

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Report: 50-267/83-04

Docket: 50-267

License: DPR-34

Licensee: Public Service Company of Colorado (PSC)  
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: February 7-11, 1983

Inspector: *R. T. Redano* *2-25-83*  
R. T. Redano, Reactor Inspector  
Reactor Project Section A Date

Approved: *T. F. Westerman* *2-26-83*  
T. F. Westerman, Chief  
Reactor Project Section A Date

Inspection Summary

Inspection Conducted on February 7-11, 1983 (Report 50-267/83-04)

Areas Inspected: Routine, unannounced inspection of Quality Assurance (QA) program, audit implementation, and previously identified items. The inspection involved 34 inspector-hours by one NRC inspector.

Results: Within the area inspected, no violations or deviations were identified. Two open items, 8304-01 and 8304-02, were identified in the area of the QA program and one open item, 8304-03, was identified in the area of audit implementation.

Details1. Persons Contacted

- \*R. Craun, Supervisor of Nuclear Site Engineering
- \*D. Warembourg, Manager of Nuclear Production
- \*E. Hill, Station Manager
- \*J. Gahm, Manager of QA
- M. Ferris, QA Engineer
- G. Redmond, MQC Supervisor
- J. Jackson, QA/QC Supervisor
- T. Orlin, Superintendent of QA Services
- P. Moore, Supervisor of QA Technical Support
- \*L. Singleton, Superintendent of QA Operation
- \*W. Craine, Superintendent of Maintenance
- D. Edmiston, QA Engineer

\*Denotes presence at exit interview conducted on February 11, 1983.

2. Status of Previously Identified Items

Violation 8219-01: This violation was issued for failure to produce documentation of functional testing of the safety-related design change performed in CN 653. In a November 29, 1982, letter of response to this violation, licensee stated, "CN 653 was completed October 8, 1981, and functionally tested via SR5.4.9-A2 (copy attached), on October 21, 1981." The attached copy of SR5.4.9-A2 referenced in the above letter was reviewed by the Plant Operations Review Committee (PORC) on September 8, 1981, and its effective date was September 11, 1981. The NRC inspector obtained a copy of the SR5.4.9-A2 procedure actually used to perform the functional test. This procedure was PORC reviewed on December 10, 1980, and permission to initiate test was granted by the shift supervisor on October 3, 1981. Upon discovering that the licensee failed to use the most current procedure revision in conducting SR5.4.9-A2 to functionally test CN 653, the NRC inspector compared the two procedure revisions to evaluate their technical differences. From this comparison, the NRC inspector learned that the two procedure revisions were technically identical and only administrative changes had been made in the later revision level. The procedure revision used to functionally test CN 653 was technically acceptable. The unacceptability of using out-of-date procedure revisions has been documented in violation 8206-02. This item is closed.

Open Item 8302-01: The NRC inspector reviewed Inter Department Memo PPC-83-0101, dated January 17, 1983, and entitled, "Delegation of Authority." This memo adequately specifies the PORC designated alternate policy. This item is closed.

### 3. Quality Assurance Program

The NRC inspector examined the QA implementing procedures contained in the Administrative Procedures Manual to determine whether they adequately implement the QA program described in the licensee's updated Final Safety Analysis Report (FSAR) and sought to determine whether the licensee's QA program is adequate in depth and scope to meet the intent of 10 CFR 50 Appendix B.

In reviewing FSAR Section B.5.19.7(a) on "Scope and Applicability" of "ANSI N45.2.6-1973 Qualification of Inspection, Examination, and Testing Personnel," the NRC inspector noted the following statement: "Personnel performing inspections, examinations and testing activities during the operational phase would be qualified to ANSI N18.1-1971 or ANSI N45.2.6-1973 except that QA experience for levels I, II, and III should be interpreted to mean actual experience in operation or maintenance of the area involved."

The terminology "actual experience," used above, is somewhat more restrictive than that used in ANSI N45.2.6-1973. In a February 3, 1982, letter to D. G. Eisenhut, Division of Licensing, Office of Nuclear Reactor Regulation, NRC, in response to Generic Letter 81-01, the licensee committed to adhere to ANSI N45.2.6-1973. In an April 5, 1982, letter responding to the licensee's February 3, 1982, letter, the NRC found the licensee's commitments to be acceptable. The licensee appears to be meeting its commitment to adhere to ANSI N45.2.6-1973. This will remain an open item, 8304-01, pending revision of Section B.5.19.7(a) of the FSAR to reflect the licensee's actual commitments in the area of QA/QC personnel qualifications.

The inspection and audit functions of the licensee's QA program are accomplished by the performance of monitoring activities and audits. A potential problem area in the licensee's QA program is the performance and tracking of monitoring activities. These activities are contained in the Quality Assurance Monitoring Manual (QAMM) and are designated by a QAMM number. The NRC inspector examined the scope of individual QAMM's and associated Quality Assurance Audits (QAA) and Nuclear Facility Safety Committee (NFSC) audits and gave the licensee credit for performing a QAMM whenever a QAA or NFSC audit had been performed on that subject area in the same year. Based upon this comparative evaluation, the NRC inspector determined that QAMM P3-3, "Gas/Liquid Waste Releases," had never been performed and QAMM P1-10, "Temporary Configuration," had not been performed in over 2 years. The licensee had not specified a frequency requirement in any administrative procedures for the performance of QAMM's; however, the NRC inspector discovered Inter Department Memo QAC-81-0391 from the superintendent of QA operations, dated July 10, 1981, which stated, "The monitoring activity should be scheduled on a biennial basis for the years other than those for which the audit is performed." This memo appears to manifest the licensee's intent to perform QAMM's on a biennial frequency in years when the area of interest has not been audited by a QAA or NFSC audit.

The licensee informed the NRC inspector that the QAMM program was being reevaluated and revised to improve its integration in the total QA program and to render the task of scheduling, performing, and tracking QAMM's more manageable. The NRC inspector reviewed documentation pertaining to the licensee's revision of the QAMM program and concurred with the licensee that the present set of QAMM's is too voluminous to yield the intended practical benefit. This will remain an open item (8304-02) until the QAMM program is revised to provide manageable and specific criteria for the performance and tracking of QAMM's.

Two recently identified items from NRC Inspection Report 50-267/83-01 point to weaknesses in the licensee's QA program. These are open item 8301-01 dealing with procurement and unresolved item 8301-03 dealing with the control of reserve shutdown system balls. It appears that the licensee's QA program will adequately meet the scope of 10 CFR 50 Appendix B upon successful resolution of the aforementioned open and unresolved items.

No violations or deviations were identified in this area of inspection.

#### 4. Audit Implementation

The NRC inspector sought to determine whether audit and inspection personnel were properly qualified, audits were performed in required frequency, audit content was thorough and well defined, and identified deficiencies were promptly addressed and resolved. The qualifications of selected QA personnel reviewed by the NRC inspector met the licensee's commitment. The "QA Personnel Summaries" of certain maintenance quality control, MQC, personnel contained incomplete educational data. The affected MQC individuals were qualified to their present inspection level solely on their work experience. This will remain an open item (8304-03) pending update of the MQC personnel files to include educational data.

The NRC inspector reviewed the schedule of all QAA's performed in 1981 and 1982. From this review, it appears that the licensee is meeting its procedural requirement to perform each audit every 2 years. The technical content and scope of the audits listed below were evaluated by the NRC inspector.

<u>Audit Number</u>	<u>Title</u>
301-82-01	Reactor Plant Operations
401-81-01	Core Management
601-81-01	Water Chemistry and Radiochemistry
602-81-02	Health Physics
701-82-01	Surveillance Testing
1101-82-01	Calibration
1501-81-01	Radioactive Waste

These audits were specific in scope, adequately thorough and conducted by qualified personnel.

Identified deficiencies from each audit are documented with a corrective action request. The licensee tracks the status of corrective action requests by using a computer printout. The vice president of electrical production is sent a monthly list of corrective action requests for which no response has been received or for which timely resolution has not been achieved. This tracking and notification system appears to effectively achieve response and resolution of identified deficiencies.

The NRC inspector learned that the licensee is developing a quality trend evaluation program which will utilize the corrective action request tracking system data base to identify general trends adverse to quality.

The licensee's audit implementation complied with all applicable procedural and regulatory requirements.

No violations or deviations were identified in this area of inspection.

#### 5. Exit Interview

An exit interview was conducted on February 11, 1983, with those persons denoted in paragraph 1 of this report. At the interview, the NRC inspectors discussed the findings indicated in the previous paragraphs. The licensee acknowledged these findings. The resident inspectors also attended the exit interview.

**INSPECTOR'S REPORT**  
Office of Inspection and Enforcement

*Kedano, Richard T*  
REVIEWER  
*Westerman, Tom F*

INSPECTORS  
*Kedano, R. T.*

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT NO.		NEW REPORT DATE	
			NO.	ST.	MO.	YR.
<i>Public Service Company of Colorado</i>	<input checked="" type="checkbox"/> I - INSERT <input type="checkbox"/> M - MODIFY <input type="checkbox"/> D - DELETE <input type="checkbox"/> R - REPLACE	<i>05000267</i>	<i>8304</i>			
	1	2	14	15	16	

PERIOD OF INVESTIGATION/INSPECTION							INSPECTION PERFORMED BY		ORGANIZATION, CODE OR REGIONAL OFFICE (See Activity Code Manual Reporting - Weekly Mandatory Reporting Schedule)				
FROM			TO				1 - REGIONAL OFFICE STAFF	2 - RESIDENT INSPECTOR	3 - PERFORMANCE APPRAISAL TEAM	OTHER	4	C	A
MO.	DAY	YR.	MO.	DAY	YR.								
<i>02</i>	<i>07</i>	<i>83</i>	<i>02</i>	<i>11</i>	<i>83</i>								
20	25	26	31			32				33	34	35	

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

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2790 INFORMATION				LETTER OF REPRODUCTION DATE			
A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D
<input checked="" type="checkbox"/>																			
1 - CLEAR				1 - YES				1 - YES				MAR 1 1983							
2 - VIOLATION				2 - YES				2 - YES											
3 - DEVIATION				3 - YES				3 - YES											
4 - VIOLATION & DEVIATION				4 - YES				4 - YES											

MODULE INFORMATION												MODULE INFORMATION												
REC. ORD.	MODULE NUMBER INSP.				PRIORITY	DIRECT INSPEC. REPORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	MODULE REQ. FOLLOWUP				REC. ORD.	MODULE NUMBER INSP.				PRIORITY	DIRECT INSPEC. REPORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	
TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER						LEVEL	SECT.	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE						MANUAL CHAPTER
B	5307038				A	0.1						B					A							
B	5407041				A	0.6	100%					B					A							
B	5357011				A	0.6	100%					B					A							
B	5927063				A	0.9						B					A							

\* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION