

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado
Fort St. Vrain

Docket: 50-267/84-29
License: DPR-34

Based on the results of an NRC inspection conducted during the period of October 1-31, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violation was identified:

1. Failure to Follow Procedures

- a. 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 Updated Safety Analysis Report, Section B.5.2, "Quality Assurance Programs."

Contrary to the above, MP 12-12, "Maintenance and Repair of Control Rod Drive," Section 4.4, for the assembly of the shim motor and brake subassembly on control rod drive 21, an activity affecting quality, had a hold point and procedural steps that were not signed off as required. It was also determined that a step had been overlooked resulting in the subsequent determination by the workers and maintenance QC that the shim motor and brake subassembly had been incorrectly assembled.

This is a Severity Level IV violation. (Supplement I.D.)
(50-267/8429-02)

- b. 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."

Contrary to the above, requirements for controlling and documenting safety-related design changes as contained in Procedures ENG-1, "Procedure for Control of Changes and Modifications," G-3, "Design Control System," and G-9, "Controlled Work Procedures," were not followed as indicated below:

- (1) The construction completion notification form for design change notice (CN) CN 1629/1629A did not reference the NCRs that were issued during the modification;
- (2) The cover page for reissued design change CN 1444A did not indicate that the design background information package had

changed and the CN package contained documentation of work on two hangers that were not specifically authorized by the CN;

- (3) No record of controlled work procedure CWP 82-58 used in design change CN 1436B was available; and
- (4) Reissues of CN 1436 did not update information changed by two field changes that were issued during the modification work.

This is a Severity Level IV violation. (Supplement I.D) (50-267/8429-03)

2. Design Verification

10 CFR Appendix B, Criterion III, requires that designs be verified or checked for adequacy by design review, simplified calculations or suitable tests, and that these measures shall be similarly employed for design changes. This requirement is amplified in the licensee's approved quality assurance program, Updated Safety Analysis Report, Section B.5.19.11, which adopts ANSI Standard N45.2.11-1974 to implement Criterion III.

Contrary to the above, the licensee issued design changes DR-83-150-1-I and DR-82-19-1-B to change notices CN 1629 and CN 1436, which authorized safety-related modifications, based on engineering judgement for which no design verification or checking was performed.

This is a Severity Level IV violation. (Supplement I.D) (50-267/8429-04)

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 will be 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.

Date: FEB 26 1985