

APPENDIX

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

REGION IV

Report: 50-267/81-23

Docket: 50-267

License: DPR-34

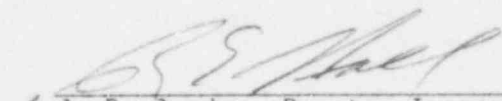
Licensee: Public Service Company of Colorado
Post Office Box 840
Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

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

Inspection Conducted: October 13-16, 1981

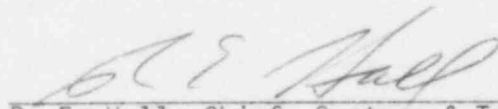
Inspector:



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

11/3/81
Date

Approved:



R. E. Hall, Chief, Systems & Technical Section

11/3/81
Date

Inspection Summary

Inspection Conducted October 13-16, 1981 (Report 50-267/81-23)

Areas Inspected: Routine, unannounced inspection of previous inspection findings; housekeeping and cleanliness program; and audit implementation. The inspection involved twenty-six inspector-hours by one NRC inspector.

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

DETAILS

1. Persons Contacted

- C. Brewer, Supervisor, Records Center
- *R. Craun, Acting Site Engineering Coordinator
- M. Ferris, QA Engineer
- *J. Gahm, Quality Assurance Manager
- *E. Hill, Operations Manager
- A. Kitzman, Clerical Supervisor
- *T. Orlin, Supervisor, Quality Assurance Services
- *L. Singleton, Supervisor, Quality Assurance Operations
- D. Warembourg, Manager Nuclear Production

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

*Denotes presence at exit interview conducted October 16, 1981.

2. Licensee Action on Previous Inspection Findings

(Closed) Open Item (8106-01): This item was open because the NRC inspector noted that, in some cases, incoming records transmitted to the records center were not accompanied by a Records Transmittal and Receiving Inspection (RTRI) form as required by Procedure Q-17. During this inspection, the NRC inspector determined that records were transmitted to the records center by form RTRI as required by Procedure Q-17, Issue 3 (8/3/81), "Quality Records." The NRC inspector also determined that Procedure G-10, Issue 2 (7/1/81), "Data Management," is the applicable procedure for the transmittal of certain records. The NRC inspector did not identify any conflicts between Procedures Q-17 and G-10 nor were any examples identified of failure to follow these procedures.

This item is closed.

(Closed) Open Item (8109-01): This item remained open pending licensee action to correct apparent typographical errors in three procedures. The NRC inspector found that Procedures EMP-35 and SOP 92-05 had been corrected and that Procedure I.1 was under revision. IE Inspection Report 50-267/81-14 addressed the remaining aspect of this item as being satisfactory.

This item is closed.

(Closed) Unresolved Item (8110-01): This item was unresolved pending licensee definition of supplemental corrective action as a result of Nuclear Facility Safety Committee (NFSC) Audit D-81-1. The underlying issue was the timeliness of licensee corrective actions. Additionally, this item was unresolved pending licensee action to complete corrective action on Quality Assurance Deficiency Report (QA-DR) 461. The NRC

inspector found that the licensee had defined a plan of action as a result of NFSC Audit C-81-1. This is discussed in detail in paragraph 4 of this report. The NRC inspector also found that the licensee had changed QA-DR 461 to Corrective Action-Action Request (CA-AR) 199 because the administrative procedures governing corrective actions had changed. The licensee had dispositioned and closed CA-AR 199. The NRC inspector had no questions concerning disposition of the CA-AR.

This item is closed.

(Open) Unresolved Item (8110-03): This item remained unresolved pending completion of a licensee review of the need for a more specific shelf life control program. The NRC inspector found that the licensee had expanded the scope of the review to all warehouse controls of material but had not completed action to resolve potential problems identified in this review.

This item remains open.

(Closed) Unresolved Item (8112-01): This item was unresolved pending licensee action to replace Procedure AMD-13 with Procedure P-4. The NRC inspector found that Procedure P-4, Issue 2 (8/20/81), "Surveillance Testing Program," had been issued and Procedure ADM-13 superseded.

This item is closed.

3. Housekeeping and Cleanliness Program

The NRC inspector reviewed the licensee's program for housekeeping and cleanliness of the facility. Licensee Procedure P-10, Issue 3 (5/18/81), "Safe Work Practices," divided plant areas into five basic cleanliness zones. The NRC inspector determined that there were clothing requirements and other prohibitions applied to some of the zones (e.g., "No Smoking"). Licensee Procedure P-8, Issue 2 (8/4/80), "Fire Fighting and Preventing," also contained specific requirements to minimize combustibles and to control fire hazards.

The NRC inspector toured the plant to verify implementation of the licensee's housekeeping and cleanliness requirements. During this tour, the NRC inspector did not identify any fire or radiological hazards which were the result of poor housekeeping. The NRC inspector concluded that the licensee's procedural requirements for cleanliness tended to be general, but the implementation of these requirements was such that cleanliness was consistent with requirements.

The NRC inspector had no additional questions in this area.

4. Audit Implementation

The NRC inspector reviewed the licensee's implementation of audits. Specific emphasis of this inspection was on the status of corrective actions resulting from audit findings.

a. Background

IE Inspection Report 50-267/81-10 reviewed the implementation of the audit program in May 1981. This inspection noted a problem with an apparent increase in overdue corrective actions and that the licensee had identified this problem also.

b. Status of Corrective Actions

The NRC inspector reviewed the licensee's Computer Report No. 17, titled, "All Open CA-ARs," dated October 9, 1981. This report tabulated open CA-ARs. CA-ARs result from audit findings requiring specific remedial actions. The report reviewed indicated that:

- There were 162 open CA-ARs.
- One hundred and fifty-two of the open CA-ARs were past their originally assigned due date (the date assigned for original response).
- One hundred and thirty-six of the open CA-ARs were past the target date assigned for completion of corrective action.

The NRC inspector also reviewed the licensee's summary report of CA-ARs prepared in accordance with licensee Procedure Q-16, Issue 2 (8/4/80), "Corrective Action Systems." This report showed that, for the past three months, the total number of open CA-ARs had decreased.

c. Problems Identified

The NRC inspector identified the following problems with the licensee's corrective action system.

- (1) The backlog of overdue items was large. Some items had been overdue for more than a year.
- (2) The licensee was not complying with all requirements of his Procedure Q-16 for the internal reporting of open CA-ARs. Specifically, the monthly report did not contain charts to indicate classification of CA-ARs by cause.
- (3) The method for trending CA-ARs by type (a requirement of licensee Procedure Q-16) was ineffective in determining trends. This problem, albeit relatively minor, was caused by the fact the trends were determined from the difference in the percentage of CA-ARs in nine categories from one month to another. The percentages used were determined by the total number of CA-ARs in each category as a percentage of all CA-ARs ever written. Since

the numbers of new CA-ARs each month was small compared to this total, the historical pattern of percentages changed so slowly that the licensee was not able to identify trends.

- (4) There was little evidence of broad management involvement or concern with overdue corrective action prior to April or May 1981.
- (5) Some "due dates" appeared to have been assigned unrealistically. For example, the correction of a problem by design change is a lengthy process. Assignment of an unachievable date for such corrective action lead to increasing the backlog of overdue CA-ARs, and in the NRC inspector's judgement, may have resulted in the perception by some licensee personnel that assigned "due dates" were not meaningful and could be ignored.

d. Licensee Actions

Licensee representatives indicated that they were taking the following actions to readdress the problems with timely corrective action completion:

- (1) The method of status keeping of CA-ARs was being revised. The stated purpose of this revision was to provide better visibility of CA-ARs to both senior licensee management and to those designated to take action until corrective actions were adequately completed and verified as satisfactory. The revision of the procedure for status keeping also included other commitments, design changes, and correspondence requiring follow up or action. Licensee representatives informed the NRC inspector at the exit interview that this revised status keeping system would be in effect by February 1, 1982. The NRC inspector observed in-progress work on this revised status keeping program and system.
- (2) All overdue CA-ARs are being reviewed by the licensee to determine if the assigned due dates are appropriate to the action outlined and if the action outlined is considered the best to correct the deficiency. The stated purpose of this review is to reduce the backlog of overdue CA-ARs and to assure that outstanding actions are appropriate. Licensee representatives stated at the exit interview that this review would also be complete by February 1, 1982.
- (3) Licensee representatives stated that Procedure Q-16 would be revised; this revision requirement had been identified but had been delayed pending the revision of Procedure G-3, "Action Request - Preparation and Processing." At the exit interview, the licensee's representative committed to have Procedure Q-16 revised and "out for approval signature" by December 15, 1981.

e. Conclusions

The NRC inspector concluded that the licensee had a significant problem with the timeliness of completion of corrective actions resulting from audit findings. The NRC inspector also concluded the licensee had identified this problem and was taking remedial action. Completion of the corrective actions outlined in paragraph 4.d above and evaluation of the licensee's effectiveness in completing corrective actions in a timely manner are considered to be an unresolved item (8123-01).

5. Unresolved Item

An unresolved item is a matter about which more information is required in order to ascertain whether or not it is an acceptable item, violation, or deviation. An unresolved item is discussed in paragraph 4 of this report (licensee actions to reduce the backlog of overdue corrective actions and to revise procedures governing status keeping of corrective actions).

6. Exit Interview

An exit interview was conducted October 16, 1981, with Messrs E. Hill and J. Gahm and other Public Service Company of Colorado personnel. At this meeting, the scope of the inspection and the findings were summarized.