

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado
Fort St. Vrain Nuclear Generating Station

Docket No.: 50/267
License No.: DPR-34

During an NRC inspection conducted on October 21-25, 1985, violations of NRC requirements were identified. The violations involved procedural inadequacy and noncompliance, and maintenance replacement parts. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Maintenance Procedures

1. Station Battery Maintenance

- a. Technical Specification (TS) paragraph 5.6.2a requires that the temperature of cells adjacent to the pilot cell be measured every week.

Contrary to the above, the weekly battery surveillance test procedure SR 5.6.2a-W did not direct measurement of the temperatures of the cells adjacent to the pilot cell and there were no individual cell measurements taken or recorded.

- b. TS paragraph 5.6.2.b requires that the height of the electrolyte be measured every 3 months for every fifth cell.

Contrary to the above, neither the monthly nor quarterly surveillance test procedures SR 5.6.2b-M and SR 5.6.2b-Q provided a record of the sampled individual cell heights.

2. Station Battery Procedures

10 CFR 50, Appendix B, Criterion V, requires that activities affecting safety-related equipment be accomplished in accordance with procedures appropriate to the circumstances. This includes activities which are accepted industry practices and standards such as IEEE-450.

Contrary to the above, the licensee did not have a procedure to evaluate the need to equalize station batteries based on gravity drop nor were there procedures for periodic cleaning, inspecting, intercell connector maintenance and water addition.

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3. System Lineup Procedures

10 CFR 50, Appendix B, Criterion V, requires that activities affecting safety-related equipment be specified in and accomplished by procedures appropriate to the circumstances. The diesel generators are safety-related, and therefore, the valve lineups for them are a safety function.

Contrary to the above, diesel generator procedures did not include valve positions for the following valves which had to be positioned correctly for operation: cooling water temperature control valves, air valves on the temperature control valve regulators, lube oil drain valves, lube oil drain plugs and lube oil heater inlet and outlet valves.

This is a Severity Level IV violation (Supplement I)(50-267/8531-01).

B. Replacement Parts Procurement

10 CFR 50.54 requires licensees to implement a Quality Assurance (QA) plan. The Updated Final Safety Analysis Report (FSAR), Revision 3, Section B.5.4, which is part of the QA plan, requires that safety-related purchase requisitions include adequately defined technical requirements and include acceptance and rejection criteria. FSAR Section B.5.7.3 requires that examination be performed on delivered items to the extent necessary to determine that the requirements of the purchase orders are satisfied.

Contrary to the above, the licensee purchased and accepted for use safety-related O-rings without defining technical requirements or acceptance criteria.

This is a Severity Level IV violation (Supplement I)(50-267/8531-02).

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 the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 18th day of December, 1985.