

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado
Fort St. Vrain

Docket: 50-267/84-15
License: DPR-34

Based on the results of an NRC inspection conducted during the period of June 1-30, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8538, dated March 8, 1984, the following violations were identified:

Failures to Follow 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 10 CFR 50, Appendix B by providing an individual procedure to describe the FSV program for each of the 18 Criteria. Compliance with the FSV Administrative Procedures 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 B.5.2.10)."

Technical Specification 7.4.a, "Procedures, Administrative Controls," states, in part, that, ". . . written procedures shall be established, implemented, and maintained. . . ."

1. Administrative Procedure P-2, "Equipment Clearances and Operation Deviations," Issue 9, dated May 24, 1984, states, in part,

"3.3 Operation Deviations are used whenever compliance with established operational procedures is not possible. ODR's serve to document, authorize, control and restore deviation situations to normal. System Status cards are shown in Attachment P-2B."

Standard Operating Procedure (SOP) 48-01, "Alternate Cooling Method," Issue 13, dated February 16, 1984, states, in part,

"2.2.2.1 Placing the fire water pump house fans and fire water pump P-4501 in operation on ACM power.

"(a) Open the normal feed breaker for C-7521 at turbine building MCC 1.

"(b) Open the normal feed breaker for C-7522 at turbine building MCC 3.

"(c) At the C-7521 transfer box place the toggle and knife switches in the ACM position.

"(d) At the C-7522 transfer box place the toggle and knife switches in the ACM Position."

* * *

"(f) At the ACM 480 Volt MCC close the fire pump house feed breaker."

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"3.3.1.2 Returning fire water pump house to normal power.

"(a) Open the ACM feed breaker to the fire water pump house.

"(b) At the C-7522 transfer box place the toggle switch and knife switch in the normal position.

"(c) At the C-7521 transfer box place the toggle switch and knife switch in the normal position.

"(d) Close the C-7522 normal feed breaker at turbine building MCC 3.

"(e) Close the C-7521 normal feed breaker at turbine building MCC 1."

Contrary to the above, on June 19, 1984, the SRI determined that: the C-7521/-7522 transfer box toggle and knife switches were in the ACM position, the normal feed breaker to C-7521 was open, the normal feed breaker to C-7522 was closed, and the ACM 480 V MCC breaker was open; thus placing the firewater pump house fans in a deviation situation without the issuance of an operation deviation resulting in operations personnel not being aware of the system status.

This is a Severity Level IV Violation. (Supplement I.D.) (50-267/8415-02)

2. Administrative Procedure Q-11, "Test Control," Issue 3, dated December 29, 1981, states, in part,

"4.4. NONROUTINE OR SPECIAL TEST

* * *

TEST CONDUCTOR

* * *

"10. Obtains Department and Shift Supervisor's signatures documenting permission to initiate the test"

Contrary to the above, on June 25, 1984, the NRC inspector determined that a special test was in progress without having the shift supervisor's signature documenting permission to initiate the test.

This is a Severity Level V Violation. (Supplement I.E.) (50-267/8415-08)

Pursuant to the provisions of 10 CFR 2.201, Public Service Company of Colorado is hereby required to submit to this office, within 30 days of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: JUL 23 1984