

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-267/85-30

License: DPR-34

Docket: 50-267

Licensee: Public Service Company of Colorado (PSC)  
P. O. Box 840  
Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

Inspection At: Fort St. Vrain Nuclear (FSV) Generating Station, Platteville,  
Colorado

Inspection Conducted: October 5 - November 30, 1985

Inspector:



R. E. Farrell, Senior Resident Inspector (SRI)

12-12-85  
Date

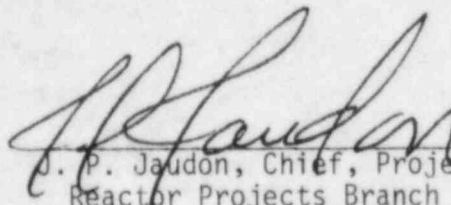
Inspector:



R. C. Stewart, Reactor Inspector

1/3/86  
Date

Approved:



J. P. Jaudon, Chief, Project Section A  
Reactor Projects Branch

1/9/86  
Date



R. E. Ireland, Chief, Operations Section,  
Reactor Safety Branch

1/7/86  
Date

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Inspection Summary

Inspection Conducted October 5 through November 30, 1985 (Report 50-267/85-30)

Areas Inspected: Routine, unannounced inspection of operational safety verification, previous inspection findings, winter protection, surveillances, and 10 CFR 21 review. The inspection involved 164 inspector-hours onsite by two NRC inspectors.

Results: Within the five areas inspected, no violations or deviations were identified.

## DETAILS

### 1. Persons Contacted

#### Principal Licensee Employees

D. Alps, Security Supervisor  
T. Borst, Support Services Manager/Radiation Protection Manager  
\*R. Craun, Site Engineering Manager  
\*M. Deniston, Shift Supervisor  
\*J. Eggebroten, Superintendent Technical Services Engineering  
\*D. Evans, Superintendent Operations  
M. Ferris, QA Operations Manager  
\*C. Fuller, Station Manager  
\*S. Hofstetter, Nuclear Licensing Engineer  
\*J. Gahm, Manager Nuclear Production  
\*F. Novachek, Technical/Administrative Services Manager  
\*T. Prenger, QA Services Manager  
\*L. Singleton, Manager QA  
\*D. Warembourg, Manager Nuclear Engineering

The SRI also contacted other licensee and contractor personnel during the inspection.

\*Denotes those attending the exit interview conducted December 2, 1985.

### 2. Operational Safety Verification

The SRI reviewed licensee activities to ascertain that the facility is being operated safely and in conformance with regulatory requirements and that the licensee's management control system is effectively discharging its responsibilities for continued safe operation.

The review was conducted by direct observation of activities, tours of the facility, interviews and discussions with licensee personnel, independent verifications of safety system status and limiting conditions for operations, and review of facility records.

Logs and records reviewed included:

- . Shift supervisor logs
- . Reactor operator logs
- . Equipment operator logs
- . Auxiliary operator logs
- . Technical specification compliance logs

- . Operations deviations reports
- . Temporary configuration reports

During tours of accessible areas, particular attention was directed to the following:

- . Monitoring instrumentation
- . Radiation controls
- . Housekeeping
- . Fluid leaks
- . Piping vibrations
- . Hanger/seismic restraints
- . Clearance tags
- . Fire hazards
- . Control room manning
- . Annunciators

No violations or deviations were identified.

### 3. Previous Inspection Findings

(CLOSED) Open Item (50-267/8519-01): Control Rod Drive Mechanism Surveillance Procedures. The licensee incorporated the interim Technical Specification surveillance requirements for control rod drive mechanisms in approved surveillance procedures. This was verified prior to the plant going critical in July 1985, but was not previously documented in an inspection report.

This item is closed.

(CLOSED) Open Item (50-267/8519-02): Verification that Surveillances are Current. This item required verification that the plant surveillances required by Technical Specifications were current prior to the plant going critical. This was done prior to the plant going critical in July 1985, but was not previously documented in an inspection report.

This item is closed.

#### 4. Winter Protection

The SRI reviewed the Technical Specifications for winter protection requirements. The Technical Specifications do not address winter protection. The licensee did commit in response to IE Bulletin 79-24 that all piping exposed or subject to possible freezing is insulated, heat traced, or otherwise protected.

The licensee has a list of all involved heat tracing and has verified that all involved heat tracing is operable. The SRI reviewed the licensee's list of heat trace circuits and interviewed plant management regarding heat trace status.

No violations or deviations were identified.

#### 5. Surveillances

The SRI reviewed selected surveillance procedures for compliance with Technical Specifications and observed performance of selected portions of these procedures. Procedures reviewed this inspection period included:

- . SR 5.4.1.3.2.b-M, "Feedwater Flow Test"
- . ESR 8.1.1a-1.5Y, "Radioactive Gaseous Effluent System Calibration"
- . RP-7, "Calibration and Maintenance of Bourdon Tube Pressure Gauges"

During performance of step 5.12.9 of Procedure ESR 8.1.1a-1.5Y, control room annunciator light C1-1 in aisle 1 should have lit according to the procedure. Instead annunciator light A3-6 in aisle 3 lit. The control room operator informed the SRI and the licensee's I&C technician that a plant modification had been performed that transferred the annunciator function of window C1-1 in aisle 1 to window A3-6 in aisle 3.

Subsequent interviews with plant personnel confirmed that plant design changes are reviewed for effect on plant procedures and that procedures are to be revised as required. The change to Procedure ESR 8.1.1a-1.5Y was not identified in this review. There was no safety significance and no other examples of items missed in this review were identified. This is considered an isolated incident.

No violations or deviations were identified.

#### 6. Followup Review - Reported Part 21

During the period October 22-25, 1985, a Region IV inspector conducted a followup review of a 10 CFR 21.21 report, including 14 exhibits, dated November 5, 1984, which has been submitted by the law firm of Bernstein & Longest in behalf of a consultant formerly employed by PSC.



### Background

The consultant's concerns were relative to disagreements which he had with the PSC Nuclear Engineering Department (NED) concerning dispositions of findings identified during a piping and support seismic qualification audit (Audit QAA-1401-82-01) performed by him as an audit team leader during the period December 1982 through January 1983. This audit was conducted in conjunction with the licensee's major piping hanger rework and seismic redocumentation program resulting from IE Bulletin 79-14, "Seismic Analyses for As-Built Safety-Related Piping Systems," dated July 2, 1979, and supplement dated August 15, 1979.

On November 5, 1984, prior to the submitting of the 10 CFR 21.21 report by Bernstein & Longest, the consultant had expressed his concerns (telephonically) with members of the NRC Region IV staff; in this telephone call, one consultant condensed a number of his numerous concerns into three principle questions:

- . What was the status of two corrective action requests (CAAR 599 and CAAR 600) initiated as a result of audit findings?
- . Was there a 10 CFR 21 evaluation performed by the appropriate committee; how was it handled; and what was the disposition?
- . Was the NRC aware of audit results in conjunction with Bulletin 79-14 and were they satisfied?

The consultant also emphasized that his concerns were not a safety problem as such, but rather he believed that they were a question of procedures (on use by the licensee) and/or a lack of licensee procedures. The consultant also questioned the licensee's methodology for closing audit items.

### Documents Reviewed

- . 10 CFR 21.21 Report (including 14 attached exhibits) dated November 5, 1984 (Exhibit 11 is a copy of the final audit report dated March 9, 1983).
- . PSC Part 21 Report evaluation P21-0019, initiated by the QA manager in behalf of the consultants, dated September 27, 1984.
- . File folders retained by the licensee's Nuclear Engineering Department(NED), including audit notes, comments, and calculations.
- . QA/QC document control files, including CAAR 599 and CAAR 600 disposition evaluations, dated October 10, 1984.
- . NRC IE Inspection Reports: 50-267/79-14; 79-19; and 83-15, dated October 16, 1979, December 26, 1979, and June 24, 1983, respectively.

- . PSC seismic piping redocumentation status reports to NRC: PSC letters P-77198, dated September 22, 1977; P-79161, dated August 1, 1979; P-79198, dated September 4, 1979; P-79238, dated October 15, 1979; P-30029, dated February 15, 1980; P-80091, dated April 23, 1980; P-80194, dated June 30, 1980; P-80282, dated August 25, 1980; P-80380, dated October 28, 1980; P-80442, dated December 23, 1980; P-81019, dated January 20, 1981; P-81172, dated June 18, 1981; P-82004, dated January 4, 1982; P-82174, dated June 1, 1982; P-83113, dated March 21, 1983; and P-84054, dated February 17, 1984.
- . PSC procedures: SDCC 005, 007, 010, 011, 012, 014, 019, 021, 024, and 025; QACP 3-10, and QACP 3-11.
- . PSC FSAR, Sections 1.4.5-1, 14.1.1.1, and Appendices B, C, and H.

#### Findings

The final disposition and closeout of CAARs 599 and 600 were completed on October 10, 1984. This was subsequent to the licensee's internal evaluation review and disposition of the Part 21 report evaluation (submitted January 26, 1984, and closed September 27, 1984). The consultant's contract with PSC was not renewed subsequent to December 1983; therefore, he was not cognizant of the final disposition of his reported concerns and audit findings.

During the documentation review, the NRC inspector reviewed the PSC internal Part 21 report evaluation. It was noted that the PSC QA manager submitted the consultants itemized concerns (letter NPC 3748), CAARs 599 and 600 to the PSC Part 21 evaluation team on behalf of the consultant on January 3, 1984.

In reviewing the referenced documents related to the resolution and disposition of the above matters, the NRC inspectors found no problems with the licensee's disposition and close-out, in that the concerns were not reportable within the meaning of "a substantial safety hazard" as stipulated in 10 CFR 21.21.

In addition, the NRC inspector reviewed NED file folders which included a copy of the original draft audit report containing handwritten comments and notes (undated), stated to be made by the consultant, reflecting resolution of many of the audit findings as well as conflicting statements not consonant with the reported Part 10 CFR 21 issues.

On October 25, 1985, the NRC inspectors accompanied by the NED nuclear site engineering manager, made a partial plant walkdown in order to observe physical hanger as-built conditions that were issues of the method used in stress calculations expressed by the consultant as lacking "sufficient conservatism" to compensate for problem areas. The NRC inspector also visually examined the fillet weld on hanger 9B-H-46919 which was a

point of disagreement as to whether the weld area was properly cleaned prior to welding. The inspectors observed that, although the weld appeared to be sound, the weld has no structural significance. At the conclusion of the walkdown, the NRC inspector had no further questions regarding the final disposition of the 10 CFR 21 report issues.

In reviewing prior NRC inspection reports, there were no direct references found that would indicate that the NRC resident inspectors had been cognizant of the specific audit involving the consultant; however, there were adequate records to reflect continued inspection involvement and final concurrence by the NRC resident inspectors regarding the redocumentation program by the licensee in response to IE Bulletin 79-14.

No violations or deviations were identified.

7. Exit Interview

An exit interview was conducted December 2, 1985, attended by those indicated in paragraph 1. At this time the SRI reviewed the scope and findings of the inspection.