

APPENDIX A
NOTICE OF VIOLATION

Public Service Company of Colorado (PSCo) Docket: 50-267
Fort St. Vrain Nuclear Generating Station Operating License: DPR-34

During an NRC inspection conducted on April 25-29, 1988, two violations of NRC requirements were identified. The violations involved inadequate training of personnel assigned to the emergency response organization and failure to notify the state in the required time. 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. Inadequate Training of Personnel

10 CFR 50.54(q) requires that a licensee shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements of 10 CFR 50, Appendix E, to provide reasonable assurance that adequate protective measures can and will be taken in the event of an emergency.

10 CFR 50.47(b)(15) requires that radiological emergency response training be provided to those who may be called on to assist in an emergency.

Section 12.2.4 of the Fort St. Vrain Final Safety Analysis Report "Emergency Training" states that all personnel are trained to familiarize them with those actions to be taken in case of emergencies. Periodic drills are held in accordance with written procedures. Training to carry out the requirements of the Radiological Emergency Response Plan is carried out on several levels. Those persons who have specific assignments and duties to perform during such an emergency are given specific classroom training in those duties and how they relate to the overall plan. Drills are then conducted to provide realistic conditions for on-the-job training. Those drills may vary from a simulated minor incident involving a few people to a simulated major event involving the entire plant site. When drills are conducted in conjunction with local, state, and federal agencies, PSCo personnel who participate include plant staff, corporate support personnel, corporate management, and executive personnel and consultants.

Personnel required to complete the annual training and retraining program for the Emergency Directors are manager-nuclear production, station manager, support services manager, superintendent-operations, licensed equipment operators, shift supervisors, senior reactor operators, reactor operators, superintendent-training, and scheduling/stores coordinator.

This training covers dose estimation, effects of meteorological conditions, emergency procedures for backshift incidents, interface

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actions with offsite agencies, availability of offsite resources and support, evacuation and personnel accountability, transportation of injured and contaminated personnel, first-aid training and retraining, and training in job-specific tasks and procedures.

Contrary to the above, certain procedures and emergency training were determined to be ineffective, in that during interviews performed during the period April 25-29, 1988, five teams, each consisting of a shift supervisor and at least one licensed operator (one team had two persons; the other teams had four) exhibited the following weaknesses:

- . Four of the five teams were unable to classify accurately and efficiently an accident scenario which resulted in an alert condition.
- . All teams failed to exhibit positive command and control of resources and activities.
- . One team elected to insert reserve shutdown reactivity locally in response to a scram without shutdown due to rods stuck out. The reactor was allowed to operate for approximately 22 minutes without primary and secondary flow.
- . One team failed to calculate and classify as a general emergency a stack effluent release rate resulting in greater than 1 R/hr dose rate at the Exclusion Area Boundary.
- . None of the five teams demonstrated an understanding of process radiation monitor readings in counts per minute (cpm), instrument sensitivity in microcuries per cc per cpm, and the mathematical manipulation required to obtain release concentration and release rate.

This is a violation of NRC regulatory requirements 10 CFR 50.54(q) and 50.47(b).

This is a Severity Level IV violation. (Supplement VIII)(267/8811-01)

B. Failure To Notify State In Required Time

10 CFR 50.54(q) requires that a licensee follow and maintain in effect emergency plans which meet the requirements of 10 CFR 50, Appendix E, to provide reasonable assurance that adequate protective measures can and will be taken in the event of an emergency. 10 CFR 50, Appendix E IV D.3. states, "A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency."

Contrary to the above, on April 4, 1988, at 2:21 p.m., following a reactor manual scram from 72 percent power due to power grid frequency, emergency

response personnel did not notify the state until 25 minutes after declaring an emergency.

This is a Severity Level IV violation. (Supplement VIII)(267/8811-02)

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 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 June 1988.