

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 July 11 through August 5, 1988, violations of NRC requirements were identified. The violations involved: (1) failure to store records in the location identified in your procedures, (2) failure to obtain authorization for helium circulator installation, and (3) failure to appropriately control special processes.

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

A. Failure to Follow Procedures For Control of Records

Criterion XVII of Appendix B to 10 CFR Part 50 requires each licensee to establish requirements concerning record retention, such as duration, location, and assigned responsibility.

Administrative Procedures Manual (APM) Procedure Q-17, Issue 11, dated March 26, 1987, states in paragraph 4.5, Records Storage, "Records are stored in the Record Center building (see Attachment Q-17D) which meets the requirements of a records facility as described by ANSI N45.2.9."

Contrary to the above, it was determined that charts generated by control room recorders are not stored in the facility described in the above referenced procedure. Based on an interview with the supervisor of the Records Center, and confirmed by reference to the licensee's Record Retention Schedule, these particular lifetime records are retained on site for 1 to 2 years only. After that time, the records are sent to the Rocky Mountain Records Storage Center, a commercial facility, located in Denver, Colorado.

This is a Severity Level V violation. (Supplement I) (267/8815-01)

B. Helium Circulator Installation Without Appropriate Authorization

Criterion VIII of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established for the identification and control of materials, parts, and components, including partially fabricated assemblies These identification and control measures shall be designed to prevent the use of incorrect or defective material, parts, and components."

Paragraph 4.8 of APM Procedure Q-8, Issue 7, dated September 30, 1986, permits conditional release of items which have not been accepted by Quality Assurance (QA)/Quality Control (QC), provided that a conditional release request has been approved by the Nuclear Engineering

Division (NED) Site Engineering Manager/Designee and the QA Services Manager/Designee in accordance with Attachments Q-8A and Q-8B of the procedure.

Contrary to the above, S/N C-2101 helium circulator was installed (with an attached hold tag signifying QA/QC had not performed receipt inspection) without submitting a conditional release request for the approval of the NED Site Engineering Manager and the QA Services Manager.

This is a Severity Level IV violation. (Supplement I) (267/8815-03)

C. Failure to Control Special Processes

Criterion IX of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that special processes, including welding, nondestructive testing, . . . are controlled and accomplished . . . using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Paragraph 3.0 of APM Procedure Q-9, Issue 8, effective date December 1, 1986, states, in part, "Practices employed are required to assure that special processes are controlled and accomplished . . . using qualified procedures in accordance with applicable codes, standards, specifications, acceptance criteria or other special requirements."

Contrary to the above:

1. Steam inlet piping stud threads (Part No. FP-91-M-19-4-42) were fluorescent magnetic particle examined in one direction only, and not in the two directions required by paragraph 4.2.7 of Procedure QCIM-24, Issue 4, effective date September 22, 1987.
2. Repair welding of upper strut to scroll plate welds in the "B" Helium Circulator, S/N C-2105, was performed prior to qualification of the welding procedure specification.

This is a Severity Level IV violation. (Supplement I) (267/8815-06)

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, (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 13th day of September, 1988