

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Report: 50-267/82-27

License: DPR-34

Docket: 50-267

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: November 1-30, 1982

Inspectors:

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

12-9-82  
Date

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

12-9-82  
Date

Approved:

T. F. Westerman For  
T. F. Westerman, Chief  
Reactor Project Section A

12/13/82  
Date

Inspection Summary

Inspection Conducted November 1-30, 1982 (Report: 50-267/82-27)

Areas Inspected: Routine, announced inspection of Operational Safety Verification; Surveillance; Maintenance; Follow Up of Previous Inspection Findings; Review of Plant Operations; and Review of Periodic and Special Reports. The inspection involved 147 inspector-hours onsite by two NRC inspectors.

Results: Within the six areas inspected, two violations were identified. (Failure to follow procedures, paragraphs 4 and 5)

## DETAILS

1. Persons Contacted

M. Block, Superintendent of Operations  
T. Borst, Radiation Protection Manager  
R. Burchfield, Results Engineering Supervisor  
W. Craine, Superintendent of Maintenance  
D. Evans, Shift Supervisor  
M. Ferris, Supervisor QA Technical Support  
W. Franek, Nuclear Site Engineering Manager  
W. Franklin, Shift Supervisor  
C. Fuller, Technical Services Engineering Supervisor  
J. Gahm, QA Manager  
J. Hak, Shift Supervisor  
E. Hill, Operations Manager  
J. Jackson, QA/QC Supervisor  
J. Liebelt, Senior Maintenance Supervisor  
M. McBride, Technical/Administrative Services Manager  
F. Novachek, Technical Advisor  
H. O'Hagan, Shift Supervisor  
G. Reigel, Shift Supervisor  
T. Schleiger, Health Physics Supervisor  
L. Singleton, Superintendent Operations QA  
J. Van Dyke, Shift Supervisor  
R. Wadas, Training 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 (50-267/8217-01): Use of Combustibles in Safety-Related Areas. A memo has been posted on the construction bulletin board and discussed with the construction superintendent. In addition, flammable materials will be issued only after superintendent approval and will be signed out of and back into the construction tool room by the individual using the material. Public Service Company has also instituted similar controls for PSC personnel using flammable materials.

(Closed) Unresolved Item (50-267/7502-03): Fission Product Probe. The fission product probe was removed and shipped to General Atomic for analysis. The results indicate that radioactive contamination in the primary circuit is much lower than expected with concentrations of the key fission products, I-131 and Sr-90, far below the limits allowed by the Technical Specifications.

(Open) Open Item (50-267/8218-03): Procedure to Minimize Backlog of Safety-Related PTR's (CAAR-531). Upon the licensee's recommendation for closeout of this item, the NRC inspector performed a followup inspection and found no evidence of a reduction in the long-standing trouble reports, some of which were dated back to 1975. The NRC inspector considers this item still open.

(Closed) Open Item (50-267/8220-01): Deficiencies in OPOP's (CAAR-537). The licensee issued revisions 54 and 55 to the Overall Plant Operating Procedures (OPOP I) correcting the deficiencies.

### 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 discussions 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 was verified by walkdown of the accessible portions. The NRC inspector verified the operability of, "System 84 - Auxiliary Boiler." The problems identified during the system walkdown are being corrected by the licensee. These problems were related to valve labeling.

Procedures were also reviewed and implementation observed for Gaseous Effluent Release 742. The NRC inspector witnessed, by walkdown with the operators, all steps required to be performed prior to the release and starting of the release in accordance with SR 5.8.1abc-M. 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. 742)

SR 5.4.1.1.8.b-M Reheat Steam Temperature Scram Test

SR 5.6.1a-W Standby Diesel Generator Test

SR 5.6.1cda-A "A" Standby Diesel Generator Calibration

SR 5.6.1adb-A "B" Standby Diesel Generator Calibration

On November 30, 1982, at 7:20 a.m. MST, the NRC inspector began witnessing portions of the standby diesel generator surveillances listed above.

During performance of SR 5.6.1cda-A on the "A" diesel generator set, the NRC inspector determined the following:

- . The test equipment in use at this time (Instrument #4 test rig and Simpson test meter) had not been listed in Section 3.1, titled "Test Equipment," along with the test equipment identification number and last calibration date as required by Administrative Procedure P-4. The technicians were in the process of calibrating pressure switches using this test equipment in accordance with Section 5.6 of the surveillance test. P-4 requires the test conductor to identify test equipment in Section 3.0 and verify proper calibration prior to commencing work.
- . Completed pages of the surveillance test had not been signed/dated by the test conductor. Administrative Procedure P-4 requires the test conductor to perform the test in a functionally sequential order and fill in the appropriate blanks provided upon step completion. P-4 also requires the test conductor to sign/date the blank provided at the bottom of the page verifying that the page has been completed with all the required data entered.
- . Pressure Switch PS-9202 was isolated and maintenance was performed in an effort to unplug a portion of its sensing line where the test rig is connected without the issuance of a plant trouble report (PTR). In an effort to supply pressure from the test rig to PS-9202, the technicians determined that a portion of the

sensing line was plugged. This section of pipe was removed after isolating the sensing line and necessary repairs made to unplug the pipe without any documented instructions. Administrative Procedure P-7 requires that all safety-related maintenance and repair work must be performed according to documented instructions.

During performance of SR 5.6.1cdb-A on the "B" diesel generator set, the NRC inspector determined the following:

- . The test equipment to be used to perform Section 5.6 of the surveillance test had not been entered in Section 3.0 as required by P-4. The test equipment consisted of a pressure test rig with a 0 - 300 psig test gauge and a simpson test meter.
- . Completed pages had not been signed/dated by the test conductor as required by P-4.

The above items were discussed with the licensee and the licensee was informed that the failure to follow procedures which are Technical Specification requirements is considered a violation (8227-01).

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:

- PTR 10-520 P-2103 Repair in accordance with MP 103, "Electric Motor Removal, Repair, and Replacement Procedure"
- PTR 10-309 Control Rod Drive No. 5 Repair in accordance with MP 12-6, "Maintenance and Repair of Control Rod Drive and Orificing Assemblies"

On November 17, 1982, the NRC inspector witnessed work performed under PTR 10-309 and determined the following:

- . During maintenance on the control rod drive (CRD) requiring the 200 assembly to be lifted, no dynamometer was attached between the lifting plate and sling attached to the crane as required by step 4.11.14 of MP 12-6. No procedure deviation report (PDR) had been written authorizing a deviation from this requirement.

During maintenance on the CRD involving the installation of the slack cable subassembly, the NRC inspector determined that Section 4.35 of MP 12-6, which provides instructions for the required installation, was being signed off upon step completion as required. However, Section 4 24.4 of MP 12-6, which covered the removal of the subassembly, had not been signed off as required by MP 12-6.

The above items were discussed with the licensee and the licensee was informed that the failure to follow procedures, which are Technical Specification requirements, is considered a violation (8227-02).

The NRC inspector had no further questions in this area.

6. Review of Plant Operations

The NRC inspector reviewed the following aspects of facility operations to determine if they were being accomplished in accordance with regulatory requirements.

a. Procurement and Storage

The NRC inspector conducted an inspection of the licensee's storage areas to verify proper:

- . Receipt inspection and storage
- . Handling of nonconforming items
- . Housekeeping and environmental controls
- . Shelf-life controls

The NRC inspector audited the receipt inspection area and the store storage areas.

The following finding was noted by the NRC inspector:

- . Shelf-life control was identified as an unresolved item previously (8110-02) and remains unresolved.

The NRC inspector verified traceability and records for the following purchase orders: N-3871, N-3874, N-3957, N-4224, and N-4337.

b. Review and Audit

Plant Operating Committee Meeting 492 was attended to determine compliance with Technical Specification and other regulatory requirements. The NRC inspector verified that the licensee's followup was consistent with the meeting decisions and minutes.



The NRC inspector also witnessed portions of the quality assurance audit of procurement, receiving, storage, handling and disbursement of quality related materials and services QAA-1001-82-01 Section 4.6 to verify conformance with QC procedures.

c. Emergency Preparedness (Medical Arrangements/Drills)

The NRC resident inspectors observed the 1982 Fort St. Vrain (FSV) Medical Emergency Exercise implemented on November 16, 1982, to verify that the licensee's onsite arrangements for medical support and treatment were implemented as described in the FSV Medical Emergency Plan. The NRC resident inspectors' comments are incorporated in NRC Inspection Report 50-267/82-26.

No violations or deviations were identified.

7. Independent Verification

As discussed with the licensee by the NRC staff on December 3, 1981, the NRC Region IV office had reviewed the licensee's response to NUREG 0737, Article I.C.6, as documented in their letter P-81075 dated February 27, 1981, and considered the licensee's response to the independent verification requirements as being unacceptable. As indicated in the NRC letter, Collins to Warembourg, dated December 14, 1981, this meeting resulted in the licensee stating that a program would be developed incorporating independent verification of systems necessary for safe shutdown of the plant.

The licensee's letter P-82381, dated September 10, 1982, incorporated a final submittal of the licensee's program for independent verification followed by a supplemental response in letter P-82424, dated September 28, 1982. As indicated in the NRC letter, Madsen to Lee, dated November 18, 1982, the NRC staff is in concurrence with the licensee's program and final closeout of this item would be based on a subsequent inspection of the implementation of the licensee's program for independent verification.

The NRC inspector reviewed the licensee's independent verification program and found it to be acceptable. The NRC inspector verified that the FSV Standard Clearance Points Form in use has been modified to incorporate independent position verification and that those personnel performing this verification are qualified as required. The NRC inspector also verified from a random sampling that the "critical valves" were labeled, positioned, and sealed as required by the licensee's program.

In accordance with the above, the NRC inspector concludes that the licensee's program meets the requirements of NUREG 0737, Article I.C.6.

The NRC inspector had no further questions in this area.



8. Report Reviews

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

Monthly Operating Information Report, October 1982  
Monthly Operations Report, October 1982

No violations or deviations were identified.

9. 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  
(Continuation)  
Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT NO.		MODULE NUMBER		I.E.	SITE RELATED
05000267		8227		561726			
				VIOLATION SEVERITY OR DEVIATION		D	
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				X		B D	
				27		28	

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.)

2 Contrary to Administrative Procedures P-4 and P-7, test  
 3 equipment ~~was~~ used was not identified in the surveillance  
 4 test ~~as~~ required, the test conductor had not signed the  
 5 completed pages as required, and safety-related  
 6 maintenance was performed without ~~instructions~~ documented  
 7 instructions.

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INSPECTOR'S REPORT  
(Continuation)  
Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT NO.		MODULE NUMBER		I.E.
05009267		8227		56703		
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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.)

2 Contrary to Maintenance Procedure MP 12-6, the 200  
 3 assembly was lifted without the use of a dynamometer  
 4 and the procedure section for the removal of the  
 5 slack cable subassembly had not been signed off.