

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado
Fort St. Vrain Nuclear Generating Station

Docket: 50-267/86-22
License: DPR-34

During an NRC inspection conducted on August 4-8, 1986, one violation of NRC requirements was identified. The violation involved failure to correct previously identified emergency preparedness deficiencies. In accordance with the "General Statement of Policy and Procedure of NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Failure to Correct Deficiencies

10 CFR 50.54(q) requires that licensees shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to Part 50.

10 CFR 50.47(b)(14) and Section IV.F of Appendix E to Part 50 require, in part, that periodic exercises are conducted to evaluate major portions of the licensee's emergency response capabilities and that deficiencies identified as a result of exercises or drills will be corrected.

Contrary to the above, on August 5 and 6, 1986, during the 1986 annual exercise, the NRC inspectors determined that several emergency preparedness deficiencies identified during the previous annual exercise conducted on June 19, 1985, were not fully and adequately corrected in accordance with NRC requirements as evidenced by the following:

- A. During the 1985 exercise, internal inconsistencies and lack of completeness in scenario data and instructions for players and controllers resulted in a failure to fully demonstrate some exercise objectives. During the 1986 exercise, NRC inspectors identified scenario inconsistencies which impacted the demonstration of emergency classification and dose assessment, indicating that this deficiency had not been fully corrected.
- B. Controller actions in the control room during the 1985 exercise were found to be deficient in allowing player to depart from the exercise scenario. During the 1986 exercise, this deficiency was found not to have been fully corrected, in that weak controller action in the control room failed to correct scenario weaknesses and impacted the demonstration of emergency classification in the early stages of the exercise.
- C. During the 1985 exercise, a deficiency in the training of rescue personnel for first aid and personnel decontamination was identified. The NRC inspectors observed a similar lack of attention to first aid and personnel decontamination considerations during the 1986 exercise, indicating a failure to correct this deficiency.

- D. During the 1985 exercise, the licensee was deficient in fully demonstrating coordination of radiological and environmental assessment, development of protective action recommendations, and management of the utility forward command post (emergency operations facility) activities. The NRC inspectors observed similar weaknesses in managing the licensee's emergency response activities and formulating protective action recommendations during the 1986 exercise, indicating that the deficiency had not been fully corrected.

- E. Following the 1985 exercise, during the post exercise critique, the licensee reported a deficiency in which the control room director preempted the corporate emergency director's decisionmaking responsibility by making an emergency declaration. During the 1986 exercise, the NRC inspectors observed the technical support center director declare a General Emergency and provide protective action recommendations although it was the CED's responsibility to perform these functions. This indicates a failure to correct this deficiency.

This is a Severity Level IV violation. (Supplement VIII) (267/8622-01)

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 24th day of September, 1986