



# Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

December 20, 1982  
Fort St. Vrain  
Unit #1  
P-82550

Mr. John T. Collins  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, TX 76012

SUBJECT: Fort St. Vrain Unit No. 1  
Systematic Assessment of  
License Performance

REFERENCE: NRC Report 82-28

Dear Mr. Collins:

As a follow-up to the above referenced report and our site meeting on December 14, 1982, we have the following comments:

A. Plant Operations

As we indicated to you in our discussions, we are concerned with personnel errors and failure-to-follow-procedure events. We have taken some steps such as establishing the Plant Review Committee, reinstating QC checks of the surveillance test program, establishing the Operating Informational Assessment Group (OIAG), and placing increased emphasis on these areas in plant staff meetings. We have made a concerted effort to rewrite many of our procedures and tests to minimize the chance of errors. In spite of all these efforts, we have not been able to demonstrate any significant improvement.

As we stated, we feel that plant status has a strong influence on personnel errors due to the challenges of the plant transients, start-ups and shutdowns that we seem to face. In this respect, our exposure to these types of errors is no doubt higher than one might find throughout the nuclear industry. This has some advantages, however, in that the operating staff receives invaluable on the job experience in dealing with transients and abnormal operating conditions.

*H005.  
Return only to  
Region IV*

We believe another contributing factor is the overall decrease in experience level as a result of increasing our staff to meet new regulatory requirements.

We have taken disciplinary action on certain occasions for these types of matters. Disciplinary action must be used carefully, however, in that such action can prove to be detrimental in the long term, especially when one approaches the situation that personnel are unwilling to act for fear of making an error and exposing themselves to disciplinary action.

We indicated to you that we do not have any immediate answers to personnel errors. We will reassess our programs such as the Plant Review Committee in an attempt to improve its effectiveness, and, of course, our procedure rewrite efforts will also continue. We have also started an additional operator training program under the direction of a Shift Supervisor dedicated to the training effort. We will continue to evaluate methods of communications and corrective action concerning personnel errors and failure-to-follow procedures in an attempt to improve this area of plant operations.

B. Radiological Controls - Radiation Protection

The violations received in this area are at least partly attributable to personnel turnover and use of contract personnel on the HP staff. We are now in a much better position in having permanent personnel on the HP staff.

We also initiated a rather extensive departmental training program for the HP staff with the object of improving individual performance.

We have also requested an additional Training Instructor for 1983. If this addition to our staff is approved, we intend to fill this position with an individual with HP and radiological protection expertise to supplement our training in radiation protection for the general employee training as well as specific departmental training.

C. Radiological Controls - Radioactive Waste Management

We have no specific comments in this area, and we will continue to maintain a high level of attention in this area.

D. Maintenance

As indicated in your report, improvement has been demonstrated in this area. We agree that the quality control program and the maintenance procedures have contributed to this improvement. The area of quality control is another area of concern to us in terms of personnel turnover. We have recently experienced some loss of personnel in this area which could have some effect on overall performance.

E. Surveillance

This is an area which has received almost constant attention. We have rewritten the major portion of our surveillance test procedures and are continuing our efforts to complete a total review of surveillance procedures.

We fully intend to maintain a high level of attention in this area. With the high level of activity in this area (some 4000 surveillance tests are conducted each year) it is virtually impossible to eliminate all errors.

F. Fire Protection

We have no specific comment in this area.

G. Emergency Preparedness

This has been a very difficult area, especially for Fort St. Vrain. As we indicated almost all of the guidance and regulating action issued by the NRC was directed toward the LWR technology. In addition, the guidelines and regulations have been a moving target, and to some extent are still moving targets today. Many areas are still subject to a certain amount of over-kill or over-reaction in terms of benefits realized versus economic impact.

We have initiated many changes as a result of the emergency appraisal audit, and we will continue to apply the appropriate level attention to this area.

H. Security and Safeguards

As we indicated to you at our site meeting, we do not agree with your recommendations concerning corporate security. We believe this comment originated as a result of some specific instances which have subsequently been corrected.

Our corporate security is involved via participation on the Fort St. Vrain Security Committee, membership in the Nuclear Facilities Safety Committee, and participation in security audits. We do not see the necessity or the benefit of any further involvement at this time.

Based on our recent telephone conversation, we will review our security plan and make revisions, if necessary, to clarify the position of the Manager of Risk Management.

I. Refueling

We have no specific comment.

J. Licensing Activities

As we discussed, we believe we have been assertive in our interaction with the NRC staff. We have on numerous occasions commented on issues before the fact, during official comment periods and after the fact all with about equal success. Although we were successful in few specific areas, our overall efforts have, in general, been unsuccessful.

We recognize the difficulty in trying to accommodate one gas-cooled reactor in a light water reactor oriented industry. In this respect, we will continue our efforts in this area. We are hopeful that the recent regionalization of Fort St. Vrain will serve to the benefit of both PSC and the NRC in this area.

K.2. Conclusions

In the design, design changes and modifications area, we believe the recent reorganization has served to improve the relationship between the nuclear engineering division and the nuclear production division. Perhaps there is still room for further improvement as indicated by the specific areas that were discussed at the site meeting. We will evaluate these areas further.

V. Investigations and Allegations

Your report 82-13 had some minor errors which we would like to correct.


Of the three individuals (C, D, and E) identified, individual E was associated with drug use only by inference of friendship with individuals C and D. Individual E denied using drugs which was subsequently corroborated by the results of a drug screening test. Individuals C and D admitted to social, off-the-job use of drugs. The report (82-13) is not very clear as to on-the-job versus off-the-job use. The report also indicates that the individuals C and D refused to take drug screening tests which is not the case. Both of these individuals did in fact take drug screening tests which were utilized to corroborate the admission of social use.

The report makes reference to a rehabilitation program which infers a structured program. For clarification please be aware that there is no structured rehabilitation for a social user of marijuana. The program consists primarily of periodic drug screening tests over a period of time to confirm discontinued use. Some counseling is available if the individual needs some help.

General

Overall, We appreciated the opportunity to meet with you, and we believe the exchange of information and thoughts was beneficial. We are looking forward to working with you under the new regionalization concept, and hopefully we will be able to demonstrate improvement in those areas of concern in the upcoming year.

Very truly yours,

  
Don W. Warembourg  
Manager, Nuclear Production  
Fort St. Vrain Nuclear  
Generating Station

DWW/skr