety evaluation did not contain the basis for the determination that the change did not constitute an unreviewed safety question. In each of these cases, however, the records package also contained a "Safety-Related Design Analysis," which did contain the basis required by 10 CFR 50.59. The NRC inspector noted that the licensee's current procedure for design changes, which was Q-3, Issue 2 (8/4/80), "Design Control System," clearly required that the basis for safety determinations be included in the safety evaluations. The NRC inspector concluded that this procedure change by the licensee had rectified the potential problem. The NRC inspector also noted an apparent typographical error in Procedure Q-3. This apparent error was in paragraphs 4.1.m and 4.1.n, which referred to Attachments Q-3E and Q-3F. There were no Attachments Q-3E and Q-3F to Procedure Q-3; but from the context of the paragraphs, it appeared clear that the referenced attachments should have been Q-3C and Q-3D.

The NRC inspector found that the licensee's backlog of design changes was very large, approximately 790. The distribution of these changes was approximately 38% in design or initial review, 24% approved and released for work on site, and 38% with the work completed but under final review by either Quality Assurance or Engineering or in document update. The NRC inspector found that the licensee had a detailed system to track the status of design changes (i.e., there were some 24 status categories).

The NRC inspector concluded that the licensee was in control of the design change process at the time of the inspection and was able to identify priority changes and move them through the design process to completion rapidly by this tracking system. The NRC inspector expressed his concern to licensee management that, despite the apparent control over the design change program, the large volume of changes outstanding constituted a potential for losing control.

There were no violations or deviations identified.

5. QA Program Controls

The NRC inspector reviewed items reported by the licensee in his letter serial P-81085 of March 4, 1981. This letter discussed the licensee's reorganization and restructure of policies and administrative procedures, which control quality related activities at Fort St. Vrain. By enclosure to this letter, the licensee pointed out 20 specific areas in which the methodology for implementing quality assurance measures was changed by the new procedures from the methodology delineated in the FSAR. The

NRC inspector's review of these 20 items was to ascertain if the changed methodology downgraded the programmatic quality requirements of the FSAR. The NRC inspector concluded from his inspection that there had been no programmatic downgrade of quality related requirements by these new procedures in the 20 specifics reviewed.

6. Exit Interview

An exit interview was conducted July 10, 1981, at the Fort St. Vrain site with the personnel denoted in paragraph 1. At this exit interview, the NRC inspectors summarized the scope of the inspection and their findings.