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Company of Colorado

February 22, 1996
Fort St. Vrain
P-96010

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Docket No. 50-267

SUBJECT: Licensee Event Report 96-01, Final Report

REFERENCE: Facility Operating License No. DPR-34

Gentlemen:

Enclosed is a copy of Licensee Event Report No. 50-267/96-01, Final, submitted per the requirements of 10 CFR 50.73(a)(2)(i)(b).

If you have any questions regarding this report, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,

Frederick J. Borst
Decommissioning Program Director

FJB/SWC

Enclosure

cc: Regional Administrator, Region IV

Mr. Robert M. Quillin, Director
Radiation Control Division
Colorado Department of Public Health and Environment

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PDR ADOCK 05000267
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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Fort St. Vrain Station

DOCKET NUMBER (2)

05000267

PAGE (3)

1 OF 6

TITLE (4)

Failure to Test Area Radiation Monitors

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
1	20	96	96	001	00	2	22	96		05000
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)		0	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER	
			20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
			20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)			
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME

M. H. Holmes, Project Assurance Manager

TELEPHONE NUMBER (include Area Code)

(303) 620-1701

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
				N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e. approximately 15 single-spaced typewritten lines) (16)

On January 23, 1996, with Fort St. Vrain facility decommissioning activities over 95 percent complete, it was discovered that the monthly functional test of the two required area radiation monitors had not been performed as required. The test interval specified in Decommissioning Technical Specification (DTS) SR 3.3.1 was exceeded on January 20, 1996.

DTS 3.3 requires that two area radiation monitors be operable, one on the refueling floor and one in the truck bay, until all radioactive material that could exceed the 15 mR/hr setpoints has been removed from the Reactor Building. Although nearly all such radioactive material has been removed, the subject area radiation monitors are still required to be operable. Failure to perform the functional test in accordance with DTS SR 3.3.1 constitutes a condition prohibited by the Decommissioning Technical Specifications and is reported per 10 CFR 50.73(a)(2)(i)(B).

This event was caused by inattention to controls for identifying and performing required surveillance tests. Upon discovering that the functional test had not been performed as required, the test procedure was reissued and completed. Both monitors were found to be operable.

REQUIRED NUMBER OF DIGITS/CHARACTERS
FOR EACH BLOCK

BLOCK NUMBER	NUMBER OF DIGITS/CHARACTERS	TITLE
1	UP TO 46	FACILITY NAME
2	8 TOTAL 3 IN ADDITION TO 05000	DOCKET NUMBER
3	VARIES	PAGE NUMBER
4	UP TO 76	TITLE
5	6 TOTAL 2 PER BLOCK	EVENT DATE
6	7 TOTAL 2 FOR YEAR 3 FOR SEQUENTIAL NUMBER 2 FOR REVISION NUMBER	LER NUMBER
7	6 TOTAL 2 PER BLOCK	REPORT DATE
8	UP TO 18 -- FACILITY NAME 8 TOTAL -- DOCKET NUMBER 3 IN ADDITION TO 05000	OTHER FACILITIES INVOLVED
9	1	OPERATING MODE
10	3	POWER LEVEL
11	1 CHECK BOX THAT APPLIES	REQUIREMENTS OF 10 CFR
12	UP TO 50 FOR NAME 14 FOR TELEPHONE	LICENSEE CONTACT
13	CAUSE VARIES 2 FOR SYSTEM 4 FOR COMPONENT 4 FOR MANUFACTURER NPRDS VARIES	EACH COMPONENT FAILURE
14	1 CHECK BOX THAT APPLIES	SUPPLEMENTAL REPORT EXPECTED
15	6 TOTAL 2 PER BLOCK	EXPECTED SUBMISSION DATE

LICENSEE EVENT REPORT (LER)
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FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
Fort St. Vrain Station		05000 267		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 6
				96	-- 001 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

BACKGROUND

The Fort St. Vrain Station (FSV) has been shut down since August 18, 1989, and is being dismantled in accordance with a Decommissioning Order issued November 23, 1992. Decommissioning has involved the removal of all activated and radioactively contaminated components and materials from within the Prestressed Concrete Reactor Vessel (PCRV) and affected systems. Through the end of January 1996, this has involved removal and shipment of over 234,000 cubic feet of radioactive waste from the FSV facility.

All spent nuclear fuel was removed from the FSV Reactor Building and transferred to an on-site Independent Spent Fuel Storage Installation (ISFSI) by June 1992. The ISFSI is located about a quarter mile from the Reactor Building.

Decommissioning activities are being completed as described in the FSV Decommissioning Plan. Section 3.4 of the Decommissioning Plan evaluates eight credible postulated accident scenarios, including fire, loss of electric power, natural disasters, and a heavy load drop of activated graphite components. Although not relied upon to mitigate the consequences of any accident scenario, area radiation monitors [IL]* are required by the Decommissioning Technical Specifications (DTS).

There are two area radiation monitors required by DTS 3.3, one on the Refueling Floor and one in the Truck Bay of the Reactor Building. These monitors are required to be operable until all significantly contaminated or activated items that could exceed alarm setpoints have been removed from the Reactor Building. Alarm setpoints are established at 15 mR/hr during activities not controlled by a Radiation Work Permit (RWP), and 100 mR/hr during activities controlled by an RWP. These monitors are provided to detect abnormal conditions that could indicate unplanned or accidental radiation levels that should be investigated and appropriately resolved.

Removal of activated and contaminated material inherently resulted in increased radiation levels in the Reactor Building, and the DTS provisions allowed alarm

* Energy Industry Identification System (EIIS) Codes

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setpoints to be raised by up to a factor of 2 during activities that were expected to exceed the 100 mR/hr setpoint. The locations of these monitors permitted detection of unplanned radiation levels on the refueling floor, where significantly contaminated or activated material was removed from the PCRVR, and in the truck bay, where this material was released from the Reactor Building.

As with the other three of the four FSV DTS Limiting Conditions (LC), LC 3.3 for Radiation Monitoring Instrumentation was written to be self-canceling. That is, it ceases to apply after all significantly contaminated or activated items that could exceed the alarm setpoints have been removed from the Reactor Building. During the week of January 15, 1996, immediately prior to exceeding the required surveillance interval for SR 3.3.1, PSCo management discussed the status of radioactive material remaining in the Reactor Building with its decommissioning contractor, in preparation for the exiting of DTS LC 3.3 requirements. A complete review of the remaining radioactive material is in progress and it appears that very little radioactive material above 15 mR/hr remains in the Reactor Building. PSCo expects that all DTS requirements for this specification can be satisfied and LC 3.3 can be exited by April 15, 1996.

EVENT DESCRIPTION

On January 23, 1996, PSCo discovered that the monthly Channel Functional Test of the area radiation monitors, FSV procedure SR 3.3.1-M, "Radiation Monitor Functional Test," had not been performed as required by January 19, 1996. Operations personnel responsible for performing the test initially believed that the test had been performed but was misplaced, however, no such completed surveillance procedure was found. SR 3.3.1-M was reissued to Operations personnel and was satisfactorily completed on January 24, 1996. Both area radiation monitors were found to be operable as designed.

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ANALYSIS

Violation of a Decommissioning Technical Specification requirement is a serious matter that indicates a breakdown in PSCo's management controls over license requirements. However, there was no safety consequence associated with this oversight.

The satisfactory performance of the Channel Functional Test on January 24, 1996, indicates that the area radiation monitors had been functionally operable during the time that their surveillance lapsed. Also, since decommissioning activities in the Reactor Building are being conducted under RWP controls, the monitor setpoints were adjusted for 100 mR/hr, in accordance with LC 3.3 requirements. There were few if any items remaining in the Reactor Building that could have exceeded this setpoint during an unplanned event. Worker exposures are controlled for specific tasks by area surveys and other RWP controls, and do not rely upon the area radiation monitors on the Refueling Floor and truck bay.

CAUSE

The failure to perform the monthly Channel Functional Test of area radiation monitors in SR 3.3.1-M is attributed to human error and a breakdown in management controls.

SR 3.3.1-M was due by January 12, 1996, with a 25 percent allowable extension to January 19, 1996. It was delivered to the Control Room for use by Operations personnel in December 1995, but was not performed. It was also identified on three periodically issued computerized lists of scheduled surveillances that are approaching or have exceeded their normal due date, or are within the 25 percent extension period. These "flags" were overlooked by Operations personnel and by the compliance engineer.

Although PSCo has had management controls in place to ensure completion of required surveillances, it is acknowledged that after over three years of successfully performing DTS surveillance requirements, and with decommissioning nearing the

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completion of physical work activities, there was an unacceptable complacency in those individuals involved.

CORRECTIVE ACTIONS

Upon confirmation that SR 3.3.1-M had not been performed as required, the procedure was reissued and satisfactorily completed.

Operations and compliance personnel involved have been reminded of the importance of satisfying all requirements of the Decommissioning Technical Specifications.

Upon confirmation by its decommissioning contractor that all significantly contaminated and activated items that could exceed 15 mR/hr have been removed from the Reactor Building, PSCo will walkdown the Reactor Building to independently verify this condition, and will then document the satisfaction and exiting of DTS LC 3.3 requirements. PSCo expects this to be complete by April 15, 1996.

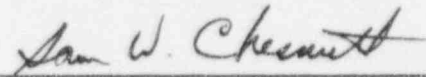
This is considered an isolated occurrence and no further action is planned.

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TEXT CONTINUATION

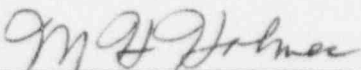
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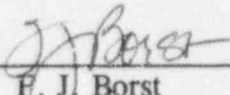
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S. W. Chesnutt
Project Assurance



M. H. Holmes
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F. J. Borst
Decommissioning Program Director