

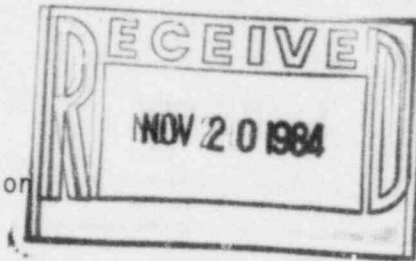


Public Service Company ^{of} Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

November 16, 1984
Fort St. Vrain
Unit No. 1
P-84489

Regional Administrator
Attn: Mr. Eric Johnson
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive
Arlington, TX 76011



SUBJECT: I & E Inspection Report 84-19

REFERENCE: NRC Letter dated October 18, 1984

Dear Mr. Johnson:

This letter is in response to the Notice of Violation received as a result of inspections conducted at Fort St. Vrain during the period August 13-17, 1984. The following response to the items contained in the Notice of Violation is hereby submitted:

Improper Distribution of Radiological Emergency Response Plan (RERP) Amendments to the NRC

10 CFR 50.54(q) requires that the licensee submit one copy of changes to the emergency plan within 30 days after the change is made to the NRC Regional Administrator (Region IV) and two copies to the NRC Document Control Desk in Washington, D.C. 10 CFR 50, Appendix E.V, requires submittal of both the emergency plan and implementing procedures under the conditions specified above.

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Contrary to the above, the following RERP amendments were not submitted to the NRC within 30 days after the change was made:

| <u>RERP</u> | <u>Effective Date</u> | <u>Date Submitted to NRC (transmittal letter)</u> |
|-------------------------|-----------------------|---|
| RERP-PCC, Issue 13 | March 15, 1984 | May 30, 1984 |
| RERP-CR-ALERT (deleted) | April 25, 1984 | May 30, 1984 |
| RERP-CR, Issue 1 | April 25, 1984 | May 30, 1984 |
| RERP-MET, Issue 3 | March 15, 1984 | May 30, 1984 |
| RERP-CR-UE (deleted) | April 25, 1984 | May 30, 1984 |
| RERP, Section 7 | April 2, 1984 | May 30, 1984 |
| RERP, Section 10B | April 2, 1984 | May 30, 1984 |
| RERP-CORE, Issue 1 | June 1, 1984 | July 25, 1984 |
| RERP-FCP, Issue 10 | June 19, 1984 | July 25, 1984 |

Also contrary to the above, all RERP amendments for 1984 have not been sent to the NRC Region IV Regional Administrator or the NRC Document Control Desk, Washington, D.C.

This is a Severity Level IV Violation. (Supplement VIII)
(267/8419-01)

- (1) The corrective steps which have been taken and the results achieved:
 - (a) The Document Distribution Handbook will be updated to show that copies of the Radiological Emergency Response Plan (RERP) and Implementing Procedure revisions will be forwarded to the Regional Administrator (one copy) and the Document Control Desk in Washington, D.C. (two copies) within 30 days of revision.
 - (b) All individuals involved with the distribution of RERP related documents have been re-instructed with respect to the contents of 10 CFR 50.54(q).
 - (c) A complete set of the RERP and Implementing Procedures will be sent to the NRC Region IV Regional Administrator (one copy) and the NRC Document Control Desk in Washington, D.C. (two copies).

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

Verification that RERP and Implementing Procedure revisions are being distributed in accordance with 10 CFR 50.54(q) will be incorporated into the quarterly "non-Technical Specification" surveillance test pertaining to emergency planning items.

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

Complete copies of the RERP and Implementing Procedures will be sent to the appropriate NRC offices by November 30, 1984. The Document Distribution Handbook will be updated to reflect the requirements of 10 CFR 50.54(q) by December 31, 1984.

In response to problems identified during the exercise regarding ineffective management of certain emergency response centers, the operation of the centers has been carefully reviewed. Few problems have been identified at the Executive Command Post (ECP) and the Forward Command Post (FCP), in fact, many concepts employed at these centers are to be applied to activities at the Technical Support Center (TSC), Personnel Control Center (PCC), and in the Control Room.

RERP Implementing procedures for the PCC and TSC have been revised in group meetings with management individuals involved with the centers. The revisions will eliminate most of the clerical duties of the Directors, leaving them free to perform decision making functions and provide direction for their staff and, overall, for the centers. Actual procedure revisions are in process for the TSC and the PCC. A group Control Room emergency center meeting involving the Superintendent of Operations and selected Shift Supervisors is scheduled for later in November.

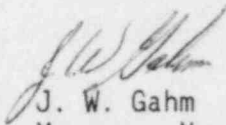
When the revised procedures become effective, training will be performed and emergency center mock activations will be held to demonstrate improved management effectiveness. The activations will be critiqued to assess the success in achieving this goal.

With regard to problems encountered with personnel not following implementing procedures during the exercise, training will be conducted and all potential RERP participants will be tested to demonstrate their knowledge of which procedures each would utilize during emergency response, and which sections are applicable to their specific functions.

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Should you have any further questions, please contact
Mr. Frank J. Novachek, (303) 571-7436, ext. 201.

Sincerely,



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

JWG:FJN/djc