



of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

November 10, 1983  
Fort St. Vrain  
Unit No. 1  
P-83368

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

NOV 14 1983

SUBJECT: I & E Inspection Report 83-24

REFERENCE: NRC Letter dated October 12, 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 August 1-31, 1983. The following response to the items contained in the Notice of Violation is hereby submitted:

1. Failure to Follow Technical Specification Requirements

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

Administrative Procedure G-9, "Controlled Work Procedures," Issue 1, dated August 27, 1982, Section 4.1, "CWP Processing, Controlling and Implementation," states, in part,

"SHIFT SUPERVISOR 11. Coordinates CCT's and FT's to plant conditions and signs the CWP original at the completion of the work and related activities."

\* \* \*

"NED-SITE

13. Coordinates update of Control Room/forwards CWP to QA/QC."

Contrary to the above, on August 10, 1983, the NRC inspector determined that Control Work Permit (CWP) 82-255, which modified a plant system, had been surrendered due to work completion on January 13, 1983, with the system subsequently returned to service without having a written procedure to operate the newly modified system, without having the shift supervisor's signature on the CWP original verifying work completion, and without having updated control room/shift supervisor design documents (piping and instrumentation drawings). The NRC inspector also determined that the following CWP work was completed and the modified system returned to service without meeting the above requirements:

<u>CWP</u>	<u>WORK COMPLETED</u>
82-48	December 27, 1982
82-83	April 6, 1983
82-173	July 22, 1983

This is a Severity Level IV Violation. (Supplement I.D.)  
(50-267/8324-01)

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

All Controlled Work Procedures (CWP's) cited have been completed as required except for CWP 82-48 which is expected to be completed by November 18, 1983. In addition, a Quality Assurance monitoring program was initiated to study the current CWP process. The results of this program presented on November 9, 1983, in the presence of the Resident Inspector, identified a number of weaknesses. Further corrective measures will take these findings into account.

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

Administrative Procedures will be revised as necessary to account for the weaknesses identified through the Quality Assurance monitoring program completed on November 9, 1983, as well as those identified in the Notice of Violation. These revisions will, as a minimum, concentrate on the control of modification work to ensure that necessary procedures are in effect prior to placing a newly modified system into service and that the update of control room/shift supervisor design documents is completed as expeditiously as possible following the completion of the CWP.

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

The above referenced Administrative Procedures will be revised by December 31, 1983.

2. Failure to Follow Design Control Requirements

Code of Federal Regulations 10 CFR 50, Appendix B: Criterion III, "Design Control," Sentence 1, states, in part,

"Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in Part 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. . . ."

Technical Specification 7.4.2, "Procedures, Administrative Controls," states, in part, that, ". . . written procedures shall be established, implemented, and maintained. . . ."

Administrative Procedure P-6, "Controlled Work Procedures," Issue 2, dated August 4, 1980, Section 3.0, states, in part,

"3.8 A Work Review Committee (WRC) reviews all CWP's to:"

\* \* \*

"b) Evaluate the effect on other plant systems, conditions or operations so that the work can be accomplished without compromising plant safety margins, violating Technical Specifications, administrative procedures or endangering plant personnel protection."

Contrary to the above, the NRC inspector determined that for Change Notice/Control Work Permit CN 1295/CWP 82-122 no measures had been established to provide updated written procedures that would reflect this plant modification apparently due to the failure of the WRC to evaluate the effect of this CWP on other plant systems, conditions or operations.

This is a Severity Level IV Violation. (Supplement I.D.)  
(50-267/8324-02)

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

Written procedures impacted by Change Notice/Controlled Work Procedure CN 1295/CWP 82-122 have been updated to reflect the plant modification. In addition, the Quality Assurance monitoring program referenced in the response to Notice of Violation 50-267/8324-01 above addressed the activities of the Work Review Committee. Further corrective measures will take the associated findings into account.

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

In addition to the Administrative Procedure revisions which will be made in response to Notice of Violation 50-267/8324-02 above, an implementing procedure will be developed to specifically govern the activities of the Work Review Committee. This procedure will provide a formal mechanism by which the impact of plant modifications on departmental procedures can be identified and the necessary procedural revisions can be made.



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

The above referenced implementing procedure will be developed by January 31, 1984.

3. Inadequate Procedure/Specification

Criterion V to Appendix B of 10 CFR 50 states, "Instructions, procedures, or drawings shall include appropriate quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Fort St. Vrian FSAR commitments to ANSI 45.2.5 - 1974, Section 4.3 states, in part, "Inspections shall be performed prior to and during the production of concrete to verify the adequacy and proper operation of measuring, mixing, and transporting equipment in accordance with ACI 304, ASTM C-94, . . . ."

ASTM C-94 states, in part, "When a truck mixer or truck agitator is used for transporting concrete, discharge of the concrete shall be completed within 1 1/2 hour, or before the drum has revolved 300 revolutions, whichever comes first."

Contrary to the above, Deviation Report (DR) 82-206-1-H deleted this requirement from specification 75-J-02, "Mixing and Delivering Concrete," without imposition of alternative acceptance criteria. Even though ASTM C-94 permits relaxation of these limits, partially as a result of deletion of these requirements, placements of Building 10-W-4800-6-015 indicated honeycomb areas, rock pockets and cold joints.

This is a Severity Level IV Violation. (Supplement I.D.) (50-267/8324-05)

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

ASTM C-94 permits the purchaser to waive the 1-1/2 hour discharge time and 300 drum revolutions limitation if the concrete is of such a condition that it can be placed without the addition of water. PSC deleted this requirement from the concrete specification (as permitted by ASTM C-94 para. 10.7) in order to allow adequate time for the concrete truck to travel from the batch plant to the plant site, to clear through plant security, to perform the required sampling tests, and to place the concrete. It should be noted that the deletion of these requirements was made by means of Deviation Report (DR) 82-206-1-D and not DR 82-206-1-H as mentioned in the NRC letter of Notice of Violation. PSC did determine that the concrete for this particular wall pour did meet all of the receiving inspections and tests and was placeable, but due to other problems such as limited vibration, poor lighting, and delays in clearing the concrete trucks through security onto the plant site, the voids and honeycomb in the concrete did occur.

Prior to the next concrete placement for Building 10, PSC undertook the necessary corrective measures as discussed with the NRC Site Inspector to resolve the problem with the voids and honeycombs. The corrective measures included such items as providing additional concrete vibration, better lighting and work scaffold areas, and a reduction in the amount of time required to clear the concrete trucks through plant security. Full compliance with these items was achieved on August 5, 1983. Upon implementing the corrective measures, all remaining concrete placements on Building 10 were made without incident.

In summary, PSC does not believe that a violation occurred when the 1-1/2 hour and the 300 drum revolution requirements were properly waived in accordance with ASTM C-94. It should be noted that once the voids in the concrete were discovered, PSC took action and stopped construction on the Building 10 project until the corrective actions as previously discussed were put into effect. However, in order to comply with the NRC inspector's request, the 1-1/2 hour and 300 drum revolution requirements were reinstated for all of the remaining concrete placements associated with Building 10.

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

We believe this item is closed and no further action is required.

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

Full compliance is currently met.

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*

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DWW/djc