

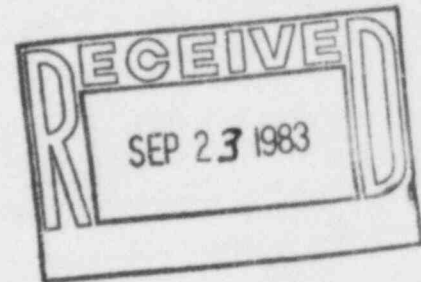


Public Service Company of Colorado
2420 W. 26th Avenue, Suite 100D Denver, Colorado 80211

50-267

September 19, 1983
Fort St. Vrain
Unit No. 1
P-83312

Mr. G. L. Madsen, Chief
Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



SUBJECT: Control Room Doors

- REFERENCE: 1) U.S. NRC Letter dtd. 08/19/83;
Madsen to Lee (G-83312)
2) PSC Letter dtd. 11/13/78;
Fuller to Gammill (P-78182)
3) USNRC Letter dtd. 10/28/77;
Denise to Fuller (G-77076)

Gentlemen:

This letter is in response to the Notice of Violation received as a result of an inspection conducted at Fort St. Vrain during the period August 1-5, 1983. The restatement of the violation and the response to the items contained in the Notice of Violation is hereby submitted.

1. 10 CFR Part 50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions, procedures or drawings ..."

Fort St. Vrain Administrative Procedure Q3, "Design Control System," Issue 5, dated June 13, 1983, states in paragraph 4.1.3; "Design engineers determine for each modification if any portion is safety related; and, identify the applicable design input requirements, including regulatory requirements, codes, standards and specifications."

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The FSAR, in Tables 1.4-1, and 1.4-2, identifies the "control room ... including external access ...," As "Class I" and Safe Shutdown."

Contrary to the above, Change Notice 1377, dated August 24, 1981, failed to classify door 66 as "Class I" and "Safe Shutdown." Door 66 is the external access door to the control room.

This is a Severity Level IV Violation. (Supplement ID) (50-267/8321-01)

PSC Response

PSC agrees that it failed to identify CN-1377 dated August 24, 1981 as Class I Safe Shutdown. However, this classification is applicable only to the door frames and surrounding concrete. PSC's interpretation of Class I, Safe Shutdown "control room ... including external access" is that the structural integrity of the door frames and surrounding concrete must be maintained and is sufficient to assure "external access."

PSC will reissue CN-1377 and provide the necessary documentation to qualify the frame for door #66 as Class I, Safe Shutdown. To avoid reoccurrence of this violation in the future, all personnel involved will be instructed that the classification of the control room external access is Class I, Safe Shutdown. PSC will be in compliance by December 1, 1983.

PSC believes this item to be closed. No further action required.

A second item in your letter (Ref. 1) requested PSC to address open unresolved item (50-567/8302-03).

NRC Comment

(Open) Unresolved Item (50-267/8302-03): This item was unresolved pending licensee review and documentation to resolve concerns about all three access doors to the control room. The concerns were the fire rating, door condition, acceptability of a derated fire wall condition, and acceptability of a "Bullet Proof" label on a UL rated fire door.

A licensee representative informed the NRC inspector that this item had been carried under the licensee's corrective action request program as CAAR 597. Review of the status of this CAAR determined that it had been responded to on March 30, 1983, and closed on May 10, 1983.

The NRC inspector reviewed the response to CAAR 597 and found it to be incomplete. The response does not address all three doors. It does not address the present door condition, i.e., the door holes.

Documentation to support the derating of two of the doors from 3-hour to 1-1/2 hour fire rating was not available. Documentation for the earlier modification that installed a 10" x 10" bullet proof glass vision panel was not available.

PSC Response

PSC engineering reviewed the condition of the three control room doors. The holes were evaluated and we corrected the condition by installing properly sized sheet metal screws to fill the holes. The corrective action was reviewed and approved by the original manufacturer.

The documentation to support the derating of two of the doors from 3 hours to 1-1/2 hours is contained in PSC's response to BTP 9.5.1, Section 4.2.3 (Ref. 2). This section of BTP 9.5.1 states that the combustible materials near the control room door are negligible.

The 1983 NFPA-80 code para. 1-7.3 permits the use of up to 100 square inches of wire glass in a 1-1/2 hour fire rated door.

Documentation for the earlier modification that installed the 10" x 10" bullet proof glass vision panel is available in record storage as change notice, FCN-SL-590.

NRC Comment

The response to CAAR 597 referenced a recent Change Notice (CN) No. 1377, that replaced door 66, one of the control room access doors, with a new unit. A review of Change Notice No. 1377 revealed that the new door was purchased under Purchase Order 3526 which stipulated that the "door will be constructed according to 'UL' standards for 3-hour fire resistance with NO 'UL' fire label applied." This door was bought as bullet resistive with a 10" x 10" glass, bullet proof, vision panel. There was no rationale for stipulating no 'UL' fire label be applied.

PSC Response

As stated, the door was purchased under P.O. 3526 stipulating a 3 hour fire rating. The P.O. also stated that a 10" x 10" vision panel be installed. When the door is modified by cutting a hole and installing the vision panel a derating of the door is required. The glass vision panel requires the door be rated at only 1-1/2 hours. Therefore, PSC did not want the door to be labeled with an incorrect UL label. Reference 3 stated that NRC accepted this feature, provided the area in front of the door is maintained clear of combustibles.

NRC Comment

By procedure, the licensee requires a safety evaluation for any design change. The safety evaluation form included in CN No. 1377 specifically identified the control room access door as not Class 1, not safe shutdown, and not safety-related. However, the FSAR in Table 1.4-1, "List of Class I structures, systems, and components" and Table 1.4-2, "List of structures, systems, and components required for a safe shutdown of the plant," lists as item 16 in both tables, "control room and control equipment associated with the above items, including external access and control room emergency ventilation." Failure to properly classify this structure as "Class I" and "Safe Shutdown" is an apparent violation. (50-267/8321-01)

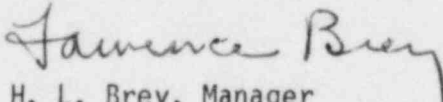
PSC Response

This portion of the inspection report was previously answered on page 2 of this letter.

PSC believes that open item 8302-3 is closed. No further action required.

This completes the PSC action items required by Ref. 1. If you have any further questions, please contact Mr. J.R. Reesy (303) 571-8406.

Very truly yours,


H. L. Brey, Manager
Nuclear Engineering Division

HLB/JRR:pa