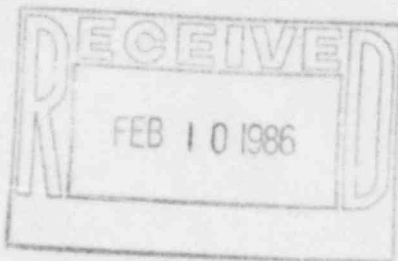




Public Service

16805 WCR 19 1/2, Platteville, Colorado 80651

**Public Service
Company of Colorado**



February 7, 1986
Fort St. Vrain
Unit No. 1
P-86096

Regional Administrator
Attn: J. E. Gagliardo
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Docket No. 50-267

SUBJECT: I&E Inspection Report 85-33

REFERENCE: NRC Letter, Gagliardo to
Lee, dated 01/08/86
(G-86018)

Dear Mr. Gagliardo:

This letter is in response to the Notice of Violation received as a result of inspections conducted at Fort St. Vrain during the period December 9-13, 1985. The following responses to the items contained in the Notice of Violation are hereby submitted:

A. Failure to Perform Safety Evaluation for Installed Temporary Gages

10 CFR Part 50.59 requires that a change made to the facility, as described in the safety analysis report, be evaluated to determine if the change involves an unreviewed safety question.

Contrary to the above, the licensee installed two uncalibrated temporary gages in plant systems without performing evaluations to determine if the changes involved an unreviewed safety question.

This is a Severity Level IV violation (Supplement I) (50-267/8533-1).

IC-020/86

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Q PDR

(1) The reason for the violation if admitted:

At the time these TCR's, 820427 and 820503, were written, Administrative Procedure P-1, titled "Plant Operations", required that a Standard Safety Evaluation Form be completed for temporary configurations, if Safety Related items were involved. Safety Evaluations were not completed because the electrical portion of the control loops involved with these gages were not identified as Safety Related. The pressure control valve and the pressure differential transmitter are classified Safety Related for pressure boundary purposes only. The fact that these gages could be used to verify compliance with Technical Specification Limiting Condition of Operation 4.2.7 was unintentionally omitted. The gages had been calibrated before their original installation but a record of this calibration had not been retained. A short time after the first TCR was written a change notice, CN-1510, was initiated to make this added indication permanent. Routine calibration would have started after completion of this CN.

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

Prior to this NRC Inspection steps were being taken to review all open TCR's and to complete Safety Evaluations. TCR 820427 was removed and TCR 820503 was rewritten and a Safety Evaluation was completed. On December 13, 1985, the gage was calibrated and also placed on the Master Calibration Schedule (MCS) to insure that routine calibrations are performed. The new TCR 851106, with the Safety Evaluation, was implemented on December 30, 1985.

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

Safety Evaluations will be performed on all open TCR's and any future TCR's.

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

March 31, 1986.

B. Failure to Review Design Change for Suitability

Technical Specifications, Section 7.4, require that written procedures be implemented for the conduct and control of safety-related activities.

Administrative Procedure Q-3, Issue 9, requires that materials selected for changes have been reviewed for suitability for intended applications.

Contrary to the above, the licensee had not reviewed the suitability of the oil used in safety-related Motor Operated Valve gearcases.

This is a Severity Level IV violation (Supplement I) (50-267/8533-02).

(1) The reason for the violation if admitted:

Administrative Procedure Q-4, Procurement Document Control, Issue 6, controls material procurement. Attachment Q-4B, FSV Quality Related (QR) Material Services, defined Lubricants, under Consumables in Part II, excluded Safety Related Items. Consequently, changes in lubricants were not reviewed for suitability for intended applications.

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

A General Services Action Request No. 979 was initiated to review the acceptability of Mobil 629 for use in Rotork valve operators. Subsequently, a Corrective Action Request No. 86-112 was initiated to review the suitability of Mobil 629 for all motor operated valves. These Action Requests were evaluated by Site Engineering personnel. The use of Mobil 629 was found to be an acceptable lubricant for all motor operated valves.

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

Due to the above stated violation, a permanent Procedure Deviation Request (PDR) to Administrative Procedure Q-4, will be implemented. This PDR will place Consumables in Part I, Q-4B, included items. As a result of the PDR, lubricants will require a Quality Related procurement review. Additionally a new Maintenance Administrative Procedure, MAP-20, allowable Consumables and Equivalents Control, is in review and approval. MAP-20 will control the use of Consumables and ensure that only approved Consumables, including Lubricants, are to be used, during Maintenance Activities.

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

Full compliance will be achieved by February 28, 1986.

Should you have any further questions, please contact Mr. Frank J. Novachek, (303) 571-7436, ext. 201.

Sincerely,

J. W. Gahm by [Signature]

J. W. Gahm
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

JWG/k1s