

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado  
Fort St. Vrain

Docket: 50-267/84-26  
License: DPR-34

Based on the results of an NRC inspection conducted during the period of September 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:

Failure to Follow Procedures

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

Administrative Procedure G-9, "Controlled Work Procedures," Issue 5, dated August 8, 1984, requires controlled work procedures (CWP) to be prepared in accordance with the CWP manual.

Controlled Work Procedure Manual, Issue 1, dated October 16, 1981, Attachment CWPM-1C, "General Mechanical Planning Considerations and Mechanical Planning Checklist," requires that for installed systems and components that should be cleaned, flushed, and conditioned in accordance with ANSI N45.2.1-1973, "Cleaning of Fluid Systems and associated Components During the Construction Phase of Nuclear Power Plants," specific steps should be specified in the CWP to accomplish this.

Contrary to the above, the NRC inspector determined that the CWPM was not being used during the preparation of CWPs. Specifically the NRC inspector determined that the required flushing requirements had not been incorporated into CWP 84-113 for the modification to the high pressure separator piping on Loop 2.

This is a Severity Level IV Violation. (Supplement I.D.) (50-267/8426-02)

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.

OCT 24 1984

Dated: \_\_\_\_\_

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