

Docket No. 50-267/90-05  
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 May 25, 1990, in response to our letter and Notice of Violation dated April 27, 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,

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
Samuel J. Collins, Director  
Division of Reactor Projects

cc:  
Public Service Company of Colorado  
ATTN: D. W. Warembourg, Manager  
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GA International Services Corporation  
Fort St. Vrain Services  
ATTN: David Alberstein, Manager  
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San Diego, California 92138

Public Service Company of Colorado  
ATTN: Charles H. Fuller, Manager  
Nuclear Production and Station  
Manager  
16805 Weld County Road 19-1/2  
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RIV:C:DRP/TSS  
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SJC  
SJCollins  
11/26/90

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Public Service Company of Colorado -2-

Public Service Company of Colorado  
ATTN: H. L. Brey, Manager, Nuclear  
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Management Division  
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Public Service Company of Colorado  
ATTN: P. F. Tomlinson, Manager  
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Public Service Company of Colorado  
ATTN: D. D. Hock, President and  
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Denver, Colorado 80201-0840

Public Service Company of Colorado  
ATTN: Commitment Control Program  
Coordinator  
2420 W. 26th Ave. Suite 100-D  
Denver, Colorado 80211

Kelley, Standfield & O'Donnell  
ATTN: Mr. J. K. Tarpey  
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Chairman  
Board of County Commissioners  
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Regional Representative  
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Department of Health  
ATTN: Robert M. Quillen, Director  
Radiation Control Division  
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Public Service Company of Colorado -3-

Colorado Public Utilities Commission  
ATTN: Ralph Tague, P.E.  
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bcc to DMB (IE01) w/licensee ltr.

bcc distrib. by RIV w/licensee ltr.:

R. D. Martin

DRP

DRSS-FRPS

MIS System

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

DRS

Resident Inspector

DRP/TSS

Lisa Shea, RM/ALF

RSTS Operator

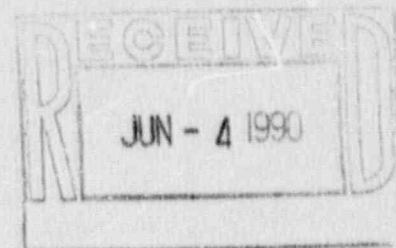
RIV File



Public Service\*

Public Service  
Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651



May 25, 1990  
Fort St. Vrain  
Unit No. 1  
P-90179

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

Docket No. 50-267

SUBJECT: NRC INSPECTION REPORT 90-05

REFERENCE: NRC Letter, Collins to Crawford, dated April 27, 1990  
(G-90098)

Dear Sir:

During NRC inspections conducted by Mr. R. E. Farrell during the period of February 7 through March 29, 1990, two violations of NRC requirements were identified. The violations involved a failure to follow procedures and use of an improperly reviewed procedure, as described in the Reference. In accordance with 10 CFR 2.201, Public Service Company of Colorado hereby submits the following response to your Notice of Violation.

A. Failure to Follow Procedures

10 CFR 50, Appendix E, Criterion V states, in part, "Activities affecting quality...shall be accomplished in accordance with...instructions, procedures, or drawings," and the licensee's approved quality assurance program requires that safety-related activities be performed in accordance with appropriate drawings, procedures, or instructions.

Contrary to the above, on February 7, 1990, an equipment operator was instructed by the test director to skip Step 5.4.27c of Surveillance Procedure SR 5.2.21-SA, Issue 23, "Semi Annual Surveillance on ACM Diesel," as the operator had experienced difficulty in performing this step and the rest of the test team had been allowed to proceed beyond that step already without confirmation that this step had been completed by all test participants as required by the procedure.

IC-90-163

~~90060318~~ (SP)

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This is a Severity Level IV violation. (Supplement I.D)  
(267/9005-01)

(1) The reason for the violation if admitted:

The violation is admitted. Improper radio protocol was used during the surveillance testing. The equipment operator did not verify his instructions, and the test director did not confirm an acknowledgement. This resulted in the test director's mistaken conclusion that Step 5.4.2/c was completed as he proceeded with the test. When it became apparent that step 5.4.27c had not been completed, the test director instructed the equipment operator to skip the step since it was not important for the performance of the test.

The test crew members had all participated in the performance of SR 5.2.21-SA several times in the past and were familiar with the test. Due to this familiarity, the test was being performed at a pace that contributed to missing a step.

(2) The corrective steps which have been taken and the results achieved:

The test was stopped, and the crew members met with the Superintendent of Operations (SOO) and the Nuclear Licensing Compliance Supervisor (NLCS). The surveillance completed up to that point was discussed in detail. The NLCS performed a compliance evaluation on the completed portion of the test, with emphasis on the missed step. The evaluation concluded that this missed step had no adverse impact on demonstrating operability of the P-4602S ACM transfer switch, but did pose a potential personnel safety hazard. The SOO emphasized management's commitment to both procedural adherence and personnel safety.

An Operations Order was issued that states, "When performing procedures that require the coordination of two or more people, the coordinator must receive and acknowledge confirmation that a step is completed prior to starting the next step unless the procedure allows concurrent activities."

A Training Development Request was initiated to develop a formal communication training module. The Training Department inserted an INPO good practice communication videotape into the curriculum of the Licensed Operator Requalification Program, and prepared a lesson plan (LR-098.01) for formal communication training. Communication training was formally started in Licensed Operator Requalification Program on April 23, 1990, with the non-licensed operators also scheduled to attend.

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(3) The corrective steps which will be taken to avoid further violations:

Management will continue to stress the requirement for procedural compliance on an on-going basis. Also, improved communications is a primary objective of our recently formulated Service Excellence Program in Nuclear Operations.

(4) The date when full compliance will be achieved:

LR-098.01 training is scheduled to be completed May 25, 1990.

B. Use of Improperly Reviewed Procedure

The licensee's Technical Specification (TS) AC 7.1.2.5.a requires that the Plant Operations Review Committee review all procedures required by TS 7.4(a) and changes thereto. The licensee's TS AC 7.4(a) requires written procedures for refueling operations.

Contrary to the above, on March 1, 1990, licensee personnel lifted a spent fuel shipping cask full of spent fuel from its truck bed using a procedure, "Station Service Request (SSR) 90500781," which had not been reviewed and approved by the Plant Operations Review Committee.

This is a Severity Level IV violation. (Supplement I.D)  
(267/9005-02)

(1) The reason for the violation if admitted:

The violation is admitted. On March 1, 1990, a spent fuel shipping cask was removed from its truck trailer to facilitate corrective maintenance on the trailer. This work was appropriately performed as a non-routine corrective maintenance activity governed by Controlled Work Instructions (CWI's) prepared in accordance with Station Manager Administrative Procedure 29 (SMAP-29). Spent fuel shipping casks have infrequently been handled in the manner used for this evolution. However, in such previous cases, the cask has not been loaded with spent fuel.

Activities performed with CWI's in accordance with SMAP-29 are not typically individually reviewed by the Plant Operations Review Committee (PORC), since the PORC has reviewed the SMAP-29 governing document. However, in this case, the nature of the activity warranted PORC review prior to implementation since the shipping cask was loaded with spent fuel. For this reason, Public Service Company admits to the violation.

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(2) The corrective steps which have been taken and the results achieved:

The CWI's were reviewed for adequacy by the PORC Chairman immediately following the event. The instructions were quite detailed and provided information appropriate to the circumstances.

Routine fuel handling activities are performed via Fuel Handling Procedure Work Packages (FHPWP's), which are individually reviewed by the PORC prior to implementation. FHPWP's are written in accordance with a master manual, the Fuel Handling Procedure Manual. This document was reviewed to determine if changes should be made to address corrective maintenance activities. It was determined that the FHP Manual was not the appropriate place to address corrective maintenance.

Corrective maintenance on equipment necessary for defueling will continue to be controlled in accordance with SMAP-29. This procedure provides for PORC review of CWI's, as applicable.

The Manager, Nuclear Production Division immediately instructed fuel deck management personnel that all non-routine CWI's involving the handling of spent fuel will be prepared in accordance with SMAP-29, and will be reviewed by the PORC prior to implementation. There have been no recurrences of this type of event since the date of this incident.

(3) The corrective steps which will be taken to avoid further violations:

The Manager, Nuclear Production has documented the requirements for review of CWI's involving the non-routine handling of spent fuel via memo PPC-90-1304, dated May 22, 1990. This memo has been distributed to all personnel and management performing fuel deck activities.

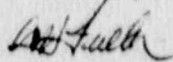
(4) The date when full compliance will be achieved:

Full compliance was achieved on March 1, 1990, with the instructions given by the Manager, Nuclear Production Division for the non-routine handling of spent fuel.

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

Sincerely,



C. H. Fuller  
Manager, Nuclear Production  
Fort St. Vrain Nuclear  
Generating Station

CHF/GMK:km

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

Mr. R. E. Farrell  
Senior Resident Inspector  
Fort St. Vrain