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

OSCAR R. LEE
VICE PRESIDENT

April 15, 1982
Fort St. Vrain
Unit No. 1
P-82109

RECEIVED
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Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
(NRC #6)
611 Ryan Plaza Dr., Suite 1000
Arlington, TX 76012

SUBJECT: I & E Inspection Report 82-05

Dear Mr. Collins:

This letter is in response to the Notice of Violation received as a result of inspections conducted at this facility during the period February 1 to Febraury 28, 1982. The specific items found in the violation and responses are as follows:

A. Technical Specification LCO 4.8.2, "Radioactive Liquid Effluent Limiting Conditions for Operation," states in part that:

"The following conditions shall be observed regarding the controlled release of liquid effluent from the radioactive liquid waste system:. . .

"c) Prior to release, duplicate samples of liquid effluent from the radioactive liquid waste system shall be analyzed isotopically and for gross beta-gamma activity to determine compliance with a) above. If the gross concentration of radioactivity in the undiluted effluent from the radioactive waste monitor tank exceeds 2×10^{-6} μ Ci/cc, the liquids shall be treated by demineralization prior to release to the environment."

Contrary to the above, on February 2, 1982, the NRC inspector determined that duplicate samples for a radioactive liquid release had not been taken prior to the release and that the gross concentration of radioactivity in the undiluted effluent from the radioactive liquid waste tank (1.245E-5 microcuries per milliliter) exceeded the 2.0E-6 microcuries per milliliter limit of LCO 4.8.2, Part c).

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

It was not possible to take a sample before the release because the error in the valve line up was not discovered for about 90 minutes. Samples were obtained from the cooling tower blowdown, downstream at the Platte River, and 1A liquid waste receiver upon notification of the problem.

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

The Surveillance procedure used during liquid waste releases, SR 5.8.2.bc-M has been modified to include an independent valve position verification. This procedure now requires an independent check of all the involved valving prior to and after the release. The check will be accomplished by another operator. This measure provides the independent verification that should avoid future errors of the type discussed in the violation.

3) The date when full compliance will be achieved:

A revision to SR 5.8.2.bc-M was implemented on March 30, 1982. No further action is anticipated.

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

Administrative Procedure P-4, "Surveillance Testing," Issue 3, dated October 26, 1982, states in part:

"e) Section 5.0 requires an entry by a Test Conductor in each step performed in the body of the procedure. . .In addition, each page of the procedure Section 5.0 shall be signed and dated by a Test Conductor. . .

A Test Conductor's initials or signature is verification that:

1) Each step so marked has been completed satisfactorily.

2) The page signed has been completed with all required data entered."

Procedure SOP 62, Revision 23, dated September 21, 1981, Section 2.3, "Routine Operation," states in part:

"2.3.4.10 Start of Liquid Waste Transfer Pump (P-6202 or P-62025) as follows:

(1) Check closed V-6297, liquid waste discharge to circulating water blowdown line."

Contrary to the above, on February 2, 1982, at 12:45 a.m. MST, and after Surveillance SR 5.8.2bc-M for Radioactive Liquid Waste Release No. 518 had been signed off by the test conductor verifying that V-6297 was closed and during the transfer of the contents of 1A receiver to the monitor tank, the licensee discovered that V-6297 was open resulting in the inadvertent release of approximately 250 gallons of radioactive liquid to an unrestricted area.

This is a Severity Level IV Violation.

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

The valve (V-6297) that had been inadvertently left open was immediately closed when the situation was recognized. This occurred at approximately 0045 on February 2, 1982 and this was about 90 minutes after the valve should have been closed.

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

The surveillance procedure used during liquid waste releases, SR 5.8.2bc-M has been modified to include an independent valve position verification. This procedure now requires an independent check of all the involved valving prior to and after the release. The check will be accomplished by another operator. This measure provides the independent verification that should avoid future errors of the type discussed in the violation.

3) The date when full compliance will be achieved.

A revision to SR 5.8.2.bc-M was implemented on March 30, 1982. No further action is anticipated.

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

Very truly yours,

O. R. Lee
Vice President

ORL/skd

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 Report 82-05; 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.

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 the State of Colorado on this 15th day of April, 1982.

Audrey L. Kitzman
Notary Public

My commission expires 11-29, 1983