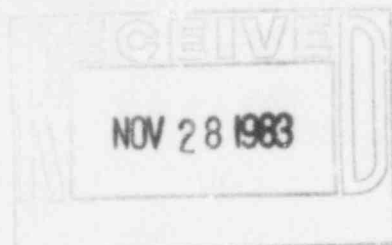




Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651



November 22, 1983
Fort St. Vrain
Unit No. 1
P-83381

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 83-25

REFERENCE: NRC Letter dated October 26, 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 September 1-30, 1983. The following response to the items contained in the Notice of Violation is hereby submitted:

Technical Specification LCO 4.6.1, "Auxiliary Electric System, Limiting Conditions for Operations," states, in part,

"The reactor shall not be operated at power unless the following conditions are satisfied:

* * *

"d) Both the diesel-generator sets are operable, including the following:

* * *

"One diesel generator set may be inoperable for up to 7 days (total for both) during any month provided the operability of the other diesel-generator set is demonstrated immediately. . . ."

8312060264 831122
PDR ADOCK 05000267
Q PDR

4005
1/0

Contrary to the above, the SRI determined that on September 21, 1983, with the reactor operated at power, one diesel-generator set became inoperable and the other diesel-generator operability had not been demonstrated as required.

This is a Severity Level IV Violation. (Supplement I.D.)
(267/8325-02)

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

The matter of an apparent violation of the Technical Specifications concerning emergency diesel generator set testing was discussed at an Enforcement Conference on October 12, 1983, in Arlington, Texas. At that Conference, the Licensee did not agree with the NRC Region IV's recent interpretation of the Technical Specification provisions for emergency diesel generator set testing as evidenced by more than five years of consistent practice and interpretation of the provisions of this Technical Specification. The Licensee is willing to recognize the NRC Region IV's recent interpretation concerning emergency diesel generator set testing and believes that the matter should have been carried as an open or unresolved item to remove the apparent ambiguity in the Technical Specifications as opposed to a Level IV violation.

The aforementioned notwithstanding, at the Enforcement Conference on October 12, 1983, the Licensee agreed to an interim resolution to the difference of opinion by issuing an Operations Order to explicitly define the emergency diesel generator set testing question. Operations Order 83-19 was reviewed by the Plant Operations Review Committee on October 13, 1983 and was issued effective October 14, 1983. The Operations Order included all of the NRC requirements contained in the Confirmatory Action Letter dated October 13, 1983. A response to the Confirmatory Action Letter (P-83349) was sent to the NRC, Region IV, on October 26, 1983, to close out the action items in the Confirmatory Action Letter.

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

The Licensee has complied with the NRC Region IV's recent interpretation of the Technical Specifications concerning emergency diesel generator testing through the issuance of Operations Order 83-19. The Licensee has further committed to submit proposed revisions to the electrical section of the Technical Specifications which will eliminate the apparent ambiguity prior to the end of the next refueling outage.

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

October 14, 1983.

Should you have any further questions, please contact Mr. L. Milton McBride, (303) 571-7436, ext. 201.

Very truly yours,

Don W. Warembourg by Milt McBride

Don W. Warembourg
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

DWW/djc