

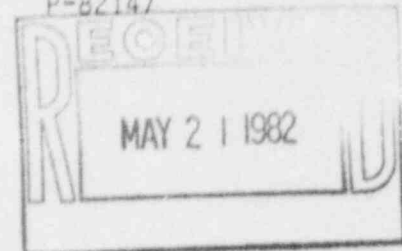


**PUBLIC SERVICE COMPANY OF COLORADO**

P. O. BOX 840 - DENVER, COLORADO 80201

OSCAR R. LEE  
VICE PRESIDENT

May 14, 1982  
Fort St. Vrain  
Unit No. 1  
P-82147



Mr. John T. Collins, Regional Administrator  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, TX 76012

SUBJECT: Inspection Report 82-06  
Docket 50-267

Dear Mr. Collins:

This letter is in response to the Notice of Violation received as a result of inspections conducted at Fort St. Vrain during the periods of March 8 through March 26, 1982. The specific items found in violation and the responses are as follows:

A. Timely Conduct of Surveillance

The Fort St. Vrain Generating Station Technical Specifications required (sic), in paragraph 5.5.3, "The exhaust filters in the reactor building ventilation system shall be tested as follows . . . samples from the charcoal filters shall be laboratory tested . . . following painting, fire . . . ."

Contrary to the above, there was no laboratory test conducted on the charcoal filters after a fire which occurred August 26, 1981.

This is a Severity Level IV violation. (Supplement I.D.)  
(8206-01)

- (1) The corrective steps which will be taken and the results achieved:

Technical Specification Surveillance Requirement SR 5.5.3 states that:

"a) Samples from the charcoal filters shall be laboratory tested after each 4400 hours of operation of the unit, or following painting, fire, or chemical\* release in any ventilation zone communicating with the unit.

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\* Defined as any material which could reasonably be expected to interfere with the charcoal to absorb (sic) methyl iodide."

It is our position that the above caveat applies to all three types of releases mentioned in the surveillance requirement. In our investigation as to whether the capability of the charcoal to adsorb methyl iodide could reasonably have been interfered with as a result of the August 26, 1981 fire, the following instrumentation was consulted: Pressure Differential Indicators (PDI) 7323-2, 7323-3, 7358-2, 7358-3, 7359-2, and 7359-3. These instruments measure the pressure differential across the reactor building exhaust HEPA filters and charcoal adsorbers. These instruments are evaluated on a weekly basis as part of the performance of Surveillance Test SR 5.5.3e-W.

The Pressure Differential Indicators were examined immediately after the August 26, 1981 fire, and daily thereafter. The results were evaluated against the results obtained during the performance of Surveillance Test SR 5.5.3e-W, Week 34, August 24, 1981. Although no records were kept of the daily evaluations, the results of the performance of the Surveillance Test SR 5.5.3e-W, Week 35, August 31, 1981, are documented and indicate no change in the pressure differential across the charcoal adsorbers.

The lack of an increase in pressure differential across the charcoal adsorbers following the August 26, 1981 fire indicates that the ability of the charcoal to adsorb methyl iodide was not interfered with. As Mr. Jaudon properly noted, the results of laboratory testing conducted on the charcoal on December 17, 1981, confirmed the integrity of the charcoal.

It is our position that our investigation and evaluation were prompt and thorough, that laboratory testing of the charcoal following the August 26, 1981 fire was not justified, and that no time were we in violation of surveillance requirement SR 5.5.3.

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

Future releases shall be evaluated on a case-by-case basis, utilizing the methodology illustrated above.

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

We have remained in compliance throughout the time period in question.

B. Use of Correct Procedure Revision

10CFR, Appendix B, Criterion V states, "Activities affecting quality shall be prescribed by documented instructions, procedures . . . and shall be accomplished in accordance with these instructions, procedures . . . ." Licensee Procedure P-4, Issue 3 (10/26/81), "Surveillance Testing Program," states, in paragraph 4.1.4, "The person(s) assigned to conduct the Surveillance Test (Test Conductor(s)) are responsible for: a) obtaining a copy of the latest revision of the Test Procedure for the Surveillance Test assigned from his Department Supervisor."

Contrary to the above, in six instances, between November 3, 1981, and December 31, 1981, calibrations of instruments, which are Surveillance Tests, were conducted using out-of-date procedure revisions.

This is a Severity Level V violation. (Supplement I.E.) (8206-02)

- (1) The corrective steps which will be taken and the results achieved:

Immediately upon learning of the violation all involved personnel were made aware of the problem, Procedure P-4 was re-emphasized.

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

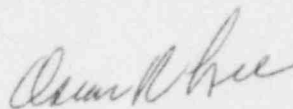
The Scheduling Department has the responsibility to control the issuance of new procedure revisions. When a new revision is issued to the Scheduling Department, Scheduling will determine if that test is "out" for completion. If test is not "out", then the new revision will be placed in file for future use and all out of date copies will be destroyed. If the test is "out", the scheduler will locate the surveillance test and determine if the test has been signed by the Shift Supervisor authorizing the start of the test. If the test that is "out" has been authorized for start then, that test will be considered valid and allowed to continue. If the test has not been authorized to start by the Shift Supervisor, then that out of date test will be removed and destroyed. The revised test will then replace the out of date test.

- (3) The date when full compliance will be achieved.

Compliance specifically addressing the violations was achieved on April 1, 1982. Compliance regarding actions, as listed, to avoid further violation will be achieved by June 1, 1982.

Should you have any further questions, please contact Mr. Ed Hill, (303) 571-7436, ext. 201).

Very truly yours,



Oscar R. Lee

ORL/skd

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter


Public Service Company of Colorado  
Fort St. Vrain Unit No. 1

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Docket No. 50-267

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 82-06; 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 )  
COUNTY OF Weld ) ss

Subscribed and sworn to before me, a Notary Public in and for the State of Colorado  
on this 17<sup>th</sup> day of May, 1982.

Audrey L. Kitzman  
Notary Public

My commission expires 11-29, 1983