

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-267/82-20

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 Generation Station

Inspection at: Fort St. Vrain Site, Platteville, Colorado

Inspection Conducted: August 1-31, 1982

Inspectors: *G. L. Plumlee, III / for* 9-2-82  
M. W. Dickerson, Senior Resident Reactor Inspector Date

*G. L. Plumlee, III* 9-2-82  
G. L. Plumlee III, Resident Reactor Inspector Date

Approved: *T. F. Westerman* 9/10/82  
T. F. Westerman, Chief, Reactor Project Section A Date

Inspection Summary

Inspection Conducted August 1-31, 1982 (Report: 50-267/82-20)

Areas Inspected: Routine, announced inspection of Surveillance; Maintenance; Operational Safety Verification; Follow Up of Previous Inspection Findings; Review of Plant Operations; Procedures; and Review of Periodic and Special Reports. The inspection involved 192 inspection-hours on-site by two NRC inspectors.

Results: Within the seven areas inspected, no violations or deviations were identified.

## DETAILS

1. Persons Contacted

M. Block, Superintendent of Operations  
T. Borst, Radiation Protection Manager  
B. Burchfield, Results Engineering Supervisor  
W. Craine, Superintendent of Maintenance  
D. Evans, Shift Supervisor  
W. Franek, Nuclear Site Engineering Manager  
W. Franklin, Shift Supervisor  
C. Fuller, Technical Services Engineering Supervisor  
J. Gahm, QA Manager  
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. Redmond, Maintenance Quality Control 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 (50-267/8126-02): Health Physic's technician failed to log into radiation permit area and was not wearing the required pocket dosimeter. The individual involved was reinstructed in the proper use of RWP's and the responsibilities associated with RWP use. Additionally, all HP technicians were retrained in the procedures and responsibilities associated with an RWP.

(Closed) Violation (50-267/8126-03): The PCRV auxiliary piping system equipment clearance for a modification performed on the helium penetration interspace for B-2-3 steam generator module was returned and the system returned to normal operation without meeting the system's seismic requirements. Additionally, a quality control technician initialed and dated the verification for the correct installation of a pipe support even though it had not been installed.

The licensee is providing an additional review for those cases where the system must be returned to service prior to final completion of the work package and the shift supervisor must obtain approval before placing the system in operation if all signatures are not on the CWP. The importance and necessity of following procedures was reviewed and emphasized with the entire QA/QC inspection staff. The verbal reemphasis was followed by an intradepartment memo.

(Closed) Violation (50-267/8208-02): The controlled area established on level 5½ of the reactor building at the area around PCRV penetration B-5 was not adequately surveyed, a control point was not established, and the posting was not in accordance with approved procedures. Health Physics Procedure HPP-9 has been revised and all areas in the plant posted accordingly. Additionally, Health Physic's personnel have received training on the revised requirements.

(Closed) Violation (50-267/8208-03): A valve was improperly positioned following verification by Surveillance SR 5.8.1abc-M of proper valve positions, which caused an overpressurization of the vacuum tank T-6301. This resulted in the rupture of the tank's rupture disk and subsequent release of gaseous and airborne particulate effluents for which an isotopic analysis had not been made. Surveillance SR 5.8.1abc-M was rewritten to include independent verification of valve positions.

(Closed) Violation (50-267/8208-04): Recorder RR 93256, "Effluent Activity Monitors" had not been reading properly. The weekly Surveillance Procedure SR-OP-18-W was revised to require a signoff for every shift rather than once a day.

(Closed) Unresolved Item (8116-03): Startup book checklist inconsistencies. Revision 54, dated August 20, 1982, to the Overall Plant Operating Procedure (OPOP) Intro contained a policy statement clarification on checklist selection and use. Revision 53, dated April 15, 1982, to the OPOP revised the system checklist for OPOP VII, "Recovery From Reactor Scram."

(Closed) Unresolved Item (8118-02): Fire protection system valve position inconsistencies. A revision dated June 24, 1982, was made to SR 5.2.10.b.1-M adding valves V-45882 and V-45895 to the valve position verification list.

(Open) Unresolved Item (8124-06): Review and rewrite of surveillance tests. This item will remain open until the licensee's rewrite of all Technical Specification surveillances has been completed. The NRC inspector was informed on August 25, 1982, that 50 surveillances remained to be rewritten and should be completed by the end of September.

(Closed) Open Item (8208-01): RWP controls. Revision 7, dated July 22, 1982, was made to Administration Procedure P-1 and requires operations personnel to contact HP prior to entering a radiation or contaminated area.

(Closed) Open Item (8209-03): Delta-ferrite control of welds. Acceptability of the weld was documented and evaluated on NCR 82-22. WPS-8S-1 was revised June 22, 1982, to prevent recurrence of this problem.

During a review of the OPOP on August 24, 1982, as a result of followup on unresolved item 8116-03, the NRC determined the following deficiencies.

- OPOP Intro, page 2 of 9 under Section A, as worded is unclear as to where or when the SLO is to sign/date verifying that the applicable LCO's are not violated.
- OPOP Intro, page 2 of 9 under Section B, refers to signing the system checklist in OPOP VIII. This appears to be in error and should reference OPOP VII.
- OPOP I, pages 172 thru 183, contain asterisks in the tables; however, there is not a note explaining what the asterisk means.
- The note on page 191 of OPOP I apparently should be on page 190 of OPOP I.
- The note on page 171 of OPOP I apparently should be on page 170 of OPOP I.

The above items were identified to the licensee. The licensee was informed that this is considered an open item. (8220-01)

The NRC inspector had no further questions in this area.

### 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 ventilation system. The problems identified during the system walkdown were corrected by the licensee.

Procedures were also reviewed and implementation observed for Gaseous Effluent Release No. 674. The release appeared to have been made in a satisfactory manner.

On August 10, 1982, during the NRC inspector's review of the Temporary Configuration Report (TCR) Log, numerous conflicts were identified between a new computer index list and what was actually filed in the TCR log.

This was brought to the licensee's attention and the necessary corrections were made. The licensee stated that a more thorough weekly review of the TCR log would be performed.

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. 674)

SR 5.8.1cd-Q Radioactive Gaseous Effluent System Calibration

SR 5.4.1.3.6.b-M Circulator Seal Malfunction Test

SR 5.4.11-M PCRV Surface Temperature Indicators Functional Test

No violations or deviations were identified.

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-056

PM 48.1 Semi-Annual Preventive Maintenance on the ACM Diesel Generator Set

PTR 8-45 MSS 149 Repair in accordance with MP 98-1, "Repair and/or Testing of Hydraulic Pipe Snubbers"

RCP-30 Isotopic Calibration of Gaseous Activity Monitors in accordance with SR 5.8.1cd-Q

CN 1042B/CWP 82-142 Replace Roller Chain Flexible Coupling with Para-Flex Couplings on Hydraulic Power Supply Pump Shafts

CN 1449/CWP 82-52 Add Hi-Selectors and Isolation Amplifiers Between the Water Turbine and Steam Turbine Control Systems (Circulator 1A)

No violations or deviations were identified.

6. Review of Plant Operations

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

a. Training

On August 17, 1982, the NRC inspector attended a lecture for technical advisors and license candidates titled "Nuclear Instrumentation and Radiations Monitors" to:

- . verify lesson plan objectives were met
- . verify training was in accordance with the approved operator training requirements

On August 30, 1982, the NRC inspector reviewed the QA/QC inspector's training records to verify that the licensee's qualification requirements were being implemented.

b. Review and Audit

Plant Operating Committee meeting 477 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.

No violations or deviations were identified.

7. Procedures

Upon request from Region IV, in accordance with memo: Stone to Gagliardo, dated April 19, 1982, the NRC inspector performed a field test on the newly developed "Checklist for Evaluating Emergency Operating Procedures NUREG/CR-2005." The NRC inspector's comments on the effectiveness of this checklist were submitted to the regional office August 9, 1982.

During the review of the licensee's Emergency Procedures (EP's) using this checklist, the NRC inspector determined that EP R, "Loss of Access to Control Room," references a procedure, "I-49 Operation Instructions," for remote shutdown of the plant at panel I-49; however, the procedure apparently does not exist. (8220-02)

During the review of EP B-1, "Reactor Scram (Without Two Loop Trouble)," the NRC inspector identified titles and numbers of referenced documents that were incorrectly referenced in Table B-1. It appeared that Table B-1 had not been updated to reflect the newly revised emergency procedures. (8220-03)

The above items were discussed with the licensee and the licensee was informed that these items are considered open items (8220-02) and (8220-03), respectively.

The NRC inspector had no further questions in this area.

8. Reserve Shutdown System Problems

On August 4, 1982, the NRC inspector determined that a special surveillance SR 5.1.2ad-Q, "Reserve Shutdown (RSD) Hopper Pressure Test," performed on the night of August 3, 1982, indicated that the RSD rupture disk in the RSD hopper for Region 27 had ruptured. This same surveillance also indicated that the Region 5 RSD hopper was operable after having been determined inoperable on June 17, 1982, due to the inability to actuate the Shutdown Hopper Pressure High Alarm (10 psi) as required by the surveillance. Technical Specifications allow power operation with one inoperable hopper in each of the two RSD subsystems.

Procedure Deviation Report (PDR) 82-246 written August 3, 1982, allowed the pressurization of the Region 5 and 27 hoppers to a higher  $\Delta P$  than normal but not greater than the setpoint for PDIS-1101, which prevents pressurizing the test header to a pressure such that rupture of the disk would be possible. This resulted in the correct  $\Delta P$  indication and actuation of the Shutdown Hopper Pressure High Alarm for Region 5 verifying its operability. However, the surveillance data



indicated that no  $\Delta P$  was achieved for Region 27 nor did the Shutdown Hopper Pressure High Alarm actuate as required. This failure to achieve a  $\Delta P$  indication across the Region 27 rupture disk indicates an apparent ruptured rupture disk.

The licensee has provided the NRC inspector with a chronological listing of events leading to the belief that reserve shutdown material is present in Region 27 and is as follows:

<u>DATE</u>	<u>EVENT</u>
" Mid-July	- General Atomic Company (GAC) indicates the presence of a high negative RPF discrepancy in Region 27.  - PSC assumes that a crossflow of cool gas from surrounding regions is causing the discrepancy.
" 7/23/82	- PSC performs a crossflow test on Region 27 based on the theory that the actual temperature change associated with a given orifice position change will differ from that predicted due to a simultaneous change in crossflow. The results of this test were inconclusive because the cold steam temperatures in the nearest S/G module (B-2-1) prevented opening the orifice valve enough to obtain significant information." B-2-1 temperature problem is due to a leaking steam generator module feedwater trim valve TV-2228-1.
" 7/28/82	- PSC investigates the possibility of Reserve Shutdown material being present in Region 27. A check of the most recent Reserve Shutdown Hopper Pressure Test Surveillance (SR 5.1.2ad-Q) performed on June 17, 1982, revealed successful results for Region 27.
" 7/29/82	- PSC investigates the trend in the reactivity discrepancy as calculated in SR 5.1.4w-P. A significant increase in the negative direction for the value calculated on June 24, 1982, was observed, but the poison concentrations at the time were not in equilibrium. Subsequent values continued on the same trend, however, and PSC management was informed.
" 8/2/82	- GAC indicates that GUAGE runs made assuming the presence of Reserve Shutdown material in Region 27 agree well with the power distribution observed.

- "8/3/82 - PSC performs a special Reserve Shutdown Hopper Pressure Test Surveillance and Region 27 fails.
- PSC requests that GAC provide a calculated power distribution based on the assumption that Reserve Shutdown material is present in Region 27 so that the comparison region data can be updated.
- "8/4/82 - PSC requests that GAC provide a preliminary assessment of operation with Reserve Shutdown material in Region 27 and a proposal to analyze the long term effects.
- "8/5/82 - PSC receives the calculated power distribution requested on August 3, 1982, and updates comparison region data.
- "8/6/82 - PSC receives preliminary assessment and proposal requested on August 4, 1982. Preliminary assessment reveals no immediate concern and that operation need not be precluded for at least four to six weeks.
- "8/10/82 - PSC authorizes work proposed by GAC on August 6, 1982."

As of August 31, 1982, the licensee's plans are to remove the RSD Material during the next scheduled outage in January 1983. However, this depends on future recommendations received from GAC's analysis. Other external factors might possibly move the shutdown to as early as November 1982.

The NRC inspector is presently monitoring core performance on a daily basis.

The NRC inspector has no further questions in this area.

9. Report Reviews

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

Monthly Operating Information Report, July 1982

Monthly Operations Report, July 1982

No violations or deviations were identified.

10. 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.

## ATTACHMENT B

## OPEN ACTION ITEMS LIST

Date: September 2, 1982

Type Code: A=Allegation  
 B=Bulletin  
 C=Circular  
 D=Deviation  
 E=50.55(e)  
 L=LER

M=Miscellaneous  
 O=Open Item  
 R=Part 21 Report  
 T=Temporary Instructions  
 U=Unresolved Item  
 V=Violation

Docket No: 267  
(8)

Note - Max characters allowed for each entry shown in (1)

1	2	3	4	5	6	7	8
Type Item (1)	Item No. (8)	Report Paragraph (6)	Responsible Section (4)	Module (7)	Description (186)	Update/Closeout Report (30)	Status Code (1)
0	8220-01	2	PB-A	92702	Overall Plant Operating Procedure deficiencies identified		
0	8220-02	7	PB-A	42700	The licensee's emergency procedures reference a procedure that does not exist.		
0	8220-03	7	PB-A	42700	Table B-1 references documents incorrectly.		
V	8126-02	2.B	PB-A	71707		8220	C
V	8126-03	4.A	PB-A	62703		8220	C
V	8208-02	3.b	PB-A	71708		8220	C
V	8208-03	3.c	PB-A	71708		8220	C
V	8208-04	3.d	PB-A	71708		8220	C
U	8116-03	10.A	PB-A	71711		8220	C
U	8118-02	3.B	PB-A	71707		8220	C
U	8124-06	2	PB-A	61700		8220	
0	8208-01	3.b	PB-A	71708		8220	C
0	8209-03	5.b	PB-A	62703		8220	C

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. FORT ST. VRAIN	I - INSERT M - MODIFY D - DELETE R - REPLACE	05000267	8220	A			

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			1 - REGIONAL OFFICE STAFF				OTHER			REGION	DIVISION	BRANCH
MO.	DAY	YR.	MO.	DAY	YR.	<input checked="" type="checkbox"/> 2 - RESIDENT INSPECTOR							4	C	A
08	01	82	08	31	82	3 - PERFORMANCE APPRAISAL TEAM									

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

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2,790 INFORMATION				LETTER OR REPORT TRANSMITTAL DATE						
A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D	MO.	DAY	YR.	MO.	DAY	YR.	
<input checked="" type="checkbox"/>																						
1 - CLEAR				1 - YES				1 - YES				NRC FORM 591 OR REG. LETTER ISSUED				REPORT SENT TO HQ FOR ACTION						
2 - VIOLATION												SEP 16 1982										
3 - DEVIATION																						
4 - VIOLATION & DEVIATION																						

MODULE INFORMATION												MODULE INFORMATION																			
REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSP. EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	MODULE REQ. FOLLOWUP					REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSP. EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	MODULE REQ. FOLLOWUP				
TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL						TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER						LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER
B	530703B				A	003					B	571707					A	038100C													
B	552700				A	021100P					B	571709					A	037100C													
B	561726				A	010100C					B	571713					A	008005													
B	562703				A	009100C					B	590713					A	001100C													

\* CIRCLE EQUEN: E IF VIOLATION OR DEVIATION

NRC FORM 700  
(11-81)  
IE MC 0536

U.S. NUCLEAR REGULATORY COMMISSION

PRINCIPAL INSPECTOR (Name, last, first, and middle initial)

DICKERSON, H.W.

REVIEWER

INSPECTOR'S REPORT  
Office of Inspection and Enforcement

INSPECTORS

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO.	SEQ.	MO.	YR.
	I - INSERT	05000267	8220	A		
	M - MODIFY			B		
	D - DELETE			C		
	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			1 - REGIONAL OFFICE STAFF			OTHER			REGION		DIVISION		BRANCH	
MO.	DAY	YR.	MO.	DAY	YR.												

REGIONAL ACTION (Check one box only)			TYPE OF ACTIVITY CONDUCTED (Check one box only)															
1 - NRC FORM 581			02 - SAFETY				06 - MGMT. VISIT				10 - PLANT SEC.				14 - INQUIRY			
2 - REGIONAL OFFICE LETTER			03 - INCIDENT				07 - SPECIAL				11 - INVENT. VER.				15 - INVESTIGATION			
			04 - ENFORCEMENT				08 - VENDOR				12 - SHIPMENT/EXPORT							
			05 - MGMT. AUDIT				09 - MAT. ACCT.				13 - IMPORT							

INSPECTION/INVESTIGATION FINDINGS (Check one box only)					TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2,790 INFORMATION				LETTER OR REPORT TRANSMITTAL DATE					
A	B	C	D		A	B	C	D	A	B	C	D	A	B	C	D	NRC FORM 581 OR REG. LETTER ISSUED			REPORT SENT TO HQ FOR ACTION		
				1 - CLEAR													MO.	DAY	YR.	MO.	DAY	YR.
				2 - VIOLATION																		
				3 - DEVIATION																		
				4 - VIOLATION & DEVIATION																		

MODULE INFORMATION												MODULE INFORMATION																		
REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSPEC-TION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP					REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSPEC-TION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP					
TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL					PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE		NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL					PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL		
B	5	9	2	7	0	A	0.18					B				A														
						B										B														
						C										C														
						D										D														
B	5	9	2	7	0	A	0.47					B				A														
						B										B														
						C										C														
						D										D														

\* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION