



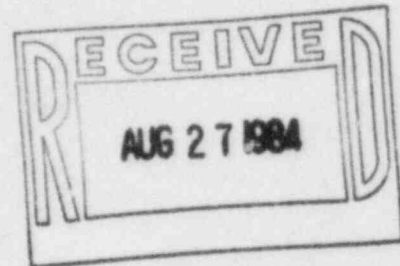
Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

August 20, 1984
Fort St. Vrain
Unit No. 1
P-84291

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 84-15

REFERENCE: NRC Letter dated July 23, 1984

Dear Mr. Johnson:

This letter is in response to the Notice of Violation and the Notice of Deviation received as a result of inspections conducted under the Resident Inspection Program at Fort St. Vrain during the period June 1-30, 1984. The following responses are hereby submitted:

Failures to Follow Procedures

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

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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."

* * *

"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)

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

The transfer box toggle and knife switches were returned to the normal position and the normal feed breaker for C-7521 was closed thereby placing the system back into normal operation. This was completed on 6/19/84.

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

The licensee was not able to determine the reason for the fans being in the ACM position. We believe it may have occurred during the checkout of the 480 volt power system after the modifications on the 480 volt buses. To avoid further violations, the surveillance procedure used to test the ACM System, SR 5.2.21-SA, will be revised to provide an independent verification of all ACM transfer switches upon completion of the surveillance test.

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

October 1, 1984.

Deviation from Commitment

PSC letter P-80020, dated February 20, 1980, in response to actions taken at FSV to implement the requirements resulting from TMI-2 Lessons Learned states, in part,

The combination of the QA surveillance program, the QA audit program and the NFSC audit program provide independent checks of plant operations and specifically shift turnover procedures on a more than adequate frequency to meet the annual requirements of the October 30, 1979 NRC letter.

In deviation from the above, the NRC inspector determined that an independent check of what the licensee defines as "plant operations and specifically shift turnover procedures" had not occurred during 1983. (50-267/8415-06) The last such inspection was QA audit QAA-301-82-01, dated February 1982.

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

- a) The Quality Assurance Operations Department reviewed QA Audits, Nuclear Facility Safety Committee (NFSC) Audits, and QA Surveillance Procedures (QASP) and Monitoring Procedures (QAMP) to determine when shift turnover procedures had been checked. The review disclosed that shift turnover was checked during QASP-301 in September, 1978, NFSC A-79-1 audit in August, 1979, and QAA-301-82-01 in February, 1982. This information was given to the SRI, and is elaborated on in I&E Inspection Report 84-15. Since no formal shift turnover procedure existed, the checks performed consisted of verifications of compliance with shift acceptance requirements.

Shift turnover evaluation has been included in the NFSC A-84-01, (Technical Specification Compliance) which is scheduled to begin August, 1984.

- b) In order to address Quality Assurance Division commitments (obligations) set forth in various correspondence, a review of the Fort St. Vrain Correspondence Data Base was initiated. The review utilized the Storage and Information Retrieval System (STAIRS) to search for commitments or on-going requirements contained in correspondence sent to Fort St. Vrain from the Commission and correspondence sent from Fort St. Vrain to the Commission, as well as internal correspondence.

There were 1,600 documents identified for review. Based on a review of those 1,600 documents, it was determined that 25 documents involved either QA commitments or on-going requirements.

A further review disclosed that 20 of the 25 documents contained commitments which have been fulfilled, and are considered closed. The remaining five documents, which contain on-going requirements, were reviewed for origin of requirement, responsibility for adherence, method(s) used to fulfill the requirement, and verification of provisions to determine that responsibilities are being met.

Based on the documents reviewed, the Quality Assurance Division has no commitments or on-going requirements beyond those already identified by the methods described above.

- c) In addition to the reviews listed above, an assessment of all known commitments was made to determine the impact on the Quality Assurance Division.

Of the 890 commitments listed, 80 were identified as affecting the QA Division, and subjected to further investigation.

Based on the review of those 80 commitments, 31 were determined to have been adequately addressed, and required no further action, 30 were assigned to the QA Operations Department for follow-up, and 19 were assigned to the QA Services Department for follow-up.

The opening and closing references for each of the 30 commitments assigned to QA Operations were gathered and reviewed to assure compliance to each commitment, and it was determined that all those commitments were adequately addressed and required no further action.

The detail sheets for each of the 19 commitments assigned to QA Services were reviewed to assure compliance with each commitment, and it was determined that all of those commitments were adequately addressed and required no further action.

Based on the documents reviewed, the Quality Assurance Division has no commitments beyond those which were identified by the methods described above and which are considered completed.

(2) Corrective steps which will be taken to avoid further deviation from commitments made to the Commission:

- a) The effectiveness of shift turnover procedures will be evaluated during performance of the NFSC audit of Technical Specification Compliance which is performed on an annual basis.
- b) A review of correspondence sent to Fort St. Vrain from the Commission (G-letters), and correspondence sent from Fort St. Vrain to the Commission (P-letters) to assess the potential impact on the QA Division has been initiated.

The review includes P and G letters from June 1, 1984 and subsequent correspondence. Those items which are identified as on-going requirements for the QA Division are designated, and listed on a computerized report which is distributed to QA Management on a monthly basis.

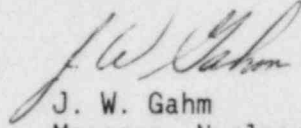
- c) No corrective steps are anticipated or required at this time.

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

- a) Full compliance will be achieved by the end of October, 1984 with the evaluation process being completed during the NFSC A-84-01 Audit.
- b) Full compliance will be achieved by September 1, 1984
- c) Full compliance was achieved on August 2, 1984 with completion of the Commitment Log Review.

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

Very truly yours,



J. W. Gahm
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

JWG/djc