In Reply Refer To: Docket: 50-267/89-22

Public Service Company of Colorado ATTN: A. Clegg Crawford, Vice President Nuclear Operations P.O. Box 840 Denver, Colorado 80201-0840

Gentlemen:

Thank you for your letters of January 19 and April 18, 1990, in response to our letter and inspection report dated December 18, 1989, and our request for additional information dated March 16, 1990. Our request for additional information concerned Emergency Exercise Weakness 267/8922-01. This weakness involved the NRC observation that both the senior reactor operator and the shift technical advisor appeared to be diverted early in the emergency from plant evaluation, analysis, and control activities.

In your responses to this finding, you assured us that control room personnel performed in accordance with assigned responsibilities and did not interfere with plant evaluations, analysis, and control activities. We agree that during this exercise, ongoing plant events did not demand the focussed attention of these individuals and their filling out of forms and making notifications had no negative consequences. Our concern is whether during a fast breaking emergency involving plant transients and/or safety system failures, these individuals' attention should be focused on plant evaluation, analysis, and control. We believe you have addressed this concern in part, by stating that had conditions changed, mitigation of emergency conditions would have taken priority over the turnover process.

We believe this issue has now been thoroughly explored and that no further information is needed at this time. However, we will review the activities of control room personnel during the next exercise to ensure that under a different set of emergency conditions, adequate evaluation, analysis, and control will be brought to bear on the changing plant conditions.

If you have any further questions or comments, please contact Dr. D. Blair Spitzberg at (817) 860-8191.

Sincerely,

Original Signed By

Samuel J. Collins, Director Division of Reactor Projects

cc: (see next page)

RIV: SEPS PBS C: SEPS X BSpitzberg/slr DPowers 5/9/90 5/9/90





9005150315 900510 PDR ADOCK 05000247

135

Public Service Company of Colorado -2-

cc: Public Service Company of Colorado ATTN: D. W. Warenbourg, Manager Nuclear Engineering Division P.O. Box 840 Denver, Colorado 80201-0840 GA International Services Corporation Fort St. Vrain Services ATTN: David Alberstein, Manager P.O. Box 85608 San Diego, California 92138 Public Service Company of Colorado ATTN: Charles H. Fuller, Manager Nuclear Production and Station Manager 16805 Weld County Road 19-1/2 Platteville, Colorado 80651 Public Service Company of Colorado ATTN: H. L. Brey, Manager, Nuclear Licensing and Resource Management Division P.O. Box 840 Denver, Colorado 80201-0840 Public Service Company of Colorado ATTN: P. F. Tomlinson, Manager Quality Assurance Division 16805 Weld County Road 19-1/2 Platteville, Colorado 80651 Public Service Company of Colorado ATTN: D. D. Hock, President and Chief Executive Officer P.O. Box 840 Denver, Colorado 80201-0840 Public Service Company of Colorado ATTN: Commitment Control Program Coordinator 2420 W. 26th Ave. Suite 100-D

Denver, Colorado 80211

Public Service Company of Colorado -3-

Kelley, Standfield & O'Donnell ATTN: Mr. J. K. Tarpey Public Service Company Building Room 900 550 15th Street Denver, Colorado 80202

Chairman Board of County Commissioners of Weld County, Colorado Greeley, Colorado 80631

Regional Representative Radiation Programs Environmental Protection Agency 1 Denver Place 999 18th Street, Suite 1300 Denver, Colorado 80202-2413

Department of Health ATTN: Robert M. Quillen, Director Radiation Control Division 4210 East 11th Avenue Denver, Colorado 80220

Colorado Public Utilities Commission ATTN: Ralph Teague, P.E. 1580 Logan Street OL1 Denver, Colorado 80203

U.S. Nuclear Regulatory Cc mission ATTN: Senior Resident Inspector P.O. Box 640 Platteville, Colorado 80651

U.S. Nuclear Regulatory Commission ATTN: Regional Administrator, Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Dr. Olson, Regional Director FEMA Region 8 Denver Federal Canter Bldg. 710 Box 25267 Denver, Colorado 80225-0267

bcc: (see next page)

Public Service Company of Colorado -4-

bcc to DMB (IE35)

*

+

bcc with licensee's letter: DRP Resident Inspector Lisa Shea, RM/ALF Division Director, DRP DRS EP File MIS System RSTS Operator RIV File Inspector Section Chief B. Beach Project Engineer, DRP P. Eilckson, NRR



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

A. Clegg Crawford Vice President Nuclear Operations

April 18, 1990 Fort St. Vrain Unit No. 1 P-90111

U			5			N	u	c	1	ea	r	č,	R	e	gi	u	1	a	t	0	ry		C	0	mm ·	1	5 5	s i	01	n	
A	T	T	N	:			D	0	c	un	e	n	t		č	0	n	t	r	0	1	D	e	5	k						
W	8	\$	h	1	n	g	t	0	n		D		C				2	0	5	5	5										

(1)

Docket No. 50-267

SUBJECT: Request for Additional Information on Exercise Weakness 267/8922-01

REFERENCES:

NRC Letter, Collins to Crawford, dated 12/18/89 (G-89410)

APR 2 3 1990

- (2) PSC Letter, Crawford to Doc. Control Desk, dated 1/19/90 (P-90011)
- (3) NRC Letter, Collins to Crawford, dated 3/16/90 (G-90036)

Dear Sirs:

This letter is in response to your request for additional information made in reference 3, regarding Exercise Weakness 267/8922-01.

(1) NRC Comment:

Early in the accident scenario the senior reactor operator, or as you have designated him, the Directing Reactor Operator, appeared to be occupied with filling out notification forms and making notification calls. Your response states that these activities in no way <u>interfered</u> with the proper evaluation, analysis, and control of the reactor. Our point was not this individual's interference with plant evaluation, but whether he should have, in fact, been participating in plant evaluation.



P-90111 Page 2 April 18, 1990

PSC Response:

NRC Information Notice No. 87-58 states "Licensees have a responsibility to provide enough on-shift personnel knowledgeable about plant operations and emergency plan implementation to enable timely, accurate, and reliable reporting of operating events without interfering with plant operations." In compliance with the aforementioned notice, during power operations at Fort St. Vrain (FSV), the Control Room has typically been staffed with three licensed reactor operators (not including the Shift Supervisor), two of whom have been assigned to plant evaluation, analysis and control. The third, the DRO, maintained the administrative functions associated with Control Room activities. Maintaining three licensed operators in the Control Room is in excess of the staffing requirements as identified in the FSV Technical Specifications. The primary duty of the DRO during emergency conditions is to perform required emergency notifications as designated by the Shift Supervisor. Actions taken by the DRO during the accident scenario were appropriate and the two other licensed operators provided adequate resources for evaluation, analysis and control of the reactor.

Past NRC inspectors have found PSC's use of the DRO position for performing emergency notifications to be an acceptable practice. During inspection 87-30, conducted by Mr. C. A. Hackney during the period of November 2-6, 1987, one of the areas of inspection included notifications and communications. The licensee notification process was found to be adequate and acceptable with no violations, deviations or findings identified. Also, during inspection 88-22, conducted by Mr. N. M. Terc, during the period of November 15-17, 1988, one of the program areas inspected included notifications of offsite agencies. Again, no violations, deviations or findings concerning this particular area were identified.

(2) NRC Comment:

It was our observation that during this period (8:08 a.m.), the Shift Supervisor was involved in briefing the arriving Operations Manager. The Operations Manager assumed the Emergency Coordinator's position at 8:15 a.m. Therefore, we believe your reference to the abundance of senior reactor operators present in the control room had no impact on the period in question in terms of plant evaluation, analysis, and control. P-90111 Page 3 April 18, 1990

PSC Response:

As noted by the NRC in Reference 3, during the time Exercise Weakness 267/8922-01 allegedly occurred, the Operations Manager and the Shift Supervisor were involved with a briefing and turnover of the Emergency Coordinator function. Neither of these management individuals believed sufficient operational activities were occurring which should preclude the turnover from taking place. Further, there were two licensed operators available that had no auxiliary functions other than plant evaluation, analysis and control. Had conditions changed, mitigation of emergency conditions would have taken priority over the turnover process.

(3) NRC Comment:

In consideration of the Fort St. Vrain operating license requirements, the present condition of your facility (defueling/decommissioning) cannot mitigate any weaknesses or concerns identified in the area of emergency preparedness until plan revisions are reviewed and approved by the NRC staff.

PSC Response:

PSC recognizes that the present condition of Fort St. Vrain has no bearing on the area of emergency preparedness until plan revisions have been made and approved by the NRC staff. As stated in our letter, P-89421, dated October 24, 1989, PSC fully intends to support the emergency preparedness plan.

Based on the above, PSC considers that necessary evaluations, analyses, and control of emergency actions were fully supported by licensed operators. Therefore, no additional controls nor corrective actions are planned.

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

Sincerely,

a. c. limps

A. C. Crawford Vice President Nuclear Operations

P-90111 Page 4 April 18, 1990

ACC/rm

1. 1

cc: Regional Administrator, Region IV ATTN: Mr. J. B. Baird Technical Assistant Division of Reactor Projects (2 copies)

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

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



January 19, 1990 Fort St. Vrain Unit No. 1 P-90011

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555 Public Service Company of Colorado P.O. Box 840 Denver CO 80201- 0840

A. Clegg Crawford Vice President Nuclear Operations

Docket No. 50-267

SUBJECT: Response to NRC Inspection Report 89-22

REFERENCE: NRC Letter, Collins to Crawford, dated 12/18/89 (G-89410)

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-89). 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.

001290044 900119 ADOCK 05000267

TEOI

P-90011

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 HP 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.

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 NRC 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 Additionally, as the plant de-staffing Gai-Tronics coverage. 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. al land

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