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R.O. WILLIAMS, JR.  
VICE PRESIDENT  
NUCLEAR OPERATIONS

June 10, 1988  
Fort St. Vrain  
Unit No. 1  
P-88204

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Docket No. 50-267

SUBJECT: Confirmation of Action  
Letter 88-07

REFERENCE: NRC Letter, Martin to  
Williams, dated April  
29, 1988 (G-88142)

Gentlemen:

This letter is in response to the Confirmation of Action Letter received as a result of the conversation between Mr. L. J. Callan of the Region IV office, and Messrs. Holmes and Fuller of my staff on April 29, 1988. The conversation was related to the Emergency Preparedness inspection at Fort St. Vrain (Inspection 88-11). Actions have been taken to correct the apparent training deficiencies identified during that inspection. Completion of the activities noted in the Confirmation of Action Letter is hereby documented as follows:

Item a. in CAL 88-07

Prior to the end of the next scheduled watch of the crew tested at 1 p.m., April 27, 1988, they will be trained and tested to demonstrate their capability to utilize the data logger programs for offsite dose projection. Refresher training will also be provided to the other crews as soon as reasonably practical, but no later than May 31, 1988.

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PSC Response

Public Service Company of Colorado had a different understanding of the required action for the first part of the commitment noted above. PSC understood from the April 29 phone conversation with Mr. Callan that one individual from the noted crew would be trained and tested, as required, prior to his next scheduled watch. I verified this understanding during a subsequent phone conversation between myself and Mr. L. J. Callan of the Region IV office on May 2, 1988.

The first part of this commitment was met by a one-on-one training and testing session between the individual noted and the Fort St. Vrain Nuclear Training Manager. Note that the Nuclear Training Manager also served as the Radiation Protection Manager of the plant at that time. The one-on-one session consisted of a seminar presentation of the techniques required to perform a monitored and unmonitored dose calculation on the plant data logger. The session culminated with the successful completion, by the individual, of a formal Job Performance Measure (JPM) for the task of performing a Radiological Emergency Response Plan dose calculation. The individual thus demonstrated his ability to utilize the data logger programs for offsite dose projection. This action was completed on April 29, 1988 which was prior to the next scheduled watch for the noted individual.

The remainder of the crew tested at 1 p.m., April 27, 1988 received equivalent training as soon as the Confirmation of Action Letter was received. The training involved a seminar overview of the techniques required to perform a monitored and unmonitored dose calculation on the plant data logger. The seminar was presented by the Nuclear Training Manager on May 21, 1988. Additionally, each member of the crew completed a formal Job Performance Measure for the task of performing a Radiological Emergency Response Plan dose calculation. This activity was conducted by the Nuclear Training Manager and was completed on May 31, 1988.

The second part of this commitment was met by providing refresher training on this topic to all other operating crews. This training was also in the form of seminar presentations of the techniques required to perform dose assessment on the plant data logger followed by formal Job Performance Measures for each operator. Refresher training and testing for all licensed operators conducted by the Nuclear Training Manager was completed on May 31, 1988.

Item b. in CAL 88-07

Prior to the end of the next scheduled training opportunity for each shift (approximately June 10, 1988), training will be conducted, and the crews will be tested for their ability to classify events, especially those events not currently specifically included in the training program.

PSC Response

Immediate on-shift training seminars were presented to each operating crew. "Emergency Event Classification" seminars were conducted by the Nuclear Training Manager of Fort St. Vrain. Training included the Fort St. Vrain management philosophy with respect to classification and mitigation of emergency events, a review of emergency action levels (EAL's) in the procedures and operator aides, a review of changes to the requirements for a notification of unusual event (NOUE), a discussion of the role of the Emergency Coordinator, and an update of the changes made to the Operating Procedures which address stuck control rods and slack cable lights. This training was completed on April 30, 1988.

Additional formal classroom training, for each operator shift, was conducted. The crews were also tested for their ability to classify events. "Event and Emergency Classification Overview" training was presented in accordance with a formalized Fort St. Vrain Training Department lesson plan (SO 131.00). The "Event and Emergency Classification Overview" lesson plan was a new lesson plan developed in response to the issues raised during the Emergency Preparedness inspection. The lesson plan covered all events, including those events not previously included in the training program. The lesson plan also covered recent changes, made to the Fort St. Vrain Emergency Procedures, which were initiated in response to other issues raised during the inspection.

An examination was administered to each operator following classroom training. Operators were tested for their ability to classify events in each event category. Training and testing for all crews was completed on May 27, 1988.

Item c. in CAL 88-07

Within one week modify existing procedures, relating to emergency actions to be followed in the event of a failure of the reactor to be shut down by control rod insertion, to eliminate identified procedural deficiencies.

PSC Response

Two Emergency Procedures were revised in response to this issue. Procedure Deviation Report (PDR) 88-0298 was initiated to revise Emergency Procedure EP E, "Abnormal Reactor Power Change." A new step was added to EP E to provide instructions for the reactor operators to actuate the station reserve shutdown system in the event of a failure of the reactor to be shut down by control rod insertion. PDR 88-0312 was initiated to revise Emergency Procedure EP B-1, "Reactor Scram." New steps were added to EP B-1 to provide instructions for insertion of reserve shutdown material if the ability to place the reactor in a subcritical condition by scram of the control rods is lost.

PDR 88-0298 was reviewed by the Plant Operations Review Committee on April 28, 1988. The change was effective immediately. PDR 88-0312 was reviewed by the Plant Operations Review Committee on May 4, 1988. The change was effective immediately.

Item d. in CAL 88-07

Following completion of the above activities, you will document your actions taken in a, b, and c above to us.

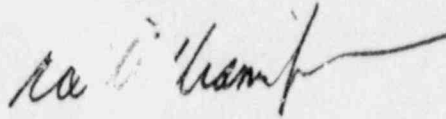
PSC Response

The completion of the activities noted above are hereby formally documented. Copies of appropriate Lesson Plans, Seminar Plans, Job Performance Measures, Examinations, Attendance Logs, Procedure Deviation Reports and revised procedures are maintained in the site Records Storage Facility.

June 10, 1988

Should you have any further questions, please contact Mr. M. H. Holmes at (303) 480-6960.

Sincerely,



R. C. Williams, Jr.  
Vice President,  
Nuclear Operations

ROW:DLW/djc

cc: Regional Administrator, Region IV  
ATTN: Mr. T. F. Westerman, Chief  
Projects Section B

Mr. Robert Farrell  
Senior Resident Inspector  
Fort St. Vrain