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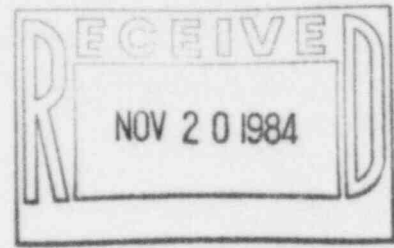


Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

November 16, 1984
Fort St. Vrain
Unit No. 1
P-84500

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



SUBJECT: I & E Inspection Report 84-22

REFERENCE: NRC Letter dated October 19, 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 1-31, 1984. The following response to the items contained in the Notice of Violation is hereby submitted:

A. Failure to Follow Procedures

10 CFR 50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instruction, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings." This requirement is implemented by the licensee's Final Safety Analysis Report, Section B.5.2, "Quality Assurance Programs," and Technical Specification 7.4, "Procedures - Administrative Controls."

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1. Inadequate Weld Control

- a. Procedure WM-1, "General Specification for Implementation of the Welding Manual," Issue 2, dated November 16, 1981, requires that weld data sheets be attached to the control work procedure (CWP); that the required testing and visual inspection requirements be entered on the weld data sheet; that weld rod control shall be in accordance with specification WM-7; and that weld data reports shall be completed upon completion of applicable requirements for the weld joint(s).

Contrary to the above, the NRC inspector determined during a review of a design change to the steam generator manon flanges that weld data sheets were not attached to the CWP, weld data sheets did not contain the required testing and visual inspection requirements, weld rod control was not in accordance with WM-7, and weld data reports were not completed.

- b. Procedure WM-4, "Preheat and Postweld Heat Treatment Specification," Issue 1, dated April 6, 1981, requires that the post weld heat treatment (PWHT) specification data and report sheet shall be completed and attached to the CWP, that certain mandatory QA/QC inspection hold points be identified during the PWHT operation, and that the PWHT chart be signed/dated by the QA/QC inspector.

Contrary to the above, the NRC inspector determined during the review of design change referenced above that PWHT specification data and report sheets were not completed and/or attached to the CWP, mandatory QA/QC inspection hold points were not identified, and the PWHT charts were not signed/dated by QA/QC.

- c. Procedure WM-7, "Covered Electrode/Filler Metal Classification, Identification, Control and Storage Specification," Issue 2, dated November 20, 1981, requires coated electrodes to be controlled by a weld rod control form.

Contrary to the above, the NRC inspector determined during the review referenced above that electrode control was not recorded on the weld rod control form.

This is a Severity Level IV Violation.
(Supplement I.D.) (50-267/8422-01)

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

Weld data sheets were revised to incorporate testing and inspection requirements. The weld data reports were completed.

Post weld heat treatment data and report sheets were completed and attached to the CWP's.

Discussions with the inspectors confirmed that all mandatory hold point requirements were met; i.e., thermocouple attachment, insulation, and the review of PWHT charts. All of the PWHT charts were reviewed, signed and dated by the QA/QC inspector.

Although this job was performed by contract personnel, the Fort St. Vrain welding supervisor has been specifically reminded of the requirement for attaching the applicable paperwork to the CWP package.

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

The Fort St. Vrain welding supervisor will re-emphasize the importance of the proper completion of documentation to Company welders.

The Fort St. Vrain Superintendent of Maintenance will develop a training lesson plan for contract welders to instruct them on procedural requirements. Fort St. Vrain welders will also complete this training.

The Administrative Procedure for Controlled Work Procedures (G-9) has been revised and is currently in the approval cycle. Implementation of the revised G-9 procedure will include the designation of a work coordinator who will be responsible for maintaining the documentation packages.

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

Development of a training lesson plan will be completed by December 15, 1984. Retraining of Fort St. Vrain welding personnel will be completed by December 31, 1984. Training of contract welders will be completed before these welders are permitted to perform welding in the plant.

The revised G-9 Controlled Work Procedure will be approved by December 15, 1984. Supplemental training on the implementation of this procedure will be completed by January 30, 1985 (to accomodate shift workers).

2. Inadequate QC Design Controls

Procedure QCIM-5, "Review of Controlled Work Procedures (CWPs)," Issue 1, dated January 23, 1984, requires that the QA/QC reviewer shall insert appropriate inspection points in the CWP; that hold points shall be specified when it is necessary for work to stop in order to perform the inspection; and that completed CWPs will be reviewed by QA/QC for completeness.

Contrary to the above, the NRC inspector determined during a review of a design change to the steam generator marmon flanges that no inspection points had been inserted in the CWP-Deviation Reports for CWP 84-120; a hold point had not been assigned to an item (radiography) that required all work to stop in order to perform the inspection; and the review of completed CWPs 83-171 and 84-74 had not been performed.

This is a Severity Level IV Violation.
(Supplement I.D.) (50-267/8422-02)

- (1) The corrective steps which have been taken and the results achieved:
 - 1) CWP-Deviation reports were reviewed by QA/QC and Inspection points were inserted on August 23, 1984.
 - 2) New CWP's were written which deleted DR 84-120-1A. Appropriate inspection points were included in the new CWP's (84-200 through 84-205).
 - 3) CWP's 83-171 and 84-74 have not been routed to QA/QC for final review as required by QCIM-5, therefore the CWP's are still open at this time.

- (2) Corrective steps which will be taken to avoid further violations:
 - 1) QCIM-5 will be revised to include review of CWP Deviation Reports. In addition QA/QC has been placed on the Routing Slip for all CWP-DR's.
 - 2) Revision to G-9 "Controlled Work Procedures" will assure all CWP's and CWP-DR's will be routed through QA/QC for insertion of appropriate inspection points.

- (3) The date when full compliance will be achieved:
 - 1) QCIM-5 will be revised by 12/01/84.
 - 2) Procedure G-9 will be revised by 12/15/84.

3. Inadequate Design Control

- a. Administrative Procedure G-9, "Controlled Work Procedure," requires that CWP-Deviation Reports (DRs) affecting tagging boundaries shall require shift supervisor approval; that CWPs shall be processed, controlled, and implemented in accordance with Section 4.1; and that the shift supervisor shall verify that all the required work, tests, and inspections are complete and that any required operating procedure revisions or deviations are issued prior to returning the system to service.

Contrary to the above, the NRC inspector determined that CWP-DRs for CWP 84-120 affected the tagging boundaries and were not approved by the shift supervisor; CWPs 83-171 and 84-74 were not processed, controlled, and implemented in accordance with Section 4.1; and the systems addressed in CWPs 83-171 and 84-74 were returned to service without the shift supervisor performing the required verifications.

- b. The licensee's response (P-82049, dated February 22, 1982) to Violation 8126-03, as identified in NRC Inspection Report 81-26, states, in part:

"ITEM 3 In order to further reduce the possibility of a system being returned to service until all required work is complete, an additional review will be required for those cases when a system must be returned to service prior to final completion of the work package. In general, work accomplished under a Controlled Work Procedure (CWP) will contain all required signatures on the CWP cover sheet prior to placing the affected system(s) in service. In cases where all signatures are not on the cover sheet prior to placing the system(s) in service, the Shift Supervisor shall obtain management approval prior to releasing the affected system(s) into service. An Operations Order pertaining to the management approval requirement will be issued by March 7, 1982."

Contrary to the above, the NRC inspector determined that the shift supervisors were not following this corrective action and were not verifying completion of CWPs prior to returning systems to service.

- c. The licensee's response (P-83368, dated November 10, 1983) to Violation 8324-01, as identified in NRC Inspection Report 83-24, states, in part:

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

"Administrative Procedures will be revised as necessary to account for the weaknesses identified through the Quality Assurance monitoring program completed on November 9, 1983, as well as those identified in the Notice of Violation"

Contrary to the above, the NRC inspector determined that the licensee's Administrative Procedures revision still does not prevent the shift supervisor from returning a system to service without performing the required verifications as previously identified in the Notice of Violation.

This is a Security Level IV Violation.
(Supplement I.D.) (50-267/8422-03)

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

Nuclear Production, Nuclear Engineering, and Quality Assurance personnel have mutually developed a revised Administrative Procedure (G-9) for Controlled Work Procedures. This revised procedure is currently in the approval cycle.

Included in the revised procedure is the requirement for the Shift Supervisor to insure that work is completed prior to clearances being returned. Specifically,

"When satisfied that all the required work, tests, and inspections are complete and that any operating procedure revisions or deviations are issued, authorizes the removal of the clearance(s) and returns the system/equipment to service."

Also included in the revised G-9 is the procedural change which prohibits the usage of CWP Deviation Reports which affect tagging boundaries.

Via memo NFG-84-0151 site engineering personnel were made aware of the difficulty in the processing of CWP Deviation Reports. Interim corrective actions were specified.

Via memo PPC-84-2281, plant Shift Supervisors were made aware of the specific requirement that clearances are not to be returned or hung unless the CWP is in hand.

The Station Manager personally instructed key personnel from Results, Engineering, Maintenance, Scheduling, and Operations on the interim corrective actions and the revised G-9 procedure.

The Station Manager personally discussed the implementation of CWP controls with the Superintendent of Operations and the Shift Supervisors.

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

Formal training to supplement normal training will be provided when the revised G-9 procedure is approved.

Formal implementing procedures to supplement the revised G-9 will be developed.

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

The formal training to supplement normal G-9 training will be completed by January 30, 1985 (to accommodate shift workers).

Interim implementing procedures for the revised G-9 will be in place by December 15, 1984. Finalized implementing procedures, and associated training, will be completed by January 30, 1985.

B. Failure to Submit Adequate Information

Code of Federal Regulations 10 CFR 50.54(f) states:

"(f) The licensee will at any time before expiration of the license, upon request of the Commission submit written statements, signed under oath or affirmation, to enable the Commission to determine whether or not the license should be modified, suspended or revoked."

Inspection and Enforcement Bulletin No. 80-11, "Masonry Wall Design," dated May 8, 1980, required that a reevaluation of the design adequacy of masonry block walls be made, that this reevaluation be submitted in detail to the NRC in two parts (within 60 and 180 days of the date of the bulletin), and the report be submitted under oath or affirmation.

NRC Letter Robert A. Clark to Mr. O. R. Lee, dated July 21, 1982, was a request for additional information due to the licensee's reevaluation report not providing the detail required to facilitate proper evaluation. In part, this letter requested:

"14. Provide details of wall modifications with drawings. Also, provide a sample calculation to illustrate that the walls can be qualified under working stress design conditions after modification."

Contrary to the above, on August 20, 1984, the NRC inspector determined that the licensee's initial 60-day response (P-80198, dated July 7, 1980) and initial 180-day response (P-80381), dated October 28, 1980), as well as supplemental responses, were not submitted under oath or affirmation. It was also determined that the licensee's response (P-82354, dated August 24, 1982) to the above NRC request for additional information, dated July 21, 1982, did not provide a complete detail of wall modifications with drawings as required. The incomplete submittal caused the Commission's Safety Evaluation Report (SER), dated October 13, 1983, to be in error concerning the evaluation of the licensee's response to item 14 above. Therefore, several different modifications have been made to Fort St. Vrain's masonry walls without the Commission's knowledge and approval.

This is a Severity Level IV Violation. (Supplement I.D.)
(50-267/8422-06)

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

Item A: Responses not submitted under oath or affirmation.

A procedure ENG-7, Issue 4, implemented February 8, 1983, for other reasons, will eliminate this from happening in the future.

Item B: Details of masonry block wall modifications with drawings and sample calculations not provided.

This was a misinterpretation of the NRC request, in that PSC submitted a sample of the modification and calculation. A procedure ENG-7, Issue 4, to eliminate problems of interpretation or oversight of questions to which PSC is responding was implemented on February 8, 1983.

PSC implementation of the above procedural change has been very effective in reducing, if not eliminating, this type of problem in responding to NRC inquiries.

Item C: The licensee made modifications to masonry walls without having the review and approval required by I&E Bulletin 80-11.

PSC is not aware that I&E Bulletin 80-11 requires NRC approval of modifications to masonry block walls and requests a clarification of this point.

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

Corrective actions were taken as appropriate with the issuance of procedure ENG-7, Issue 4, on February 8, 1983.

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

February 8, 1983.

With respect to actions taken or planned to improve the effectiveness of management control over license requirements at Fort St. Vrain, Public Service Company of Colorado has undertaken a number of measures:

- 1) Policies regarding disciplinary actions to be taken in the event of failure to follow procedure incidents have been fortified.
- 2) The practice of clarifying administrative procedures by long term use of memos is being discouraged. Where such clarification is necessary, appropriate procedure revisions will be developed and implemented.
- 3) Procedure revisions required by commitments to the NRC will be specifically identified as such within the procedure itself. This will preclude inadvertent deletion in subsequent issues.
- 4) Direct management involvement will be increased in those areas exhibiting weakness to include procedure development and observation of work practices.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "J. W. Gahm for".

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

JWG/djc