



Public Service
Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

October 10, 1988
Fort St. Vrain
Unit No. 1
P-88358

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

Docket No. 50-267

SUBJECT: NRC Inspection
Report 88-14

REFERENCE: See Attachment A

Dear Sirs:

This letter is in response to the Notice of Violation and Notice of Deviation (Reference 2) received as a result of a special inspection conducted by Region IV personnel during the period of July 25 through August 5, 1988. By phone on October 5, 1988, Mr. T. F. Westerman agreed that the response to this inspection could be delayed until October 10, 1988. The following response to the item contained in the Notice of Violation is hereby submitted:

Failure to Implement Independent Verification

Fort St. Vrain Nuclear Generating Station Technical Specification AC 7.4.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)

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(1) The Reason For The Violation If Admitted:

Public Service Company of Colorado (PSC) admits that at the time of this inspection and at the present time not all Fort St. Vrain surveillance procedures have been revised to include independent verification activities. However, PSC does not admit the specific violation noted in inspection report 88-14. The violation was identified as a followup to an NRC inspection report open item, 267/8709-01. Open item 267/8709-01 had been identified in NRC letter, Gagliardo to Williams dated May 6, 1987 (Reference 4). A copy of the discussion of the open item from that letter is included with this response as Attachment B.

PSC established an internal commitment, CL-1744, in June of 1987 in response to open item 267/8709-01. CL-1744 committed PSC to add independent verification provisions to surveillance procedures in accordance with two Nuclear Production Administrative Procedures (NPAP's).

Guidance for the inclusion of independent verification activities into surveillance procedures was contained in NPAP-4, "Surveillance Procedure Preparation." NPAP-4 includes an applicability statement which states, in part, that, "this procedure applies to all procedures as they are rewritten by the surveillance rewrite program."

The necessary revision of existing surveillance procedures was to be accomplished by the surveillance rewrite program in accordance with the schedule for periodic annual or biennial procedure reviews specified in NPAP-8, "Procedure Reviews." NPAP-8 specifies annual reviews for procedures that are either Equipment Qualification (EQ) related or reactor protection system related. Reviews for other surveillance procedures are required on a biennial basis. Based on the date of the commitment and the schedule established by NPAP-8, a review of all surveillance procedures relative to the commitment would be completed by June, 1989.

SR 5.2.15-M

Information provided to the NRC inspectors during this inspection erroneously indicated that SR 5.2.15-M was last reviewed on November 1, 1985. PSC has determined that SR 5.2.15-M received a formal review on September 22, 1986. This review was documented by PSC internal memo PPC-86-4039. The September 22, 1986 review was accomplished prior to the commitment date established for CL-1744. Provisions for independent verification were not required at that time and were not added. Consequently, the issue of SR 5.2.15-M (Issue 27) reviewed during inspection 88-14 did not contain independent verification and NPAP-4 did not apply. SR 5.2.15-M, which has a biennial review cycle, had been redrafted as a part of the station's surveillance rewrite program and was in the review/approval cycle at the time of this inspection. The revision, which included the addition of independent verification steps, was issued effective August 8, 1988 (Issue 28). To satisfy CL-1744, independent verification would not have had to be added to SR 5.2.15-M until the September, 1988 review.

SR 5.4.1.1.8b-M

The issue of SR 5.4.1.1.8b-M reviewed by the inspectors had been updated per the surveillance rewrite program and, therefore, NPAP-4 does apply. SR 5.4.1.1.8b-M requires the installation of jumpers for the purpose of testing certain instrumentation modules. The procedure includes a functional test which is performed following the removal of jumpers installed for testing. The functional test verifies proper operation of the affected modules and that all jumpers have been removed. The use of a functional test to accomplish independent verification activities meets the requirement of Section 3.2 of NPAP-4, Attachment NPAP-4A. It also meets the regulatory guidance of NUREG-0737, I.C.6, page 3-50, item 5, which states that:

"For the return-to-service of equipment important-to-safety, a second qualified operator should verify proper system alignment unless functional testing can be performed without compromising plant safety, and can prove that all equipment, valves, and switches involved in the activity are correctly aligned."

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SR 5.4.1.3.2.c-M

An annual review of SR 5.4.1.3.2.c-M is required by NPAP-8. Information provided to the inspectors during this inspection indicated that SR 5.4.1.3.2.c-M was last reviewed during June, 1987. This review was performed virtually at the same time that CL-1744 was established. The June, 1987 review did not trigger implementation of the surveillance rewrite program for SR 5.4.1.3.2.c-M and NPAP-4 did not apply to the procedure issue reviewed by the inspectors. PSC has determined that SR 5.4.1.3.2.c-M received a formal review during the month of June, 1988. This review was documented by PSC internal memo PPC-88-1402. The review identified the need to revise SR 5.4.1.3.2.c-M. This revision to SR 5.4.1.3.2.c-M is currently in the review/approval cycle at Fort St. Vrain.

(2) The Corrective Steps Which Have Been Taken And The Results Achieved:

Even though the specific violation is not admitted, actions have been taken to improve the program for establishing, implementing, and maintaining surveillance procedures at Fort St. Vrain. The entire schedule for procedure reviews has been reassessed. Two additional corrections to procedure review dates were necessary. Attachment NPAP-4A to NPAP-4 was revised effective July 25, 1988. This revision clarifies the use of functional testing for independent verification. Requirements for verifier initials were also clarified.

In addition, a method for periodically confirming the accuracy of the scheduled review dates has been implemented.

(3) The Corrective Steps Which Will Be Taken To Avoid Further Violations:

PSC will continue with the surveillance rewrite program as established at Fort St. Vrain. To date, approximately 70% of the station's surveillance procedures have been revised, as necessary, under this program. The remaining procedures will be subject to review in accordance with the schedule established in NPAP-8. A rewrite of those surveillances will be initiated. The rewrite effort will incorporate the requirements of NPAP-4, including the addition of independent verification activities, as necessary.

(4) The Date When Full Compliance Will Be Achieved:

Full compliance will be achieved when remaining surveillance procedures have received a regularly scheduled review and rewrites have been initiated as found to be necessary. A review of all surveillance procedures, relative to CL-1744 will be completed by June, 1989.

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PSC regrets that complete and up to date information was not provided to the inspection team at the time of inspection 88-14. Corrective actions taken relative to the on going maintenance of Fort St. Vrain's procedure review schedule should serve to eliminate this specific problem in the future.

In summary PSC would like to reassert that a systematic approach to providing for the inclusion of independent verification activities in surveillance procedures has been established. The program is being managed and monitored so that it will be completed in accordance with a defined schedule.

The following response to the item contained in the Notice of Deviation is hereby submitted:

Notice of Deviation

Based on the results of an NRC inspection conducted on July 25 through August 5, 1988, a deviation of your commitments was identified. The deviation consisted of failure to notify the NRC of a decision not to meet a commitment made in response to a prior deviation. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the deviation is listed below:

The licensee, in a response dated September 10, 1985, to deviation 267/8516-01 (7-85310), committed to begin "... design of a new, larger records storage center for Fort St. Vrain in March of 1985. The New Records Storage Center will be housed in a building separate from the present records storage building, and connected to the present building only by an enclosed walkway between the two buildings. The new building will be used solely for records storage and the present building will be used as an office building with no records being permanently within it.

"In order to ensure that the new records storage center will meet the NRC requirements, ... a letter will be sent to the NRC . . . Once we have received NRC approval . . . we will proceed with ordering material and begin construction of the new building at the earliest reasonable time."

Contrary to the above, the licensee, in October 1986, indefinitely postponed construction of the new records storage facility and failed to inform the NRC of this change in a commitment. (267/8814-02)

(1) The Reason For The Deviation If Admitted:

The deviation is admitted.

A letter advising the NRC of the decision not to construct the Records Center was drafted in March, 1988, but through oversight was not finalized and submitted to the NRC.

(2) The Corrective Steps Which Have Been Taken And The Results Achieved:

On August 18, 1988, PSC submitted a letter to the NRC (P-88302) confirming that PSC was no longer planning to construct a new Records Storage Facility. Additionally, PSC proposed a resolution to the question originally raised by the NRC concerning the fire door rating of the Records Center (identified in NRC Inspection 85-16, G-85327).

On September 20, 1988, PSC received from the NRC acceptance of our proposal related to the fire door rating (NRC Letter, Heitner to Williams, dated September 2, 1988, G-88370). Based on the letter, the NRC considers this issue (TAC 61578) closed.

On October 4, 1988, at the PSC Senior Planning Team meeting it was emphasized to Fort St. Vrain managers that statements provided by PSC to the NRC in written submittals constitute commitments. Deviations to these commitments, although justified, will require that PSC advise the NRC of changes or deviations.

(3) The Corrective Steps Which Will Be Taken To Avoid Further Deviations:

PSC will review its commitment tracking system to identify any other commitments to the NRC which may need updating. PSC will report the results of this review to the NRC. This report will include any additional action items that PSC has determined to be needed.

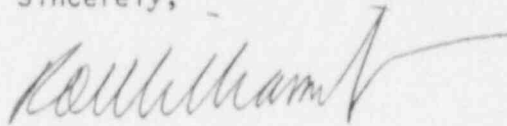
(4) The Date When Full Compliance Will Be Achieved:

With the submittal of letter P-88302 on August 18, 1988, PSC action related to the specific deviation was complete. The report described in item (3) above will be submitted by October 28, 1988.

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

Sincerely, -

A handwritten signature in cursive script, appearing to read "R. O. Williams, Jr.", with a long horizontal flourish extending to the right.

R. O. Williams, Jr.
Senior Vice President,
Nuclear Operations

ROW:DLW/djc

Attachment

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

Mr. Robert Farrell
Senior Resident Inspector
Fort St. Vrain

Attachment A to
P-88358
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REFERENCES

- 1) NRC Letter, Heitner
to Williams, dated
September 2, 1988
(G-88370)
- 2) NRC Letter, Callan
to Williams, dated
September 2, 1988
(G-88363)
- 3) PSC Letter, Williams
to Document Control
Desk, dated August 18,
1988 (P-88302)
- 4) NRC Letter, Gagliardo
to Williams, dated
May 6, 1987 (G-87160)
- 5) PSC Letter, Warembourg
to Johnson, dated
September 10, 1985
(P-85310)
- 6) NRC Letter Johnson to
Lee, dated August 13,
1985 (G-85327)

Attachment B to
P-88358
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Excerpt from NRC Inspection Report 87-09
NRC Letter, Gagliardo to Williams, dated May 6, 1987 (G-87160)

During the loss of offsite power test, a wire is lifted in the diesel generator load sequence cabinet to assure that the train to be tested is loaded first with the larger loads. Normally this cabinet logic selects the first diesel generator set to come to speed as the one receiving the first loads. There was a step in the test procedure to restore the lifted lead following completion of the test. There was, however, no requirement for independent verification of the wire retermination. The plant has successfully completed its independent verification requirement according to NUREG-0737 and is not committed to the 1976 version of ANSI N18.7, which requires independent verification in instances such as this. The plant is, however, in the process of adding independent verification requirements to surveillance procedures, system lineup procedures, and clearance procedures. The lack of independent verification in this case was considered a bad practice and identified as such by the NRC inspectors. Plant management agreed and immediately added an independent verification requirement in this case. Other surveillance procedures are being reviewed by the licensee, and independent verifications are being added as cases are identified that require such verification. This is considered to be an open item pending followup by the NRC inspectors (267/8709-01).