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February 5, 1992
Fort St. Vrain
Unit No. 1
P-92047

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

Docket No. 50-267

SUBJECT: Licensee Event Report 92-001-00, Final Report

REFERENCE: Facility Operating License No. DPR-34

Gentlemen:

Enclosed, please find a copy of Licensee Event Report No. 50-267/92-001-00, Final, submitted per the requirements of 10 CFR 50.73(a)(2)(i)(B).

If you have any questions, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,

D. W. Warembourg
D. W. Warembourg
Manager, Nuclear Operations
Fort St. Vrain Nuclear
Generating Station

DWW/JFH/lmg

Enclosure

cc: Regional Administrator, Region IV

Mr. J. B. Baird
Senior Resident Inspector
Fort St. Vrain

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Port St. Vrain, Unit No. 1 DOCKET NUMBER (2) 051010121617 PAGE 3
1 OF 014

TITLE (4) ACM ACTIVITY MONITORS NOT TESTED IN ACCORDANCE WITH TECHNICAL SPECIFICATIONS

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MONTH	DAY	YEAR	YEAR	SEQUENT. NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER (3)		
01	06	92	92	001	00	02	05	92	N/A	0510101		
										0510101		

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 1.264 AND 1.265 OF THE FOLLOWING (11):

OPERATING MODE (9) N	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 01010	20.406(k)(1)(iii)	50.36(a)(1)	50.73(a)(2)(v)	73.71(c)
	20.406(k)(1)(iii)	50.36(a)(2)	50.73(a)(2)(vi)	OTHER (See 7c in Appendix B of 10 CFR 1.264 and 1.265 of 10 CFR 1.264)
	20.406(k)(1)(iii)	X 50.73(a)(2)(iii)	50.73(a)(2)(vii)(B)	
	20.406(k)(1)(iii)	50.73(a)(2)(iii)	50.73(a)(2)(viii)(B)	
	20.406(k)(1)(iv)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12):
 NAME: M. H. Holmes, Manager, Nuclear Licensing
 TELEPHONE NUMBER: AREA CODE 31013, NUMBER 612101-1171011

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13):

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS
				N					

SUPPLEMENTAL REPORT EXPECTED (14):
 YES (If yes, complete EXPECTED SUBMISSION DATE) NO
 EXPECTED SUBMISSION DATE (5): MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces. i.e., approximately fifteen single-spaced typewritten lines) (15):

On January 6, 1992, during a routine review of Technical Specification (TS) procedure ESR-8.1.1a-Q "Radioactive Gaseous Effluent System Functional Test" it was discovered that the Alternate Cooling Method (ACM) exhaust stack activity monitors RT-4801, RT-4802, and RT-4803 were not included in the test procedure. RT-4801, RT-4802, and RT-4803 are part of a system of redundant activity monitors that sample and monitor the gaseous effluent discharged out the reactor building exhaust stack. TS section ESR-8.1.1 requires that the exhaust stack monitors be functionally tested quarterly. Failure to functionally test the ACM exhaust stack activity monitors constitutes a violation of TS requirements.

TS Amendment No. 71 received August 21, 1989, allowed use of RT-4801, RT-4802, and RT-4803 for fulfilling the TS requirements to monitor the reactor building exhaust effluent for particulates, halogens, and noble gases. Following receipt of TS Amendment No. 71, PSC took action to perform the various document updates required to fully implement the amendment. However, due to an apparent oversight the three ACM exhaust stack activity monitors were not added to the quarterly functional test procedure, ESR-8.1.1a-Q.

TS procedure ESR-8.1.1a-Q has been revised to include the three ACM exhaust stack activity monitors. The newly revised procedure was performed on January 30, 1992, and all three ACM activity monitors were found to function as designed during the test.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		9 2	0 0 1	0 0	0 2	OF	0 4

TEXT IF MORE SPACE IS REQUIRED, USE ADDITIONAL NRC FORM 366A (11/77)

EVENT DESCRIPTION:

On January 6, 1992, during a routine review of TS (Technical Specification) procedure ESR-8.1.1a-Q "Radioactive Gaseous Effluent System Functional Test" it was discovered that the Alternate Cooling Method (ACM) activity monitors RT-4801, RT-4802, and RT-4803 were not included in the test procedure. RT-4801, RT-4802, and RT-4803 function as backup activity monitors for sampling and monitoring the gaseous effluent discharged out the reactor building exhaust stack. These backup monitors are designated ACM monitors because they can be supplied with power from the ACM diesel generator in the event that all other AC power is lost. The three ACM stack monitors were supposed to be added to surveillance procedure ESR-8.1.1a-Q following receipt of TS Amendment No.71. This TS amendment, received August 21, 1989, allowed use of RT-4801, RT-4802, and RT-4803 for fulfilling the TS requirements for monitoring the reactor building gaseous effluent for particulates, halogens, and noble gases respectively.

Prior to receipt of Amendment No.71 the ACM activity monitors could not be utilized for fulfilling TS ELCO-8.1.1 gaseous effluent monitoring requirements because they have only local alarm capabilities. TS ELCO-8.1.1 required control room alarm capabilities for all exhaust stack monitors. TS Amendment No. 71 added provisions allowing use of alternate stack activity monitors with only local alarm capabilities (i.e., the ACM monitors).

Following receipt of TS Amendment No.71, PSC took action to perform the various document updates required to fully implement the TS amendment. However, due to an apparent oversight the three ACM exhaust stack activity monitors RT-4801, RT-4802, and RT-4803 were not added to the quarterly functional test procedure, ESR-8.1.1a-Q.

SAFETY EVALUATION:

Gaseous effluents discharged out the reactor building exhaust stack are monitored by redundant noble gas, particulate, and halogen monitors. TS ELCO-8.1.1 requires only one monitor of each type be operable during gaseous waste releases from the plant gas waste holdup system. The gaseous waste contained in the gas waste holdup system is sampled and analyzed prior to its release out the building exhaust stack.

Exhaust stack activity monitors RT-7324-1, RT-73437-1, and RT-73437-2 function as the primary noble gas, halogen, and particulate exhaust stack monitors respectively. RT-4801, RT-4802, and RT-4803 function as backups to the primary stack monitors and are relied upon only when one or more of the primary stack monitors is inoperable or unavailable. The alarm setpoints of all the exhaust stack activity monitors are determined in accordance with the Offsite Dose Calculation Manual (ODCM) to ensure compliance with 10 CFR 20 and 10 CFR 50 limits.

During the time period from August 21, 1989 to the present, approximately 170 gaseous waste releases were performed at Fort St. Vrain. One or more of the ACM activity monitors were relied upon to fulfill TS ELCO-8.1.1 monitoring requirements for approximately 10 of these 170 gas waste releases. During gas waste releases that an ACM activity monitor was relied upon, the local alarm was checked at least every four hours as required in ELCO-8.1.1 g(1).

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TEXT (if more space is required, use additional NRC Form 2664's) (17)

It is important to note that although the ACM activity monitors were not functionally tested quarterly the monitors were channel checked daily, source checked monthly, and calibrated every eighteen months as required by TS ESR-8.1.1. These surveillance activities, although absent the quarterly functional test, provided reasonable assurance that the ACM activity monitors were capable of alarming at the monitor setpoint as determined in the ODCM.

Functionally testing the ACM activity monitors consists of inputting a signal into the channel to verify channel response and verifying proper operation of the monitor alarm on high counts, circuit failure, and downscale failure. The eighteen month calibration procedure verifies proper alarm annunciation on increased monitor counts above the setpoint, however this surveillance does not verify alarm annunciation on circuit failure or downscale indication failure. The ACM activity monitors' circuit failure and downscale indication failure alarm functions were demonstrated to be operable on January 30, 1992.

Based on this analysis, PSC feels confident that the failure to perform the quarterly functional test on activity monitors RT-4801, RT-4802, and RT-4803 did not affect the reliability of the monitors. The surveillance activities that were performed on the ACM monitors provided reasonable assurance that the monitors remained capable of alarming on high activity and that adequate activity monitoring of the reactor building exhaust effluent was maintained to ensure 10 CFR 20 and 10 CFR 50 limits were not exceeded.

CAUSE:

In accordance with Nuclear Licensing Procedure NLR-3 a copy of Amendment No. 71 was provided to all affected plant departments so that appropriate procedure updates could be initiated. Due to an apparent oversight however, the quarterly functional test procedure, ESR-8.1.1a-Q, was not updated to include the three ACM activity monitors.

PSC considers the existing plant procedures and process for implementing TS amendments to be acceptable. The failure to include the ACM activity monitors in the quarterly functional test procedure is considered to be an isolated incident. No programmatic problems or generic deficiencies have been identified nor are any believed to exist.

CORRECTIVE ACTION:


TS surveillance procedure ESR-8.1.1a-Q "Radioactive Gaseous Effluent System Functional Test" has been revised to include the three ACM exhaust stack activity monitors RT-4801, RT-4802, and RT-4803.

The newly revised issue of ESR-8.1.1a-Q was successfully performed on January 30, 1992. During this test, all three ACM activity monitors were found to function as designed.

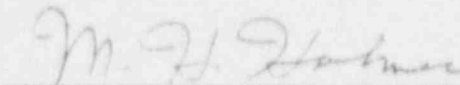
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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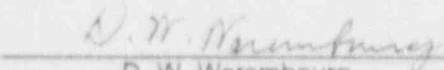
TEXT (If more space is required, use additional NRC Form 305A's.)



 J. F. Hill
 Nuclear Licensing Engineer



 M. H. Holmes
 Manager, Nuclear Licensing



 D. W. Warembourg
 Manager, Nuclear Operations
 and Station Manager