PUBLIC SERVICE COMPANY OF COLORADO
P. O. BOX 840 · DENVER, COLORADO 80201

OSCAR R. LEE
VICE PRESIDENT

October 22, 1981
Fort St. Vrain
Unit #1
P-81260

Mr. Karl V. Seyfrit, Director
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

SUBJECT: I&E Inspection Report 81-18

Dear Mr. Seyfrit:

This letter is in response to the Notice of Violation received as a result of inspections conducted at this facility during the period August 1 to August 31, 1981. The specific items found in violation and responses are as follows:

1. Technical Specification 7.4.a, "Procedures, Administrative Controls," states in part that ". . . written procedures shall be established, implemented, and maintained . . ."

   A. Procedure P-1 "Plant Operations," Section 4.4, "Station Logs," states in part as follows:

      "4.4.1 A Station Log is maintained for each day with all entries made on a 24 hour clock basis. The Log assures communication of information necessary to maintain continuity between shift changes of operating personnel. The Station Log serves as the official record of plant operations and conditions. It consists of: . . .

      "a. (2) A logged Chronological listing by the On-Duty Supervisor of significant changes in the Plant, status, problems, or items of interest, or any tests, or non-routine operations in progress.

      "b. The Operator's Log in which the appropriate operators document: . . .

      "(2) A logged chronological listings and description of events occurring during the shift that may be of concern to operating and supervision personnel; including: . . .

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iii) Any Plant condition that could possibly affect compliance with Technical Specifications. The Shift Supervisor must be notified of any such conditions."

Contrary to the above, on August 26, 1981, no entries were made in either the Shift Supervisor's Log or any of the Operator's Logs regarding the fire, or the results of the fire which occurred under Cable Tray 322M in the Reactor Building at approximately 2:00 p.m. (MDT).

B. Procedure P-1 "Plant Operations," Section 4.4, "Station Logs," states in part as follows:

"4.4.1 A Station Log is maintained for each day with all entries made on a 24 hour clock basis. The Log assures entries made on a 24 hour clock basis. The Log assures communication of information necessary to maintain continuity between shift changes of operating personnel. The Station Log serves as the official record of plant operations and conditions. It consists of: . . .

"b. The Operator's Log in which the appropriate operators document: . . .

"ii) Clearances issued affecting equipment for which operator is responsible together with a brief description of equipment/devices and notation if safety-related. Returned clearances are logged by the affected operator."

Contrary to the above, on August 31, 1981, the NRC inspector determined that entry of clearance #1859, which required isolation of a main steam relief valve, had not been made in the Operator's Log.

This is a severity Level V Violation.

RESPONSE:

(1) The corrective steps which have been taken to avoid further violations:

Personnel involved and responsible for making log entries in accordance with procedure P-1, namely shift supervisors and reactor operators, have been re-instructed in the necessity and importance of making proper log entries to assure communications of information necessary to maintain continuity between shift changes. Compliance concerning the above violation was achieved at 12:10 a.m. on August 27, 1981.

(2) Corrective steps which will be taken to avoid further violations:

All personnel involved and responsible for keeping logs in accordance with procedure P-1 have received instruction via the review of procedure P-1 to avoid further violations.

(3) The date when full compliance will be achieved:

Full compliance specifically addressing the violation was achieved at 12:10 a.m. on August 27, 1981. Compliance regarding action to avoid further violations was achieved September 7, 1981.

2. Technical Specification 7.4.a, "Procedures, Administrative Controls," states in part that ". . . written procedures shall be established, implemented, and maintained . . ."

Procedure OPOP (Intro) (Issue 47, February 25, 1981), "Overall Plant Operating Procedure Introduction," Paragraph I, states in part that ". . .Section B of the Procedure contains checklists to determine the operability of various plant systems. The completion of these checklists shall be in accordance with the following . . . Except for the Sealed Valves Checklist, which must be completed. . ."

Procedure OPOP III (Issue 50, May 8, 1981), "Preparation for Increasing Reactor Power 2%,"; Section D. states in part that ". . .Verify check-off lists per OPOP I.B are complete. . ."

Contrary to the above, on August 31, 1981, at 2:00 p.m., MDT, with reactor power at 6%, the NRC inspector determined visually that V-22184, "Loop I Main Steam Electromatic Relief Valve Shutoff Valve" was not sealed. A check of the Sealed Valves Checklist for Startup No. 81-05 dated August 26, 1981, indicated that verification of V-22184 in the "sealed" open position had not occurred.

This is a Severity Level V Violation.

RESPONSE:

(1) The corrective steps which have been taken and the results achieved:

Immediately upon notification by the NRC inspector of the condition of V-22184, it was sealed providing compliance with the requirements of OPOP III at 2:15 p.m. August 31, 1981.

(2) Corrective steps which will be taken to avoid further violations:

Operations personnel were instructed to insure compliance with the requirements of OPOP III to avoid further violations.

(3) The date when full compliance will be achieved:

Compliance specifically addressing the violation was achieved at 2:15 p.m. August 31, 1981. Compliance regarding action to avoid further violations was achieved September 7, 1981.

Should you have any further questions please contact Mr. Ed Hill (303-571-7436, Ext. 218).

Very truly yours,

O. R. Lee
Vice Presidert

ORL:pc

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter	)	
	)	
Public Service Company of Colorado	)	Docket No. 50-267
Fort St. Vrain Unit No. 1	)	

AFFIDAVIT

. . . . . being duly sworn, hereby deposes and says that he is Vice President of Electrical Production of Public Service Company of Colorado; that he is duly authorized to sign the file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Reports 81-11, 81-12, and 81-13; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

ORLee
O. R. Lee
Vice President of Electrical Production

STATE OF Colorado)
) ss
COUNTY OF Weld)

Subscribed and sworn to before me, a Notary Public in and for Denver, Co. on this 22nd day of October, 1981.

Audrey L. Kitzman
Notary Public

My commission expires 11-29, 1983