



Public Service™

December 14, 1987
Fort St. Vrain
Unit No. 1
P-87434

**Public Service
Company of Colorado**
P.O. Box 640
Denver, CO 80201-0840

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

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

Docket No. 50-267

SUBJECT: RESPONSE TO INSPECTION 87-28,
NOTICE OF DEVIATION

REFERENCE: (1) NRC LETTER, CALLAN TO
WILLIAMS, DATED
11/12/87 (G-87400)

(2) PSC LETTER, WILLIAMS TO
MARTIN, DATED 08/29/86
(P-86535)

Gentlemen:

Public Service Company of Colorado (PSC) is hereby submitting written statements and explanations in response to the Notice of Deviation (Appendix A of Reference (1)) and presented in Inspection 87-28. If you have any questions or concerns pertaining to the information contained within the attachment to this letter, please contact Mr. M. H. Holmes at (303) 480-6960.

Sincerely,

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

ROW/ojc

cc: Regional Administrator, Region IV
ATTN: Mr. T.F. Westerman, Chief
Project Branch B
(2 copies)

Mr. Robert E. Farrell
Senior Resident Inspector
Fort St. Vrain

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NOTICE OF DEVIATION

NRC Inspection 87-28

Failure to Staff the Forward Command Post Within Time Commitment

Paragraph 6.1 of the Fort St. Vrain Radiological Emergency Response Plan (RERP) states, in part, "For ALERT . . . level accidents, onsite and offsite emergency response facilities will, in all cases, be manned and activated." The minimum staffing for onsite and offsite emergency response facilities outside of the control room are specified in RERP Implementing Procedures RERP-TSC, RERP-PCC, and RERP-FCP. The licensee's correspondence providing staffing and augmentation commitments to the NRC, dated August 28, 1980, and April 8 and December 7, 1981, state that the staffing of emergency response facilities to meet the goals and criteria of Table B-1 of NUREG-0654 (also Table 2 of Supplement No. 1 to NUREG-0737) will be accomplished in 90 minutes.

In deviation from the above, on October 8, 1987, an NRC inspector determined from interviews and licensee maintained records and logs that the Personnel Control Center (operational support center) and Forward Command Post (emergency operations facility) had not been staffed and activated in accordance with the licensee's RERP and procedures in 90 minutes following the declaration of an Alert classification on October 3, 1987. (267/8728-01)

PSC RESPONSE TO NOTICE OF DEVIATION

NRC Inspection 87-28

1. The reason for the deviation, if admitted.

Due to several key factors which led to the inability to contact all qualified members of the emergency organization, the Personnel Control Center (PCC) and Forward Command Post (FCP) were not fully staffed and activated within the required 90 minutes following the declaration of an Alert. These key factors have been recognized to be the following:

- a. Fire damage to the onsite telecommunications system caused a thirteen minute delay following the classification to initiate the emergency paging system.
- b. Fire damage to the onsite telecommunications system resulted in no method being available to determine the paging response of the emergency organization, via the emergency call-back system.
- c. Several key members of the emergency organization either did not have the paging device located nearby, their paging device was inoperable, or their paging device was not heard.
- d. Several key staffing positions have limited depth in qualified personnel posing a potential for not being able to meet the minimum staffing requirements if all personnel are not contacted.

2. The corrective steps that have been taken and the results achieved.

- a. PSC Telecommunications Division has researched and purchased a higher grade telecommunications cable which replaced the cable onsite destroyed by fire. This new cable can withstand more severe temperatures and environmental conditions. This upgraded replacement will help reduce the possibility of a reoccurrence of this communication system failure. This cable was replaced on December 12, 1987.

- b. Several potential modifications to the emergency call-back system are in the process of being analyzed for cost benefit. These modifications could include addition of more incoming lines to the rotary receiving system, dedicated links from Denver to the Fort St. Vrain site, reprogramming of the conversion program to identify who has not responded to the page rather than the current program which identifies who has responded, and dedicated location and assignment of duties to the call-back system to include manual call out capabilities.
- c. All members of the emergency organization who carry the paging devices were reminded via a corporate memo about the importance of keeping the devices operational and keeping them within hearing distance at all possible times. PSC Telecommunications Division personnel are determining if a modification can be made to transmit multiple signals of an emergency page, thus increasing the possibility of all pager wearers to hear any emergency page.
- d. All senior nuclear management personnel are identifying additional personnel whom they feel could qualify in various RERP positions to increase the depth in the emergency organization. Those selected will be trained in accordance with FSV procedures. To date, several selections have been completed and requests for training initiated.

3. The corrective steps that will be taken to avoid further deviations.

- a. The emergency call-back system will be evaluated and upgraded. The onsite Security Force will be used to assist in identifying those individuals who have not responded to an emergency page and initiate manual call-outs.
- b. The emergency staffing levels will be increased to a minimum of three qualified individuals in each key position within the critical emergency response facilities, including the Control Room (CR), Technical Support Center (TSC), Personnel Control Center (PCC), and the Forward Command Post (FCP). This increase requires selection, training, and final qualification of various personnel within the PSC organization.
- c. As previously identified in the PSC letter to the NRC, dated 08/29/86 (Reference 2), on page 18 of Attachment A, PSC will implement a surveillance system to routinely test the emergency paging system and associated call-back system once the systems are fully implemented. This process will involve production of a surveillance test procedure, reviews, approvals, and final implementation.

4. Date when full compliance will be achieved.

- a. The revisions to, installation and testing of, and appropriate training of the emergency call-back system will be completed by June 1, 1988.
- b. The training of additional personnel to achieve a three deep minimum at the critical emergency response facilities will be completed by June 1, 1988.
- c. The implementation of a surveillance test to routinely test the effectiveness of the emergency paging and call-back systems will be completed by June 30, 1988.