

APPENDIX A  
NOTICE OF VIOLATION

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

Docket: 50-267  
Operating License: DPR-34

During an NRC inspection conducted on July 25 through August 5, 1988, a violation of NRC requirements was identified. The violation involved failure to implement independent verification procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

Fort St. Vrain Nuclear Generating Station Technical Specification AC7.4.a requires that, "Written procedures shall be established, implemented, and maintained covering . . . 1. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972."

Procedure NPAP-4, Appendix NPAP-4A, "Surveillance Procedure Preparation," provides guidance concerning activities which require independent verification.

Contrary to the above, it was determined that Surveillance Procedures SR 5.2.15-M, SR 5.4.1.1.8.b-M, and SR 5.4.1.3.2.c-M failed to have independent verification steps.

This is a Severity Level IV violation. (Supplement I)(267/8814-01)

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 violation 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 *2nd* day of *September* 1988