



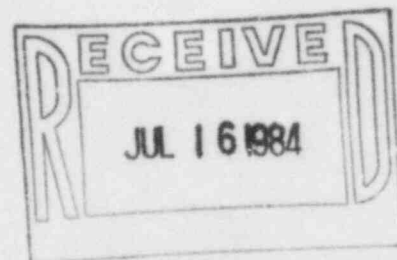
# Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

July 12, 1984  
Fort St. Vrain  
Unit No. 1  
P-84210

50-267

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 84-12

REFERENCE: NRC Letter dated June 14, 1984

Dear Mr. Johnson:

This letter is in response to the Notice of Violation and Notice of Deviation received as a result of inspections conducted at Fort St. Vrain during the period April 30 - May 4, 1984. The following response to the items contained in the Notice of Violation and Notice of Deviation are hereby submitted:

## NOTICE OF VIOLATION

### A. FAILURE TO FOLLOW TECHNICAL SPECIFICATION REQUIREMENT

Fort St. Vrain Technical Specification LCO 4.10.4, "Fire Barrier Penetration Seals, Limiting Condition for Operation," states, "All fire barrier penetration seals shall remain intact. If a fire barrier penetration seal is disturbed, a continuous fire watch shall be posted on either side of the disturbed seal."

The basis for Specification LCO 4.10.4, states, ". . . If the material of a fire barrier must be disturbed for maintenance, establishing a fire watch on either side of the barrier assures early notification of a potential fire hazard."

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The licensee's fire hazards analysis submitted to the NRC by letter P-78182, dated November 13, 1978, identifies the reactor building and turbine building as separate fire areas and further defines the common wall separating the two areas as a "fire area boundary."

Contrary to the above, a cable penetration through the fire barrier separating the reactor building from the turbine building at elevation 4791'-0" above door No. 7 was found, on May 2, 1984, unsealed with no fire watch posted.

This is a Severity Level IV Violation. (Supplement ID) (50-267/8412-10)

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

The licensee does not believe the Notice of Violation as stated above is warranted. The penetration referred to in the Notice of Violation is not a cable penetration. It is a piping penetration containing a hose that is used to drain condensation from the Reactor Building auxiliary air handling recirculation units to the Turbine Building sump. This type of penetration is classified as a piping penetration and is sealed for air tightness only to aid in maintaining the Reactor Building at a negative pressure. All piping penetrations in the Reactor Building walls are sealed for air tightness with standard pipe boots. As is stated in Section 4.1, page 4-7, fourth paragraph of the fire hazards analysis: "Penetrations in the wall (fire boundary) separating the Reactor Building and the Turbine Building are sealed for air tightness except electrical cable penetrations into the Auxiliary Electrical Equipment Room and 480 V Switchgear Room, which are sealed with 3-hour fire rated fire stops." The small penetration for the drain hose did not pose any Reactor Building atmospheric control problems and was therefore not sealed when it was originally installed.

The "J" wall west of the Three Room Control Complex, is not a fire rated wall and is therefore not part of LCO 4.10.4 which considers "Fire Barrier Penetration Seals, Limiting Condition for Operations." The above notwithstanding, the penetration containing the hose was sealed in June, 1984.

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

The hose penetration was sealed in June, 1984.

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

June, 1984.

B. FAILURE TO FOLLOW PROCEDURE

10 CFR Part 50, Appendix B, Criterion V states, in part: "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 Engineering Procedure 3, "Control of Design Documents," Issue 5, dated January 20, 1984, Section 4.12, "Stamping Design Documents to Show Unincorporated Change Notices," states in paragraph 4.12.B.2: "Locate controlled copies of design documents affected by the change notice (CN) or CN reissues, stamp them with the CN "caution" rubber stamp and enter the appropriate CN and CN reissue numbers in the space provided."

Contrary to the above, CN-1757 was not entered under the "caution" rubber stamp on the Control Room copy of P&I Diagram PI-21-10, FSV Controlled Document Set Number 21-30.

This is a Severity Level V Violation. (Supplement IE)  
(50/8412-1)

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

Based upon a review of Violation 50/8412-1, it is PSC's conclusion that the document caution stamping associated CN-1757 was in error relative to the Control Room copy of P&I Diagram PI-21-10. Subsequent to a review of Fort St. Vrain Engineering Procedure 3 and 1, it is PSC's position that Procedure 3, Paragraph 4.7.C should be changed to read as follows:

"Denver Document Control and Site Document Control shall update file copy sets by pulling out superseded documents and inserting new or revised documents. Except for the Control Room and Shift Supervisor's PIs, IBs, ICs and E-1203s which are updated and inserted by the Control Room Document Update Technician. Prior to inserting revised documents, the CN "Caution" stamping information shall be compared to the information contained in the DDSI."

The intent of this procedure is to have the Control Room Document Update Technician be the sole individual responsible for placing new documents (PIs, IBs, ICs and E-1203s) in the Control Room and Shift Supervisor's office. This technician will review document stamping for completeness prior to releasing drawings to these files. The Site Document Technician will continue to be responsible for any stamping changes once the drawings are placed in these files, which is consistent with the stamping review that takes place at the other Site Document Control Centers.

This change will aid in mitigating the reoccurrence of a document stamping error. PCAR-187 was initiated on July 12, 1984 to initiate the above change.

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

The above steps are appropriate to resolve any potential stamping problems.

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

The week of July 16, 1984.

#### NOTICE OF DEVIATION

- A. Public Service Company of Colorado committed, in Section 2.0 of the fire protection program review for Fort St. Vrain Nuclear Generating Station in response to Branch Technical Position 9.5-1, submitted by letters P-78167 and P-78182, dated October 13, 1978, and November 13, 1978, to certain planned improvement actions in order to meet the guidelines of the Branch Technical Position 9.5-1. The action items reviewed during this inspection were:
- 3.(a) Prohibit the bulk storage of combustible materials inside or adjacent to safety-related buildings or systems, other than that provided by station design.
  - 7. Add a hydraulic oil mist detector above each hydraulic power unit.
  - 8. Add fire detectors in the locations specified on Table 2.0-1. These detectors will alarm and annunciate in the Control Room and alarm locally.
  - 13. Remove lubricating oil stored in drums from the fuel handling purge system equipment room.



In deviation from the above: (1) three 55 gallon drums of oil were found stored in front of the Loop 2 buffer helium panel (S-2112) and one 55 gallon drum of oil was found stored just under the end of the bearing water cooler (E-2105-S); (2) the hydraulic oil mist detector had not been hooked up and is inoperable; (3) the fire detectors to be installed per Table 2.0-1 have either not been installed or made operable; and (4) lubricating oil is still being stored in drums in the fuel handling purge system equipment room. (50-267/8412-9)

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

The barrels of oil discussed in Item 3.(a) and Item 13 have been removed from the Reactor Building. There has been lack of assigned responsibility for the control of bulk storage of combustibles as required by APM P-8 which has been corrected by assigning responsibility for control of combustibles on a daily basis to the appropriate Maintenance Supervisor and Shift Supervisor. The intent is to utilize the Maintenance Supervisor and the on-shift Shift Supervisor's staff (EO's and AT's) to control bulk combustibles.

Items 7 and 8 were answered in a letter dated July 6, 1984 (P-84194) (O. R. Lee to John Collins) wherein it was committed to complete Items 7 and 8 by October, 1984.

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

- a) APM P-8, Section 4.4.4.e, will be revised to explicitly assign responsibility for control of bulk combustibles. In the interim, a memorandum has been written to assign the responsibility. The revision to APM P-8 will be accomplished by August 15, 1984.
- b) Items 7 and 8 will be completed by October, 1984 which will close out these items.

- c) To provide further assistance in reducing bulk combustibles in the Reactor Building, a modification to the fill system for the hydraulic power units will be implemented that allows the unit to be filled from grade level in the Turbine Building. This change will reduce the requirement for hydraulic oil barrels in the Reactor Building. This Change Notice will be installed by September, 1984.

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

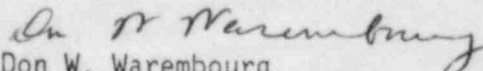
Item 2 a): August 15, 1984

Item 2 b): October, 1984

Item 2 c): September, 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