

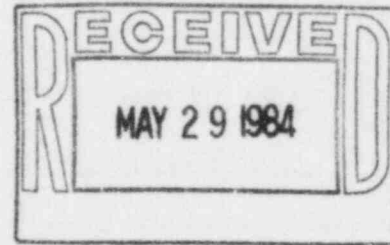


**Public Service Company of Colorado**

16805 WCR 19 1/2, Platteville, Colorado 80651

50-267

May 21, 1984  
Fort St. Vrain  
Unit No. 1  
P-84154



Mr. E. H. Johnson, Chief  
Reactor Project Branch 1, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive  
Arlington, TX 76011

SUBJECT: I & E Inspection Report 84-01

REFERENCE: NRC Letter dated April 25, 1984

Dear Mr. Collins:

This letter is in response to the Notices of Violation received as a result of inspections conducted at Fort St. Vrain during the period January 1 through February 29, 1984. The following response to the items contained in the Notices of Violation is hereby submitted:

Failures to Follow Approved Quality Assurance Program Procedures

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . ."

The licensee's Final Safety Analysis Report, Section B.5.2, "Quality Assurance Programs," states,

"B.5.2.2 Program Procedures

Procedures fully describing the Quality Assurance Program are maintained in the FSV Administrative Procedures Manual. The "Q"-series procedures serve as the Quality Assurance Manual and conform to the requirements of 10CFR50, Appendix B, by providing an individual procedure to describe the FSV program for each of the 18 Criteria. Compliance with the FSV Administrative Procedures

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Manual is mandatory for all personnel assigned to nuclear project activities affecting quality of safety-related items. Detailed procedures are provided, where required, by procedures subordinate to the FSV Administrative Procedures Manual (see Subsection B5.2.10)."

1. Administrative Procedure Q-7, "Control of Procured Materials and Services," Issue 5, dated September 13, 1983, states, in part,

"4.6 QA/QC RECEIVING INSPECTION

"A general receiving inspection is performed by QA/QC utilizing a copy of the P.O. and appropriate procedures or checklists, when required to verify that P.O. requirements have been satisfied . . . All inspections are documented on the RIR."

Contrary to the above, on January 26, 1984, the NRC inspector determined that the required receipt inspection had not been performed for safety-related switchgear purchased for electrical system modifications to be made during the third refueling outage.

This is a Severity Level IV Violation. (Supplement I.D.)  
(50-267/8401-01)

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

A receiving inspection was performed on the purchase orders in question (N5168, N3902, and N5218) resulting in the issuance of three emergency disbursement nonconformance reports (NCR) for lack of required documentation. The required documentation was subsequently received and the purchase orders and nonconformance reports were closed.

- (2) Corrective steps which will be taken to avoid further violations:

Memo PPC-84-0236 was issued on January 30, 1984 by management, addressing interim controls by FSV security department to ensure that material brought on site does not bypass the receiving warehouse and the quality assurance department receiving inspections.

A Procurement Committee has been established to review receiving practices. The interim controls set forth in PPC-84-0236 are to remain in effect, pending incorporation of the Procurement Committee recommendations, thereby providing positive control of material entering the plant site. This action should preclude repetition and violations of this type.

- (3) The date when full compliance will be achieved:

Full compliance was achieved on January 30, 1984.

2. Administrative Procedure Q-7, "Control of Procured Materials and Services," Issue 5, dated September 13, 1983, states, in part,

"4.6.3 For Non-conforming items, the Inspector:"

\* \* \*

"b) Initiates an NCR per Procedure Q-15"

\* \* \*

"4.6.6 On release of acceptable items, the Inspector accumulates the QA P.O. record file as described in the Material Receipt Inspection Manual and forwards it to the Records Center for retention."

Administrative Procedure Q-15, "Control of Nonconforming Items," Issue 3, dated June 23, 1982, states,

"4.1 Documenting nonconforming items

"QA/QC/MQC assigned to the department or area in which a nonconforming hardware item is identified, is responsible for initiation of a Nonconformance Report (NCR) (Attachment Q-15A)."

Material Receipt Inspection Manual MRIM-1, "General Receiving Inspection," Issue 3, dated November 21, 1983 states,

"4.4 Transmittal of Completed P. O.'s

"When a purchase order has been signed "Cleared", the QA/QC Inspector shall complete Part III of the "Review of Quality Related Purchase Orders" form and attach it to the completed Purchase Order along with all Pertinent documents. He shall then transmit the package to the Record Center for retention in accordance with Procedure Q-17."

Contrary to the above, on January 26, 1984, the NRC inspector determined that the QA/QC inspector had failed to document nonconforming reserve shutdown material purchased under Purchase Order (PO) N3554, and had failed to accumulate the QA PO record file for the purchase as required to include all pertinent documents.

This is a Severity Level IV Violation. (Supplement I.D.)  
(50-267/8401-04)

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

Upon notification of the deficiency, nonconformance reports (NCR's) 84-24 and 84-34 were initiated identifying the material nonconformances and incomplete documentation. All reserve shutdown material associated with the PO in question (N3554) was put on hold. This included material that had been released and put in unused reserve shutdown system hoppers. The NCR's were processed and the Nuclear Engineering Division (NED) provided technical bases for use of the material "as is", as well as a complete documentation review to correct documentation discrepancies identified in the Resident NRC Inspector's Notification Report dated 1-26-84. The technical bases for material acceptability is documented in NED Memo NDS-84-0143 and instructions for correcting the Purchase Order documentation discrepancies are contained in NCR 84-34. The corrective action required by the NRC dispositions has been accomplished. The material is acceptable and the final documentation is corrected.

- (2) Corrective steps which will be taken to avoid further violations:

The receiving inspector involved in the above activities has been replaced. The new receiving inspector has been instructed on the importance of controlling nonconforming material through the use of tags and segregation. The inspector also received additional instruction in what constitutes a completed Purchase Order file prior to attaching the Part III of the "Review of Quality Related Purchase Orders" form and transmitting the Purchase Order to the FSV Records Center for permanent storage.

- (3) The date when full compliance will be achieved:

Date of full compliance was achieved on March 7, 1984.

3. Administrative Procedure Q-10, "Inspection," dated June 1, 1980, states,

"4.3.3 PTR's and new/revised maintenance procedures except those for welding are reviewed by MQC to identify and specify required inspections and to assure provisions for documentation of inspection results."

Technical/Administrative Service Managers Administrative Procedure TASMAP-2, "Maintenance Quality Control Program," Issue 6, dated July 18, 1983, states,

"4.2 MAINTENANCE AND PREVENTATIVE MAINTENANCE  
PROCEDURE REVISION

Maintenance QC shall review all maintenance and preventive maintenance procedure revisions to assure the validity of existing QC Sign Offs and to add QC Sign Offs as necessary."

Contrary to the above, on January 13, 1984, the NRC inspector determined that MQC had not reviewed all new/revised maintenance procedures as required.

This is a Severity Level V Violation. (Supplement I.E.)  
(50-267/8401-05)

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

Effective January 11, 1984, proposed new or revised maintenance procedures are routed to the Maintenance Quality Control Department for incorporation of Hold and/or Witness Points as required. The term "maintenance procedure" has been defined to include corrective or preventive maintenance procedures used by the Results (I&C), Mechanical Maintenance, and Electrical Maintenance Departments.

An independent review of new and revised maintenance procedures to ensure that required Maintenance QC reviews are incorporated is performed by the Technical Services Department. The Technical Services departmental procedure has been revised to include this requirement for independent review.

New procedure revision processing requirements have been discussed with affected departmental supervisors and managers.

- (2) Corrective steps which will be taken to avoid further violations:

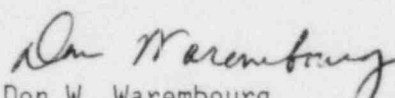
No future actions are required to avoid further violations.

- (3) The date when full compliance will be achieved:

The program to correct the violation deficiency was placed in effect on January 11, 1984.

Should you have any further questions, please contact Mr. L. Milton McBride, (303) 571-7436, ext. 201.

Very truly yours,

  
Don W. Warembourg  
Manager, Nuclear Production  
Fort St. Vrain Nuclear  
Generating Station

DWW/djc