

Docket No. 50-267/90-07
License No. DPR-34

Public Service Company of Colorado
ATTN: A. Clegg Crawford, Vice President
Nuclear Operations
P.O. Box 840
Denver, Colorado 80201-0840

Gentlemen:

Thank you for your letter of July 20, 1990, in response to our letter and Notice of Violation dated June 22, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

This acknowledgement of your response was delayed due to an administrative error. We apologize for any inconvenience you may have experienced.

Sincerely,

151


Samuel J. Collins, Director
Division of Reactor Projects

CC:
Public Service Company of Colorado
ATTN: D. W. Warembourg, Manager
Nuclear Engineering Division
P.O. Box 840
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ATTN: David Alberstein, Manager
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ATTN: Charles H. Fuller, Manager
Nuclear Production and Station
Manager
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SJCcollins
11/26/90

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ATTN: D. D. Hock, President and
Chief Executive Officer
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Denver, Colorado 80201-0840

Public Service Company of Colorado
ATTN: Commitment Control Program
Coordinator
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Kelley, Standfield & O'Donnell
ATTN: Mr. J. K. Tarpey
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Chairman
Board of County Commissioners
of Weld County, Colorado
Greeley, Colorado 80631

Regional Representative
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Environmental Protection Agency
1 Denver Place
999 18th Street, Suite 1300
Denver, Colorado 80202-2413

Department of Health
ATTN: Robert M. Quillen, Director
Radiation Control Division
4210 East 11th Avenue
Denver, Colorado 80220

Public Service Company of Colorado -3-

Colorado Public Utilities Commission
ATTN: Ralph Teague, P.E.
1580 Logan Street OL1
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bcc to DMB (IE01) w/licensee ltr.

bcc distrib. by RIV w/licensee ltr.:

R. D. Martin

DPP

DRSS-FRPS

MIS System

Pete Erickson, NRR Project Manager (MS: 10-D-21)

DRS

Resident Inspector

DRP/TSS

Lisa Shea, RM/ALF

RSTS Operator

RIV File



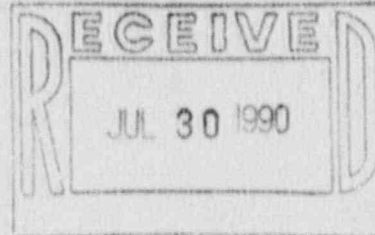
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A. Clegg Crawford
Vice President
Nuclear Operations

July 20, 1990
Fort St. Vrain
Unit No. 1
P-90234



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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Docket No. 50-267

SUBJECT: NRC INSPECTION REPORT 90-07

REFERENCE: NRC Letter, Collins to Crawford,
dated June 22, 1990 (G-90145)

Dear Sirs:

During the NRC inspection conducted by Mr. R. E. Farrell during the period of March 30, 1990, through May 31, 1990, a violation of NRC requirements was identified. The violation involved a failure to make a required four (4) hour nonemergency report within the allowable time, as described in the referenced letter.

The referenced transmittal letter also expressed concerns with regard to an apparent decline in sufficient planning and implementation of management controls. As you recall, in our meeting of April 16, 1990, we discussed precautionary actions that had been taken to minimize the potential for a decline in performance resulting from the permanent shutdown of Fort St. Vrain. We are continuing to assess our management actions concerning this very important subject and will provide a written response to you with our conclusions no later than July 31, 1990.

In accordance with 10CFR2.201, Public Service Company of Colorado hereby submits the following response to your Notice of Violation.

Failure to Make a Required 4-Hour Nonemergency Report Within the Allowable Time

10CFR50.72(b)(2)(vi) and the licensee's Procedure EP Class, Issue 7, "Event and Emergency Classification Overview," paragraph C14.12, require that the licensee notify the NRC as soon as practical and, in all cases, within four (4) hours of any event for which notification to other government agencies has been or will be made.

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Contrary to the above on April 19, 1990, commencing at 4:00 pm (MDT), the licensee made notifications regarding water chemistry to the National Response Center, EPA Region VIII, Colorado Department of Health, Hazardous Material and Waste Management Division, and Weld County Local Emergency Planning Committee. The licensee did not make the required notification to the NRC until 11:26 am (MDT) on April 20, 1990.

This is a Severity Level IV violation. (Supplement I.D.) (267/9007-01)

1. The Reason For The Violation If Admitted

The violation is admitted.

The violation occurred due to a lack of communication between site personnel and the Corporate department which is responsible for formal communication with other government agencies concerned with the initiating event.

Personnel in the Fort St. Vrain Water Chemistry Department monitored the unanticipated release of hydrazine from plant process streams. Water Chemistry Technicians were familiar with the limits associated with the facility Discharge Permit. This permit does not define hydrazine discharge limits. As site personnel became aware that the plant hydrazine discharge may be in violation of other Federal regulatory limits, the Corporate Environmental Services Department was contacted. Contact with the Environmental Services Department was made so that Corporate resources and expertise could be utilized to address and resolve the problem. Considerable discussion of the problem took place on April 19, 1990, and possible corrective actions were discussed. Plant personnel understood that further communication on the issue would occur with the site on April 20, 1990, so that an integrated corrective action plan could be developed. Late in the day of April 19, 1990, the Corporate offices concluded that a violation of environmental regulations had occurred, and notifications were initiated to the National Response Center, EPA Region VIII, Colorado Department of Health, Hazardous Material and Waste Management Division, and the Weld County Local Emergency Planning Committee. Corporate Environmental Services Department personnel were unaware of the parallel reporting requirements found in 10CFR50.72(b)(2)(vi).

2. The Corrective Steps Which Have Been Taken and The Results Achieved

During followup discussions with Corporate offices on the morning of April 20, 1990, site management became aware of the notifications that had been made the previous afternoon. Site management recognized the applicability of 10CFR50.72(b)(2)(vi), and immediately notified the NRC.

No additional instances of failure to make notification to the NRC when a report is made to another government agency have occurred since the incident on April 19, 1990.

3. The Corrective Steps Which Will Be Taken To Avoid Further Violations

The need to coordinate reporting activities with the NRC when making notifications to other government agencies was discussed and clarified with the Corporate Environmental Services Department, including the management responsible for such reporting.

Station administrative controls and procedures which address situations which may require reporting to government agencies other than the NRC have been reviewed. Station procedures contain adequate instruction for site personnel. Improvements made in the area of communications between the FSV site and the Corporate Environmental Services Department should preclude violations of this sort in the future.

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4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 20, 1990, when formal notification of the hydrazine release was made to the NRC.

If you have any questions or comments concerning this response, please contact Mr. M. H. Holmes at (303) 480-6960.

Sincerely,

A. Clegg Crawford

A. Clegg Crawford
Vice President,
Nuclear Operations
Fort St. Vrain Nuclear
Generating Station

ACC:DLW/bh

cc: Region Administrator, Region IV
Attn: Mr. J. B. Baird
Technical Assistant
Division of Reactor Projects

Mr. Robert Farrell
Senior Resident Inspector
Fort St. Vrain