



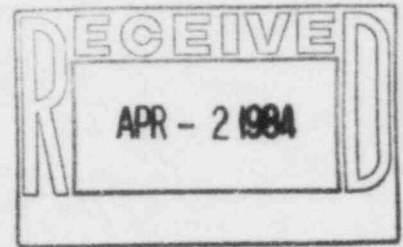
# Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

50-267

March 28, 1984  
Fort St. Vrain  
Unit No. 1  
P-84097

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 84-04

REFERENCE: NRC Letter dated March 5, 1984

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 February 6-10, 1984. The following response to the items contained in the Notice of Violation is hereby submitted:

## Failure to Follow Procedures

Technical Specification 7.4.d states that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure. Specifically, Section 4.1.6.3 of HPP-26, "Radioactive Material Control and Handling," Issue 6, dated July 7, 1983, stated, in part: ". . . clothing not meeting the limit of 100 counts per minute (CPM) above background shall be stored for decay and subsequent rewashing."

Contrary to the above, a maintenance worker was observed to have in his possession on February 9, 1984, a set of unused anticontamination clothing that he had surveyed which indicated greater than 400 CPM above background and he did not store them for decay and subsequent rewashing.

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This is a Severity Level V Violation. (Supplement IV)  
(267/8404-01)

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

The maintenance worker involved in the incident was retrained on February 13, 1984 regarding the release limits for anticontamination clothing and his associated responsibilities. Attached is a copy of the training attendance record for this individual. The training was provided by the Health Physics Supervisor.

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

A memo was sent to all Fort St. Vrain employees on March 7, 1984 describing current practices regarding fixed contamination levels on anticontamination clothing and each individual's responsibility with respect to use of potentially contaminated anticontamination clothing. The memo was sent by the Radiation Protection Manager, and a copy is attached. In addition, all Health Physics Technicians were required to review the Notice of Violation and Health Physics Procedure HPP-26, "Radioactive Material Control and Handling," Issue 7, to ensure familiarity with their responsibilities and the procedural requirements. This review was completed on March 20, 1984. A copy of the training attendance record is attached.

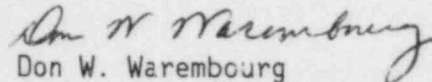
- (3) The date when full compliance will be achieved:

March 20, 1984

-3-

Should you have any further questions, please contact  
Mr. F. J. Borst, (303) 571-7436, ext. 203.

Very truly yours,

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

DWW/djc

Attachments



PUBLIC SERVICE COMPANY OF COLORADO  
FORT ST. VRAIN NUCLEAR GENERATING STATION

Attach. RPAP-1B  
Issue 6  
Page 1 of 1

RADIATION PROTECTION DEPARTMENT

TRAINING ATTENDANCE RECORD

Date 3/13/84 Time 1300 Instructor J. Schlegel

Length of Session 1.0 Hours

Material covered (brief abstract): Anti-C release limits,  
frisking responsibilities & procedures, notification  
responsibilities when limits are exceeded.

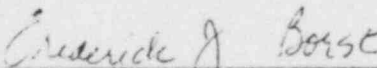
In attendance (please sign):

DBates

DATE: March 7, 1984  
TO: All FSV Employees  
FROM: Frederick J. Borst, Radiation Protection Manager, FSV  
ATTN: Distribution  
SUBJ: ANTI-CONTAMINATION CLOTHING

As you probably know, the use of anti-contamination clothing (Anti-C's) at FSV is continuing to increase as the plant ages. In order to minimize the financial impact of this increase, the Health Physics unit recycles (washes) the yellow non-disposable Anti-C's after use. What you may not know is that after Anti-C's are washed, fixed contamination levels up to 500 cpm may still exist on the Anti-C's.

Due to these potential contamination levels, it is important that the Anti-C's be utilized only for work in Health Physics Controlled Areas (HPCA's). Anti-C's should not be removed from designated storage areas in order to perform work outside of HPCA's, eg. Boiler Feed Pump work, etc. If you feel that you need "coveralls", due to the nature of any non-radiological work, contact your supervisor.

  
\_\_\_\_\_  
Frederick J. Borst

FJB/djc

Distribution:

Brey  
Gahm  
Starnner (EBASCO distribution)





## RADIATION PROTECTION DEPARTMENT

## TRAINING ATTENDANCE RECORD

Date 3-20-84 Time N/A Instructor N/ALength of Session N/A Hours

Material covered (brief abstract): attached is a copy of  
a Level V violation # (267/2404-21) and a  
copy of HRP-26, Issue 7 page 4. Review  
both. Your signature indicates your  
understanding and compliance

In attendance (please sign):

Leo Hutchins  
Ken V. Wanner  
Ed. P. Rogers  
Ray D. Hall  
Paul Morris  
J. Brown  
Steve S. Shivers  
Mike Spatt  
Al. Hoes chief  
W. Moore



- 4.1.4.2 The release limits shall be  $\leq 0.4$  m<sup>2</sup>/hr fixed contamination (approx. 2400 cpm on RM-14 or RM-15 with HP-210 probe) and  $\leq 1000$  DPM/100 cm<sup>2</sup>  $\beta$ ,  $\gamma$  removable (loose). A limit of  $\leq 10$  DPM/100cm<sup>2</sup>  $\alpha$  shall also apply.

NOTE: In keeping with the Alara philosophy and better detection capability of the counting equipment at Fort St. Vrain, tools, equipment, etc. shall not be released for unrestricted use unless removable  $\beta$ ,  $\gamma$  surface contamination is  $\leq 100$  DPM/100 cm<sup>2</sup> unless authorized by the Health Physicist or his designate.

- 4.1.4.3 For tools or equipment which cannot be decontaminated, contamination control measures should be used as per Step 4.2 and tagged per Step 4.3 as applicable.

#### 4.1.5 Ion Exchange Resins

- 4.1.5.1 Demineralizer Cartridges, when removed from system should be drained of as much liquid as possible.

- 4.1.5.2 When the cartridge has drained, seal it into poly bag, place in an empty drum, and R.M.I. Tag (Attachment 6.8) per Section 4.3.

- 4.1.5.3 Transport to level three per Section 4.2 and store for processing.

#### 4.1.6 Anti-Contamination Clothing

- 4.1.6.1 Clothing should be laundered after each use.

- 4.1.6.2 After clothing is laundered, frisk thoroughly with an RM-14/15 with an HP-210 probe. Rewash clothing if the fixed contamination level exceeds 500 cpm above background.

- 4.1.6.3 Clothing not meeting the limit of Step 4.1.6.2 after two washings shall be stored for decay and subsequent rewashing.

APPENDIX A  
NOTICE OF VIOLATION

Public Service Company of Colorado  
Fort St. Vrain Nuclear Generating Station

Docket: 50-267/84-04  
License: DPR-34

Based on the results of an NRC inspection conducted during the period of February 6-10, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified:

Failure to Follow Procedures

Technical Specification 7.4.d states that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure. Specifically, Section 4.1.6.3 of HPP-26, "Radioactive Material Control and Handling," Issue 6, dated July 7, 1983, stated, in part: "... clothing not meeting the limit of 100 counts per minute (CPM) above background shall be stored for decay and subsequent rewashing."

Contrary to the above, a maintenance worker was observed to have in his possession on February 9, 1984, a set of unused anticontamination clothing that he had surveyed which indicated greater than 400 CPM above background and he did not store them for decay and subsequent rewashing.

This is a Severity Level V Violation. (Supplement IV) (267/8404-01)

Pursuant to the provisions of 10 CFR 2.201, Public Service Company of Colorado is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: MAR 05 1984

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