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PUBLIC SERVICE COMPANY OF COLORADO

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OSCAR R. LEE
VICE PRESIDENT

50-267

February 18, 1983
Fort St. Vrain
Unit No. 1
P-83073

RECEIVED
FEB 28 1983

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

SUBJECT: I & E Inspection Report 82-31

REFERENCE: NRC Letter dated January 21, 1983

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 period December 1-31, 1982. The following response to the items contained in the Notice of Violation is hereby submitted:

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

   Administrative Procedure P-1, "Plant Operations," Issue 7, dated July 22, 1982, states, in part, that,

   "4.7 EQUIPMENT CLEARANCES AND OPERATIONS DEVIATIONS

   Procedure P-2 describes the system for issuing and controlling equipment clearances and operation deviations to assure that: . . . ."

   * * *

   "4.7.2 Operations personnel are knowledgeable of equipment which is tagged and not available under clearance or off-normal operation condition."

   Contrary to the above, on December 30, 1982, the NRC inspector determined that Valve HV-6314-6 was shut isolating Radiation Transmitters RT 6314-1 and RT 6314-2 placing the system in an off-normal condition without operations personnel knowledge and without the issuance of a clearance or operations deviation.

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This is a Severity Level V Violation. (Supplement I.E.) (50-267/8231-02)

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

Immediately upon being notified by the NRC inspector of the situation, it was corrected which placed the system into the correct operating configuration.

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

All of the supervisory personnel charged with the day to day administration of P-1 were advised to discharge their duties, such that adherence to P-1 and all other such procedures is attained.

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

Full compliance was achieved operationally on December 30, 1982. Corrective steps taken to avoid further violations were completed on January 7, 1983.

2. 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 Program," Issue 3, dated October 26, 1981, states, in part,

"4.1.4. The person(s) assigned to conduct the Surveillance Test (Test Conductor(s)) are responsible for: . . . ."

* * *

"d) Assembling test equipment, special tools and other items specified by the Test Procedure, and identifying them in Section 3.0 . . . ."

Surveillance SR 5.4.10-SA/BiA, "Seismic Instrumentation Functional and Calibration Test," issued June 11, 1982, states,

"5.2.1 Connect a voltmeter to Pins A and B of the cannon plug on the SMA-1 case. While the SMA-1 is running in STEP 5.2.2, verify the voltage >110.0 volts."

Contrary to the above, on December 4, 1982, the NRC inspector determined that the test equipment used in Step 5.2.1 had not been entered in Section 3.0 and that the voltage verification required in Step 5.2.1 had not been taken across Pins A and B as required.

This is a Severity Level V Violation. (Supplement I.E.) (50-267/8231-03)

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

A deviation was written per the Administrative Procedures to add the test equipment that was necessary, and to indicate the voltage verification method used for Step 5.2.1.

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

Personnel involved in the test were reminded of the correct method to add test equipment to this test and in addition that surveillances are to be performed as written unless modified by a deviation in accordance with the Administrative Procedures.

In addition a memo will be sent out to all Results personnel to indicate the correct methods concerning the above.

The test will be revised to indicate the proper test equipment required.

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

March 18, 1983.

3. Technical Specification 7.4.a, "Procedures, Administrative Controls," states, in part, that, ". . . written procedures shall be established, implemented, and maintained covering the activities referenced below:

"1. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972."

Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," states in part,

"I. Procedures for Performing Maintenance

1. Maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures . . . ."

Administrative Procedure P-7, "Work Control - Maintenance on Safety-Related Equipment," Issue 4, dated March 26, 1982, states, in part,

"3.2 All Safety-Related Maintenance and repair work must be performed according to documented instructions, procedures, ..."

Contrary to the above, on December 27, 1982, the NRC inspector determined that a section of the safety-related piping 2" L1171-32 had been removed and replaced without using documented instructions or a procedure.

This is a Severity Level IV Violation. (Supplement I.E.) (50-267/8231-06)

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

PTR #12-312 was issued with instructions for removal and replacement of line 2" L1171-D32. Although the PTR was issued after the completion of replacing the line, it seems to tie the welding documentation to the assigned work. Welding documentation was concurrent with the work progress and indicated that all work performed was in accordance with applicable piping codes, welding procedures, inspections and acceptance criteria addressed in the violation, was pipe hanger 90-HA-4359 not being reconnected to the 3/4" sensing line. the removal of this hanger was not done as part of the removal of L-1171-D32 and therefore not addressed by the supervisor assigning the work. The hanger was reconnected by the Maintenance Department.

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

To avoid future violations, a training class for all Maintenance Personnel will be conducted to review the procedure process required to handle situations of this type as they occur, additionally, the personnel directly involved were in discussion with supervisors that reviewed the work that led to this violation and were instructed as to correct methods of handling future situations.

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

Full compliance will be achieved by March 15, 1983.

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

Very truly yours,

Oscar R. Lee

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CRL/skr