

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Report: 50-267/82-18

License: DPR-34

Docket: 50-257

Category: 5

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

Inspection Conducted: July 1-31, 1982

Inspectors: M. W. Dickerson
M. W. Dickerson, Senior Resident Reactor Inspector

8/9/82
Date

G. L. Plumlee III
G. L. Plumlee III, Resident Reactor Inspector

8-9-82
Date

Approved: T. F. Westerman
T. F. Westerman, Chief, Reactor Project Section A

8-11-82
Date

Inspection Summary

Inspection Conducted July 1-31, 1982 (Report: 50-267/82-18)

Areas Inspected: Routine, announced inspection of Surveillance; Maintenance; Operational Safety Verification; Follow Up of Previous Inspection Findings; and Review of Periodic and Special Reports. The inspection involved 165 inspection-hours onsite by two NRC inspectors.

Results: Within the five areas inspected, one violation was identified (Failure to Adhere to Procedural Requirement, Paragraph 4).

DETAIL

1. Persons Contacted

M. Block, Superintendent of Operations
T. Borst, Radiation Protection Manager
B. Burchfield, Results Engineering Supervisor
W. Craine, Superintendent of Maintenance
M. Deniston, Shift Supervisor
W. Franek, Nuclear Site Engineering Manager
C. Fuller, Technical Services Engineering Supervisor
J. Gahm, QA Manager
E. Hill, Operations Manager
J. Liebelt, Senior Maintenance Supervisor
M. McBride, Technical/Administrative Services Manager
H. O'Hagan, Shift Supervisor
L. Singleton, Superintendent Operations QA
J. Van Dyke, Shift Supervisor
D. Warembourg, Manager Nuclear Production
R. Webb, Maintenance Supervisor
W. Woodard, Health Physicist

The NRC inspectors also contacted other plant personnel including reactor operators, maintenance men, electricians, technicians, and administrative personnel.

2. Licensee Action on Previous Inspection Findings

(Closed) Violation (50-267/8125-04): Failure to Perform Fire Protection Surveillances at Required Frequencies. The licensee has devised and implemented a new surveillance scheduling program. The new program also included upgrading of the position of the person controlling the surveillance scheduling program and providing a more technically qualified individual.

(Closed) Violation (50-267/8206-01): Failure to Conduct Required Surveillance. The licensee has issued an Operations Order and a report form requiring evaluation in conformance with the requirements of SR 5.5.3 following a fire or a chemical spill. This will include laboratory tests of the charcoal filters associated with the reactor building ventilation exhaust filters.

(Closed) Violation (50-267/8206-02): Use of Out-Of-Date Calibration Procedure. The licensee has issued new instructions to the individual controlling surveillance scheduling regarding the use of the latest revision to a surveillance procedure.

(Closed) Violation (50-267/8209-01): (a) Valve V-6361 Open and Not Sealed. The licensee immediately closed and sealed the valve. Additionally, the frequency of SR-OP-12-M has been increased to every two weeks instead of monthly. (b) Failure to Place the Number of the Clearance on Auxiliary Tags. This matter was discussed with the individual involved.

(Closed) Unresolved Item (50-267/7613-01): Plant Operating Cycles. APM P-11 issued May 14, 1982, describes the method used for recording/calculating plant transients that may be considered operating cycles, as outlined in the Technical Specifications.

(Closed) Unresolved Item (50-267/8009-01): Responsibility for Review of Maintenance Activities for Equipment Trends. Revisions have been made to various maintenance procedures assigning this responsibility. Additionally, the establishment of equipment trend evaluation program is considered under Open Item 8012-04.

(Closed) Unresolved Item (50-267/8123-01): Audit Finding - Corrective Action Timeliness. Q-16, Corrective Action System, has undergone a major revision and has been issued for implementation. Additionally, the number of outstanding CAAR's has been reduced to approximately one-half the number outstanding at the time of the audit.

(Closed) Unresolved Item (50-267/8124-03): Storage of Instrument Calibration Records (CAAR-418). The licensee has established a system for maintaining duplicate records, thereby meeting the intent of ANSI N45.2.9-1974. The original instrument calibration records which are stored on the turbine deck of the turbine building have been divided into safety-related and nonsafety related files. Copies have been made of all safety-related instrument calibration records and sent to records storage. The record storage copies are updated upon completion of each safety-related instrument calibration by making a copy of the updated original calibration card and sending this copy to records storage for file update.

(Closed) Unresolved Item (50-267/8125-01): Fire Fighting and Fire Prevention Responsibility. APM-P-8 was revised and issued, which reflects the current organizational structure and responsibilities. Additionally, the revision to the Fire Suppression Manual has designated an individual as responsible for coordination of fire protection training.

(Closed) Unresolved Item (50-267/8206-05): Fire Suppression and Prevention Manual Revision 18. Revision 19 to the Fire Suppression and Prevention Manual was issued to remove incorrect references to outdated administrative procedures.

(Closed) Unresolved Item (50-267/8208-05): HPP-23/Time Limits for Monitoring Certain Types of Radioactive Material (CAAR-496). A revision, Issue Number 6, was issued on July 2, 1982, which incorporated the requirements of 10 CFR 20.205.

(Open) Open Item (50-267/8208-06): SOP 21-02 Revisions. Revisions to SOP 21-02 did not include the four System 46 valves that the NRC inspector had previously identified as neither being addressed on system drawing PI 46-10 nor in SOP 21-02.

3. Operational Safety Verification

The NRC inspector reviewed licensee activities to ascertain that the facility is being operated safely and in conformance with regulatory requirements, and the licensee's management control system is effectively discharging its responsibilities for continued safe operation. The review was conducted by direct observation of activities, tours of the facility, interviews and discussion with licensee personnel, independent verification of safety system status and limiting conditions for operations, and review of facility records.

Logs and records reviewed included:

- . Shift Supervisor Logs
- . Reactor Operator Logs
- . Equipment Operator Logs
- . Auxiliary Operator Logs
- . Technical Specification Compliance Logs
- . Operations Order Book
- . Operations Deviations Reports
- . Clearance Log
- . Temporary Configuration Reports
- . Plant Trouble Reports

During tours of accessible areas, particular attention was directed to the following:

- . Monitoring Instrumentation
- . Radiation Controls
- . Housekeeping
- . Fluid Leaks
- . Piping Vibrations
- . Hanger/Seismic Restraints
- . Clearance Tags
- . Fire Hazards
- . Control Room Manning
- . Annunciators

The operability of selected systems or portions of systems were verified by walkdown of the accessible portions. The NRC inspector verified the operability of the Reactor Building Drain System. No significant problems were identified during the system walkdown.

Procedures were also reviewed and implementation observed for Gaseous Effluent Release No. 666. The release appeared to have been made in a satisfactory manner.

No violations or deviations were identified.

4. Surveillance (Monthly)

The NRC inspector reviewed all aspects of surveillance testing involving safety-related systems. The review included observation and review relative to Technical Specification requirements. The surveillance tests reviewed and observed were:

SR 5.8.1abc-M Radioactive Gaseous Effluent System Test (Release No. 666)

SR 5.2.3-X Tendon Load Cell Check

SR 5.4.1.3.5.b-M Circulator Drain Pressure Test

SR 5.3.5-A Hydraulic Power System Calibration

During the NRC inspector's review of SR 5.2.3-X, which began on July 23, 1982, at 9:00 a.m. MDT, many procedural problems and examples of not having followed the procedure were identified and are listed below. The NRC inspector determined at the start of his review that no Procedure Deviation Reports (PDR's) had been included in the surveillance, which was still in progress. The surveillance requires checking three tendons for possible shifts in load cell reference points. The checks were completed for tendons CO-11.2 and CI-10.1. The remaining check of tendon CO-17.6 was partially complete.

The following problems were identified:

- *. Step 4.4, "Permission to Initiate Test," was not signed/dated. This is required by Administrative Procedure P-4, "Surveillance Testing Program," prior to starting the surveillance.
- *. Section 3.0, "Prerequisites," had not been completed. Administrative Procedure P-4 requires identifying test equipment in this section.
- *. Page 5 of 22 was not signed off by the test conductor. Procedure P-4 requires the test conductor's signature verifying that the page has been completed with all required data entered.
- *. Steps 1 and 10 required the initial and final D.A.S. load cell readouts to be recorded. This data had not been recorded.
- *. Step 7 required the load cell readings after removal of test pressure to be recorded. This data had not been recorded.
- *. Steps 5 and 6 were not performed in accordance with the surveillance. These steps related to the method of increasing pressure up to the jack lift-off point, beyond this point, and the recording of this data.
- . Surveillance was not in accordance with Specification 11-X-23, Issue B, dated April 17, 1980, in that the limit for the maximum strain of tendons with 152 wires had not been included in the surveillance. This value is 1390 kips, which for this test corresponded to approximately 8650 psig. The surveillance did incorporate the 1545 kip limit for tendons with 169 wires. Tendons CI-10.1 and CO-11.2 contained 152 wires.
- . The surveillance did not provide instructions for converting the data taken into Kips.

* Procedure Violations

- . The surveillance did not provide the necessary data sheets for recording the required data.
- . The acceptance data upper bound limit of 1.057 for tendon CI-10.1 was recorded wrong. Licensee's data sheet stated a value of 1.064.
- . Data Calculation Section III, titled "Jack and Load Cell at the Same End of the Tendon," was worded poorly. The wording was such that performance of the required calculation was not possible by reading the directions. Reference to a previously performed calculation was necessary to understand the method used to calculate the data.
- . Section 7.6 of the "Tendon Installation and Stressing Plan," was not enclosed as required by Procedure II of the surveillance. This section was found by the licensee in a copy of a previously completed SR 5.2.3-X, however, it was not evident that the entire Section 7.6 consisted of only the one page provided.
- . The surveillance makes reference to a Specification 11-X-17, however, records storage has no listing of this specification.
- . The surveillance does not incorporate a functional test of the control room alarm YAH1 11206, which monitors load cell stress and is referenced in both the Technical Specification Basis and the FSAR.
- . There was no test data in records storage for SR 5.2.3-X, which was completed on February 3, 1975. Data and graphs (original) were found in a clerical file cabinet by the licensee upon request by the NRC inspector for a copy of the currently used SR 5.2.3-X.

The NRC inspector verified that no overstressing of the tendons had occurred during performance of the surveillance that was in progress. Tendons CI-10.1 and CO-11.2 had a maximum force of 8100 psig and 8400 psig applied, respectively. The licensee has verified that none of the tendons previously tested had been overstressed due to the failure to incorporate the 152 wire limit in the surveillance.

The NRC inspector discussed the above with the licensee and informed the licensee that the failure to follow procedures, which are Technical Specification requirements, is considered a violation (8218-01). The remaining items that are not procedure violations will be classified as an Open Item (8218-02) pending the licensee's rewrite of Surveillance SR 5.2.3-X.

The NRC inspector had no further questions in this area.

5. Maintenance (Monthly)

The NRC inspector reviewed records and observed work in progress to ascertain that the following maintenance activities were being conducted in accordance with approved procedures, Technical Specifications, and appropriate Codes and Standards. The following maintenance activities were reviewed and observed:

FHP-5 Fuel Handling Procedure, "Spent Fuel Shipping," Shipment YVB-JXI-047

PTR 7-101/7-102 V-21543/V-21523 Repair in accordance with MP 16-3, "Maintenance and Repair of 1900 Series Consolidated Safety Relief Valves"

PTR 7-348 PV-21244 Repair in accordance with MP 33-2, "Maintenance and Repair of Masoneilan Valves" and MP 10-1, "Temporary Devcon Repair of Masoneilan Valves"

On July 21, 1982, the NRC inspector reviewed portions of the licensee's report 5245-C1 (computer Printout) for open Plant Trouble Report's (PTR's) over 60 days old. The NRC inspector compared this report against the licensee's Open PTR Log Book, which contained copies of all open PTR's.

The comparison by reviewing only a portion of the report by system indicated the following problems:

- . 57 PTR's included in the Log Book for systems 11, 12, 13, and 21 were not listed on the printout.
- . 15 PTR's were listed on the printout, but were not included in the Log Book.
- . The NRC inspector was aware of numerous PTR's for which the maintenance described had previously been completed, however, the PTR's are still listed as being open.
- . The printout included a column for Expected Completion Date, however, this column contained no entries.

The NRC inspector informed the licensee about the above problems, which indicate a poor scheduling capability and a backlog of safety-related PTR's. The necessity for giving priority to safety-related maintenance and minimizing a backlog of open PTR's was also discussed. The licensee informed the NRC inspector that an effort to resolve the above items would be initiated. Also, a new computer printout is being developed which, along with other information, will give the plant status

(i.e. shutdown) required for PTR completion to better aid scheduling. Minimizing the backlog of outstanding safety-related PTR's is considered an open item (8218-03).

The NRC inspector has no further questions in this area.

6. Report Reviews

The NRC inspector reviewed the following reports for content, reporting requirements, and adequacy:

Monthly Operating Information Report, June 1982

Monthly Operations Report, June 1982

Twenty-third Startup Report, February 23 through May 22, 1982

No violations or deviations were identified.

7. Exit Interview

Exit interviews were conducted at the end of various segments of this inspection with Mr. D. Warembourg, Manager, Nuclear Production, and/or other members of the Public Service Company staff. At the interviews, the inspectors discussed the findings indicated in the previous paragraphs. The licensee acknowledged these findings.

INSPECTOR'S REPORT
Office of Inspection and Enforcement

DICKERSON, M. W.

REVIEWER

T. F. WESTERMAN

INSPECTORS

G. L. PLUMLEE, III

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO.	SEQ.	MO.	YR.
Public Service Co. of Colo.	X I - INSERT	05000267	82	18	A	
	M - MODIFY				B	
	D - DELETE				C	
FORT ST. VRAIN	R - REPLACE				D	

PERIOD OF INVESTIGATION/INSPECTION							INSPECTION PERFORMED BY			ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code.)				
FROM			TO				<input checked="" type="checkbox"/>	1 — REGIONAL OFFICE STAFF	<input type="checkbox"/>	OTHER	REGION	DIVISION	BRANCH	
MO.	DAY	YR.	MO.	DAY	YR.									
07	01	82	07	31	82		2 — RESIDENT INSPECTOR				A	C	A	
								3 — PERFORMANCE APPRAISAL TEAM						

REGIONAL ACTION (Check one box only)		TYPE OF ACTIVITY CONDUCTED (Check one box only)							
<input type="checkbox"/>	1 - NRC FORM 591	<input checked="" type="checkbox"/>	02 - SAFETY	<input type="checkbox"/>	06 - MGMT. VISIT	<input type="checkbox"/>	10 - PLANT SEC.	<input type="checkbox"/>	14 - INQUIRY
<input type="checkbox"/>	2 - REGIONAL OFFICE LETTER	<input type="checkbox"/>	03 - INCIDENT	<input type="checkbox"/>	07 - SPECIAL	<input type="checkbox"/>	11 - INVENT. VER.	<input type="checkbox"/>	15 - INVESTIGATION
		<input type="checkbox"/>	04 - ENFORCEMENT	<input type="checkbox"/>	08 - VENDOR	<input type="checkbox"/>	12 - SHIPMENT/EXPORT		
		<input type="checkbox"/>	05 - MGMT. AUDIT	<input type="checkbox"/>	09 - MAT. ACCT.	<input type="checkbox"/>	13 - IMPORT		

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2790 INFORMATION				LETTER OR REPORT TRANSMITTAL DATE					
A	B	C	D													NRC FORM 591 OR REG. LETTER ISSUED			REPORT SENT TO HQ. FOR ACTION		
<input checked="" type="checkbox"/>																MO. DAY YR.			MO. DAY YR.		
1 - CLEAR																					
2 - VIOLATION																					
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4 - VIOLATION & DEVIATION																					
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MODULE INFORMATION										MODULE INFORMATION																							
REC. ORD.		MODULE NUMBER INSP.						MODULE REQ. FOLLOWUP		REC. ORD.		MODULE NUMBER INSP.						MODULE REQ. FOLLOWUP															
TYPE	NUMBER	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	SEQ. *	PRIORITY	DIRECT INSPEC. TION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	SEQ. *	PRIORITY	DIRECT INSPEC. TION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL		
B	53	07	03					A	001					B	57	17	09				A	048	068	C									
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								C												C													
								D												D													

* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

INSPECTOR'S REPORT
(Continuation)

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)													REPORT NO.		SEQ.		MODULE NUMBER						I.E.	
05000267													8218		A		561726							
													B				VIOLATION SEVERITY OR DEVIATION						SITE RELATED	
													C				1 2 3 4 5 6						A C	
													D				X						B D	

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

1.	
2.	A. Contrary to Surveillance SR 5.2.3-X, the NRC
3.	inspector determined that the required data
4.	was not being taken.
5.	
6.	B. Contrary to Administrative Procedure P-4, the
7.	NRC inspector determined that Sections 3.0 and
8.	4.0 had not been completed as required and that
9.	page 5 of 22 had not been signed by the test
10.	conductor.
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