PUBLIC SERVICE COMPANY OF COLORADO
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OSCAR R. LEE
VICE PRESIDENT

December 6, 1982
Fort St. Vrain
Unit No. 1
P-82542

50-267

Mr. John T. Collins, Regional Administrator
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, TX 76011

SUBJECT: I & E Inspection Report 82-24

REFERENCE: NRC Letter dated, November 17, 1982

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 October 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 . . . ."

   Standard Clearance Point Form 4039, Attachment P-2c to Administrative Procedure P-2, dated October 8, 1982, required the main power breaker for Region 27 control rod drive to be in the "OFF" position, Valve V-11277 to be closed and tagged, and Valve V-11127 to be tagged.

   Contrary to the above, on October 12, 1982, while Standard Clearance Point Form 4039 was still in effect, the NRC inspector determined that the main power breaker for Region 27 control rod drive was in the "ON" position. On October 13, 1982, the NRC inspector determined that Valve V-11277 was open and not tagged, and Valve V-11127 was not tagged.

   This is a Severity Level V Violation. (Supplement I.E) (50-267/8224-01)

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

The individual involved was verbally reprimanded for violation APM P-2, and the Manual of Safe Practices concerning equipment clearances.

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

The Standard Clearance Form for Control Rod Drives was revised to allow positioning of the breaker during removal or installation as required by Procedures MP 12-1 and MP 12-6.

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

December 3, 1982.

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

Administative 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: . . ."

* * *

"f) Performing the test, in a functionally sequential order, and filling in the appropriate blanks provided upon step completion."

* * *

"4.2.4 <u>Test Sections and Their Significance</u>"

* * *

"e) . . . In addition each page of the procedure Section 5.0 shall be signed and dated by a Test Conductor. . . at the bottom of each page.

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."

Contrary to the above, on October 22, 1982, the NRC inspector determined that Surveillance SR 5.3.6-M did not have its appropriate blanks filled in upon step completion, and the bottom of each page had not been signed/dated.

This is a Severity Level V Violation. (Supplement I.E.) (50-267/8224-02)

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

Personnel involved with the test were advised as to the proper method of performing the test per P-4.

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

A memo was sent out to all operations personnel informing them of the proper method of signing off surveillance tests when a duplicate copy is utilized for additional personnel involved in the testing process.

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

December 10, 1982.

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

Very truly yours,

OSCAR R. LEE BY

Oscar R. Lee

ORL/skr