



Public Service
Company of Colorado

P.O. Box 840
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February 11, 1988
Fort St. Vrain
Unit No. 1
P-88070

R.O. WILLIAMS, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Docket No. 50-267

SUBJECT: I&E Inspection Report 87-25

REFERENCE: NRC Letter, Callan
to Williams, dated
January 15, 1988
(G-88006)

Gentlemen:

This letter is in response to the Notice of Violation received as a result of the inspection conducted by Messrs. R. E. Farrell and P. W. Michaud during the period October 18 through November 21, 1987. The following response to the item contained in the Notice of Violation is hereby submitted:

Failure to Make Management Notifications Required by Section 2.1 and Attachment 2 of the "Fort St. Vrain Medical Emergency Plan," Issue 20.

The licensee's Technical Specification AC 7.4.a.5 requires written procedures be established and implemented covering emergency plan implementation.

The "Fort St. Vrain Medical Emergency Plan (MEP)," Issue 20, including Procedural Deviation Reports 87-2039 and 87-2042 prescribes those actions taken in the event of onsite injury to personnel.

Contrary to the above, on October 26, 1987, the shift supervisor failed to make the management notifications required by Section 2.1 and Attachment 2 of MEP, Issue 20 when a contractor electrician had injured himself in a fall while onsite and had been transferred by ambulance to an off site medical facility.

This is a Severity Level IV violation. (Supplement IV)
(267/8721-01)

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(1) The reason for the violation if admitted:

The violation of the procedural steps is admitted. The violation is due to a procedural inadequacy in the "Fort St. Vrain Medical Emergency Plan (MEP)." The procedure was not clear with regards to implementation based on an injury which was not related to plant operational or equipment emergency conditions. Shift personnel did not believe that the procedure applied to this event. Subsequent evaluation by plant management has confirmed that the procedure was not intended to address this type of situation. It should be noted that the victim's needs were attended in a timely manner, and that transport via ambulance to the medical facility is determined on a case-by-case basis.

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

The Superintendent of Operations reviewed the incident with each Shift Supervisor. The requirements and applicability of the "Fort St. Vrain Medical Emergency Plan (MEP)" were reviewed and clarified immediately following the incident. The issue was again reviewed at the weekly Shift Supervisor's Staff Meeting held on February 10, 1988, and a proposed revision to the MEP was discussed.

The actions prescribed in the "Fort St. Vrain Medical Emergency Plan (MEP)," Issue 20 have been taken in every injury which has occurred since the October 26, 1987 incident.

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

The "Fort St. Vrain Medical Emergency Plan (MEP)" will be rewritten. The procedure will be revised to simplify and clarify the required actions to be taken in the case of injury to on-site personnel. The applicability of the procedure for contractor personnel will be well-defined. The new procedure will be better defined as to its applicability for the type of situations that may be encountered.

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

Full compliance will be achieved with the issuance of a revision to the "Fort St. Vrain Medical Emergency Plan (MEP)." The revisions will be issued by April 15, 1988.

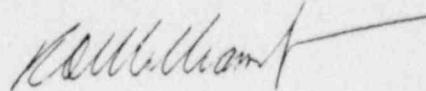
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Should you have any further questions, please contact
Mr. M. H. Holmes at (303) 480-6960.

Sincerely,



R. O. Williams, Jr.
Vice President, Nuclear Operations

ROW:DLW/skd

cc: Regional Administrator, Region IV
ATTN: Mr. T. F. Westerman, Chief
Projects Section B

Mr. Robert Farrell
Senior Resident Inspector
Fort St. Vrain