

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado  
Fort St. Vrain

Docket: 50-267/82-27  
License: DPR-34

Based on the results of an NRC inspection conducted during the period of November 1-30, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

1. Technical Specification 7.4.a, "Procedures, Administrative Controls," states, in part, that, ". . . written procedures shall be established, implemented, and maintained . . . ."

Administrative Procedure P-4, "Surveillance Testing Program," Issue 3, dated October 26, 1981, states, in part,

"4.1.4. The person(s) assigned to conduct the Surveillance Test (Test Conductor(s)) are responsible for: . . . ."

\* \* \*

"d) Assembling test equipment, special tools and other items specified by the Test Procedure, and identifying them in Section 3.0 (Attachment P-4C) of the test, verifying each has been properly calibrated, if required."

\* \* \*

"e) . . . In addition each page of the procedure Section 5.0 shall be signed and dated by a Test Conductor . . . at the bottom of each page.

A Test Conductor's initials or signature is verification that:

- 1) Each step so marked has been completed satisfactorily
- 2) The page signed has been completed with all required data entered."

"f) Performing the test, in a functionally sequential order, and filling in the appropriate blanks provided upon step completion."

Administrative Procedure P-7, "Work Control - Maintenance on Safety-Related Equipment," Issue 4, dated March 26, 1982, states, in part,

"3.2 All Safety-Related maintenance and repair work must be performed according to documented instructions, procedures, or drawings of a type appropriate to the circumstances . . . ."

Contrary to the above, on November 30, 1982, the NRC inspector determined the following:

- . Test equipment in use during performance of Surveillances SR 5.6.1cda-A and SR 5.6.1cdb-A had not been identified in Section 3.0 as required.
- . The blank space at the bottom of the completed pages of the surveillances referenced above had not been signed/dated by the test conductor.
- . Safety-related maintenance was performed without the use of documented instructions during performance of the above surveillances.

This is a Severity Level V Violation. (Supplement I.E.) (50-267/8227-01)

2. Technical Specification 7.4.a, "Procedures, Administrative Controls," states, in part, that, ". . . written procedures shall be established, implemented, and maintained . . . ."

Maintenance Procedure MP 12-6, "Maintenance and Repair of Control Rod Drive and Orificing Assemblies," Issue 10, dated September 14, 1982, states in part,

"4.11 RAISING OR LOWERING THE 200 ASSY"

\* \* \*

"4.11.14 Attachment dynamometer between lifting plate and sling attached to crane."

\* \* \*

"4.24.4 Disconnect slack cable switch subassembly (-280) as follows:"

\* \* \*

- "d) Disconnect slack cable subassembly from closure housing (-275) by removing two 3/8 in. sockethead screws (-200-88). Once screws are removed, weight of mechanism will tend to pull entire slack cable housing down until dowel pin (-280-13) and register on housing become disengaged. When this is done, assembly can be pulled off gear box housing spindle . . .

\* \* \*

"Workman \_\_\_\_\_"

Contrary to the above, on November 17, 1982, the NRC inspector determined, during the installation of the slack cable subassembly with the 200 assembly raised, that a dynamometer was not attached as required by step 4.11.14 and the procedure section 4.24.4 for removal of the subassembly had not been signed off as required by MP 12-6.

This is a Severity Level V Violation. (Supplement I.E.) (50-267/8227-02)

Pursuant to the provisions of 10 CFR 2.201, Public Service Company of Colorado is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: December 22, 1982