

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-267/85-33

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 Generating Station, Platteville,  
Colorado

Inspection Conducted: December 9-13, 1985

Inspector:

*M E Skow*

M. E. Skow, Project Engineer, Project Section A,  
Reactor Projects Branch

*12/27/85*  
Date

Approved:

*J P Jaudon*

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

*1/2/86*  
Date

Inspection Summary

Inspection Conducted December 9-13, 1985 (Report 50-267/83-33)

Areas Inspected: Routine, unannounced inspection of nonlicensed operator training and follow-up to NRC Inspection Report 50-267/85-26. The inspection involved 23 inspector-hours onsite by one NRC inspector.

Results: Within the areas inspected, two violations were identified (paragraph 2 ).

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DETAILS

1. Persons Contacted

- \*J. W. Gahm, Manager, Nuclear Power Operations
- \*C. L. Fuller, Station Manager
  - L. W. Singleton, Manager, Quality Assurance
  - R. L. Craun, Site Engineering Manager
- \*F. J. Borst, Support Services Manager
- \*M. J. Ferris, QA Operations Manager
- \*F. J. Novachek, Technical/Administrative Services Manager
- \*W. L. Craine, Superintendent Maintenance
- \*R. Burchfield, Superintendent Nuclear Betterment Engineering
- \*T. D. McIntire, Nuclear Site Engineering Supervisor
- \*S. Hofstetter, Nuclear Licensing and Fuel
  - S. Willford, Superintendent of Training
  - R. Rivera, Operator Training Supervisor
  - G. Weiderspoon, Auxiliary Tender

\*Denotes those present at the exit interview

2. Followup to NRC Inspection Report 50-267/85-26

The NRC inspector performed a followup inspection to verify the findings of NRC Inspection Report 50-267/85-26, hereafter referred to as the PAT report. The NRC inspector also determined what, if any, corrective actions had been taken by the licensee. The paragraph numbers of the PAT report are used below to discuss the specific concerns of that report. Specific item numbers are also identified, but some item numbers are made up of several parts in various paragraphs.

PAT Report Paragraph 2.a.(2), Open Item 8526-01

Procedure P-1, "Plant Operations," did not provide adequate control of temporary plant modifications. Specifically, Section 4.9, "Control of Temporary Configuration," contained no provisions for ensuring the temporary nature of modifications made under that procedure. At the time of the inspection, 37 Temporary Configuration Requests (TCRs) were open from 2 to 9 years. The licensee had initiated permanent Design Change Notices (DCNs) for several of these TCRs, however, at least 11 of these DCNs had been in preparation for over 2 years. This lack of control of temporary changes resulted in permanent changes being made to the station without the necessary reviews being conducted.

Inspection Followup

NRC Inspection Report 50-267/85-31 discussed the licensee's programmatic corrective action. During this followup, the NRC inspector reviewed the licensee's TCRs that were maintained in the control room. The more recent

TCRs all appeared to have had safety evaluations performed. This was in keeping with the licensee's corrective action. The older TCRs appeared to have had safety evaluations performed only if the TCRs had been marked as "Safety Related." The NRC inspector found two older TCRs that installed temporary gages. These gages were used by the operators to verify compliance with Technical Specification Limiting Condition of Operation (TS LCO) 4.2.7, but the TCRs, 820427, dated April 13, 1982, and 820503, dated May 1, 1982, were neither marked as "Safety Related" nor as Technical Specification involved. Thus, they were equipment required to support Technical Specifications. Changes to these equipments required a safety evaluation as described in 10 CFR 50.59. No safety evaluation had been performed at the time of the PAT inspection. In addition, the licensee could not show that the gages had been calibrated. The licensee stated that there was not a program in place to routinely calibrate temporary gages. The failure to perform a safety evaluation of TCRs used to verify compliance with LCOs is an apparent violation (8533-01). This portion of Unresolved Item 8526-02 is closed because it has been incorporated into the apparent violation.

The licensee committed to calibrate the gages installed by TCRs 820427 and 820503 prior to plant startup.

PAT Report Paragraph 4.a.(4), Part 1, Unresolved Item 8526-05

Gearcase oil used for Motor Operated Valve (MOV) applications differed from that recommended by the vendor manual and may not have been suitable for the environment of all plant MOVs. Procedure MP 39-3 and the vendor manual specify the use of SAE 80 EP oil in the gearcase of motor operated valves. Discussions with maintenance personnel revealed that Mobil 629 oil was being used for all MOV applications. The licensee had not performed an engineering evaluation to determine that the Mobil 629 oil was suitable for all MOV applications or compatible with residual oil that may have been in the gearcase.

Inspection Followup

Mobil 629 is an SAE 40 oil. The vendor maintenance manual specifies SAE 80 EP oil. In response to the PAT report, the licensee initiated Action Request GSAR-979 to resolve the issue of oil suitability. The use of the Mobil 629 oil is considered a design change, and the failure to perform an appropriate evaluation of the oil suitability is an apparent violation of 10 CFR 50.55 (8533-02). This portion of Unresolved Item 8526-05 is closed because it is incorporated into the apparent violation.

The licensee committed to complete evaluation of the oil suitability prior to plant startup.

### 3. Nonlicensed Staff Training

This inspection was to evaluate the effectiveness of the training programs for the nonlicensed staff. As a starting point, the NRC inspector selected an event that the licensee reported to the NRC duty officer on December 4, 1985. During this event, an Auxiliary Tender inadvertently tripped a breaker for a bearing water pump which resulted in a loop shutdown. The NRC inspector found that the Auxiliary Tender had received documented on-the-job training in breaker operation. He had not received formal classroom training in breaker operation. However, he participated in the development of the training elements for formal classroom training which, in effect, demonstrated his knowledge of breaker operation. In the event selected, the tender stated that he had identified the proper breaker he was to rack out. He went to the end of the panel to get the crank returned to and tripped the wrong breaker. The licensee is evaluating the training task elements to determine if the classroom training can be modified to preclude this kind of lapse of concentration by an operator.

The development of the task elements above was part of the licensee's program to upgrade training to support INPO accreditation. The licensee stated that they expect to be ready for Auxiliary Tender training INPO accreditation by December 31, 1985. Documentation reviewed by the NRC inspector appears to support that date.

In addition, classroom training was observed and an individual training record was reviewed. No violations or deviations were noted.

### 4. Exit Interview

An exit interview was held on December 13, 1985, with those personnel denoted in paragraph 1 of this report. The NRC senior resident inspector also attended this meeting. At the meeting, the scope of the inspection and findings were summarized. The licensee also confirmed those commitments identified in paragraph 2.