

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado
Fort St. Vrain

Docket: 50-267/88-17
Operating License: DPR-34

During an NRC inspection conducted during July 24 through August 2, 1988, violations of NRC requirements were identified. The violations involved: (1) failure to follow procedures that affect quality, two examples, and (2) a failure to implement the requirements of 10 CFR Part 20 requirements, two examples. 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 Administrative Procedures

10 CFR Part 50, Appendix B, Criterion V requires, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . and shall be accomplished in accordance with these . . . procedures"

Licensee Support Services Manager's Administrative Procedure-1 and Fort St. Vrain Administrative Procedure G-7, both require, in part, that specific documentation be completed and signed by senior plant managers prior to certain specified plant positions being filled.

Contrary to the above, the NRC inspector determined on August 1, 1988, that the licensee, on or about June 25, 1988, had promoted an individual into the vacant position of Superintendent of Chemistry and Radiation without first completing the required documentation of SUSMAP-1 and G-7.

The licensee subsequently completed the required documentation on August 2, 1988, and implemented administrative controls to prevent a future recurrence of this violation. Due to the licensee's timely and effective corrective actions concerning this matter, it will not be necessary to respond to this violation.

This is considered a Severity Level V violation. (Supplement I)
(267/8817-01)

B. Failure To Follow Procedures

Licensee Health Physics Procedure HPP-16 requires, in part, that prior to use full face air purifying respirators be negatively pressure fit tested by the wearer to ensure air tightness at respirator sealing points.

Contrary to the above, the NRC inspector observed on July 26, 1988, two individuals improperly perform fit tests when donning full-face air purifying respiratory protection equipment prior to entering an airborne radioactivity area.

This is considered a Severity Level IV violation. (Supplement IV)
(267/8817-04)

C. Respiratory Protection 20.103

10 CFR Part 20.103(c) requires, in part, "When respiratory protective equipment is used to limit the inhalation of airborne radioactive material The licensee may make allowance for this use of respiratory protective equipment in estimating exposures of individuals to this material provide that: The licensee maintains and implements a respiratory protection program that includes, fitting, . . . and testing of respiratory for operability immediately prior to each use; written procedures regarding supervision and training of personnel."

Licensee HPP 16 defines the licensee's available respiratory protection equipment, selection criteria, preuse testing, available protection factors, and equipment limitations. Also, licensee training lesson plan GE 018.03 defines the licensee presentation for respiratory protection training.

Contrary to the above, the NRC inspector determined on July 28, 1988, during the presentation of respiratory protection training that instructions on both radiological and industrial applications of respiratory protection equipment were inadequate regarding fitting and testing for operability immediately prior to each use, and that HPP-16 did not implement adequate use instructions on all available respiratory protection equipment.

This is considered a Severity Level IV violation. (Supplement IV)
(267/8817-02)

D. Radiation Area Posting 20.203

10 CFR Part 20.203 requires, in part, "Each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: Caution Radiation Area."

10 CFR Part 202(b)(2) defines "Radiation Area," in part, ". . . as any area accessible to personnel, in which there exists radiation . . . at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirem, or in any 5 consecutive days a dose in excess of 100 millirem;" This requirement is for protection of personnel entering a 10 CFR Part 20.5 "Restricted Area," and is considered to encompass a normal 40-hour, 5-day work week.

posting only if general area radiation levels exceeded 2.5 millirem per hour, and that some licensee personnel were working a mandatory 6-day work week, with 9 1/2-hour work days. The combination of radiation levels and the 47.5 hours in a 5-day period would cause an individual to exceed the 100 millirem limitation.

This is considered a Severity Level IV violation. (Supplement IV)
(267/8817-03)

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 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 21st day of September 1988.