

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Fort St. Vrain, Unit No. 1										DOCKET NUMBER (2) 0 5 0 0 0 0 0 0 0 0				PAGE (3) 1 OF 0 4		
TITLE (4) SR 5.10.4b-X Not Performed Following Maintenance Work																
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)						
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME N/A				DOCKET NUMBER(S) 0 5 0 0 0 0 0 0 0 0			
0 3	1	9 8	5 8	5	0 0 6	0 0	0 4	1 8	8 5					0 5 0 0 0 0 0 0 0 0		
OPERATING MODE (9) N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)														
POWER LEVEL (10) 0 0 0		20.402(b)				20.405(a)				80.73(a)(2)(iv)				73.71(b)		
		20.405(a)(1)(i)				80.38(a)(1)				80.73(a)(2)(iv)				73.71(a)		
		20.405(a)(1)(ii)				80.38(a)(2)				80.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 388A)		
		20.405(a)(1)(iii)				X 80.73(a)(2)(i)				80.73(a)(2)(viii)(A)						
		20.405(a)(1)(iv)				80.73(a)(2)(ii)				80.73(a)(2)(viii)(B)						
		20.405(a)(1)(v)				80.73(a)(2)(iii)				80.73(a)(2)(ix)						
LICENSEE CONTACT FOR THIS LER (12)																
NAME Jim Eggebroten, Technical Services Engineering Supervisor										TELEPHONE NUMBER AREA CODE 3 0 3 7 8 5 - 2 2 2 4						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS						
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE) X NO																

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

During the time period from December 21, 1983 through May 2, 1984, there were five Controlled Work Procedures (CWPs) in which maintenance work disturbed fire retardant material in fire barrier penetration seals. These CWPs did not require, nor ensure, that the surveillance test SR 5.10.4b-X, "Fire Barrier Penetration Seals Post Maintenance Inspection" be performed immediately following completion of maintenance, as required by the Fort St. Vrain Technical Specifications. The surveillance test SR 5.10.4a-A, "Fire Penetration Seals Annual Inspection", which incorporates SR 5.10.4b-X, was completed on May 25, 1984, following discovery of this discrepancy. This event is being reported per 10 CFR 50.73(a)(2)(i)(B).

This condition was not evaluated for reportability until March 19, 1985, due to procedural inadequacies, and the discrepancy between the event date and this submittal date is addressed in the Analysis Section.

The plant was operating at approximately 70% thermal power until January 20, 1984, when it was shutdown for refueling and plant maintenance. The plant remained shutdown through May 16, 1984, at 1450 hours when the initial criticality for refueling Cycle 4 was achieved.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

FACILITY NAME (1) Fort St. Vrain, Unit No. 1	DOCKET NUMBER (2) 05000	LER NUMBER (6)			PAGE (3)		
		YE R	SEQUENTIAL NUMBER	REVISION NUMBER			
		85	006	00	02	OF	04

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

EVENT DESCRIPTION:

Fort St. Vrain Technical Specification SR 5.10.4 requires that immediately following any maintenance which disturbs the retardant material in the fire barrier penetration seals, that surveillance test SR 5.10.4b-X shall be done to verify that the fire barrier penetration seal is returned to its previous condition. LCO 4.10.4 requires that if a fire barrier penetration seal is disturbed, a continuous fire watch shall be posted on either side of the disturbed seal.

A CWP is a detailed step-by-step work plan that reflects the requirements of the job and includes such items as prefabrication, fabrication instructions, inspections, cleaning, testing, installation, and any other pertinent information. It is written per the requirements of the Controlled Work Procedure Manual and Administrative Procedure G-9, "Controlled Work Procedures".

During the period from December 21, 1983 through May 2, 1984, there were five CWPs performed involving maintenance work which disturbed retardant material in fire barrier penetration seals. In two of the five CWPs the requirements for a fire watch to be posted, and performance of SR 5.10.4b-X following maintenance, were included in the "General Notes" section of the Process/Inspection/Testing Record (PITR) of the CWP. The "General Notes" of the PITR are for general information only, and the statements are not required to be signed off. The remaining three CWPs had no requirements for performance of SR 5.10.4b-X or the posting of a fire watch.

In May, 1984, the Quality Assurance Division identified that the surveillances had not been performed as required. Per the contractor's procedures, anytime a fire barrier penetration seal is disturbed, a fire watch is required to be posted. However, there is not a required sign-off in the procedure to be used as documentation.

Through the use of two Corrective Action Requests (CARs), Quality Assurance Personnel brought this to the attention of the appropriate personnel.

Surveillance test SR 5.10.4a-A, "Fire Penetration Seals Annual Inspection", was performed immediately following Quality Assurance's determination of the problem in May, 1984. This surveillance test requires inspection of all fire barrier penetration seals. Surveillance test SR 5.10.4b-X, "Fire Barrier Penetration Seals Post Maintenance Inspection" (the surveillance test which would normally be performed), requires inspection of only the seal which was disturbed during the maintenance. During the performance of SR 5.10.4a-A, no fire barrier seals were found to be unacceptable.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

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TEXT (If more space is required, use additional NRC Form 368A's) (17)

ANALYSIS OF EVENT:

The development of CWP's is controlled by the Controlled Work Procedure Manual and Administrative Procedure G-9, "Controlled Work Procedures". At the time of this event, Issue 1 of the CWP Manual and Issue 5 of G-9 were in effect. Neither of these procedures clearly stated that SR 5.10.4b-X was to be performed following maintenance. Neither the CWP Manual nor G-9 required that this step be signed off, therefore the requirement was included only in the "General Notes" section of the Pitr in two of the CWP's. In three CWP's, the requirement was not included. The surveillance SR 5.10.4a-A, which was performed following Quality Assurance's determination of this discrepancy indicated that penetration seals were adequately replaced. Both G-9 and the CWP Manual have been revised to clarify the CWP process and to designate one individual (the Work Coordinator) to be responsible for all Pitr sign offs. The contractor performing the maintenance indicated that a fire watch was established, as required by their procedures.

Neither G-9 nor the CWP Manual require that Operations personnel be notified of actions taken to comply with Technical Specifications should maintenance work of the CWP require action in accordance with a Technical Specification limit or requirement. In this instance, a fire barrier penetration seal was disturbed, and Operations personnel were not notified that a fire watch had been posted. Operators were unable to document compliance with LCO 4.10.4.

Following the close-out of the Corrective Action Requests on March 12, 1985, Quality Assurance personnel forwarded the completed CARs to the Technical Services Department to review for possible NRC reportability, as required by Administrative Procedure Q-16, "Corrective Action Requests". On March 19, 1985, it was deemed necessary to report this occurrence under 10 CFR 50.73(a)(2)(i)(B). Appropriate revisions to Q-16 have been initiated to provide for a more timely transmittal from the Quality Assurance Division, following their discovery of a discrepancy, to the Technical Services Department, for review to determine reportability.

CAUSE DESCRIPTION:

The cause of the event is attributed to inadequate procedures. The procedure did not clearly identify the need for the surveillance to be performed.

CORRECTIVE ACTION:

SR 5.10.4a-A, "Fire Penetration Seals Post Maintenance Inspection", was performed following discovery of this discrepancy. All seals were found to be acceptable.

The procedures governing the writing and implementation of CWP's (Administrative Procedure G-9, "Controlled Work Procedures" and the CWP Manual) have been modified to include requirements for surveillances to be included in the Pitr and to be signed off by the CWP Work Coordinator.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)

Fort St. Vrain, Unit No. 1

DOCKET NUMBER (2)

0 5 0 0 0 | |

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NUMBER NUMBER NUMBER

8 5 — 0 0 6 — 0 0 0 4 OF 0 4

PAGE (3)

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

The CWP Manual and Administrative Procedure G-9 will be further modified to include a specific reference to the performance of Technical Specification surveillances. In addition, both G-9 and the CWP Manual will state that the Technical Services Department will review the CWP to ensure that steps are included in the PITR, as necessary, to assure that the Shift Supervisor will be notified of any action being taken (such as a fire watch or the performance of a surveillance) to assure compliance with the Technical Specifications.

Laurie S. McKittrick
Laurie S. McKittrick
Technical Services Technician

Jim Eggebroten
Jim Eggebroten
Technical Services Engineering Supervisor

Licensing Review By:

Jim Granling
Jim Granling
Nuclear Licensing-Operations Supervisor

C. H. Fuller by WJF
C. H. Fuller
Station Manager

J. W. Gahm
J. W. Gahm
Manager, Nuclear Production



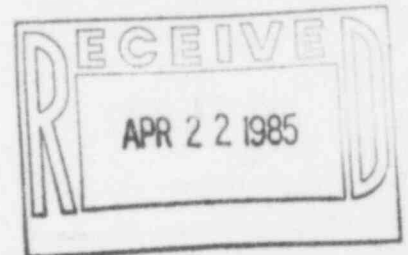
Public Service

16805 WCR 19 1/2, Platteville, Colorado 80651

**Public Service
Company of Colorado**

April 17, 1985
Fort St. Vrain
Unit No. 1
P-85132

Regional Administrator
Attn: Mr. E. H. Johnson
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



Docket No. 50-267

SUBJECT: Licensee Event Report
85-006, Final Report

REFERENCE: Facility Operating
License No. DPR-34

Dear Mr. Johnson:

Enclosed please find a copy of Licensee Event Report
No. 50-267/85-006, Final, submitted per the requirements of
10 CFR 50.73(a)(2)(i)(b).

Sincerely,

J. W. Gahm
Manager, Nuclear Production

Enclosure

cc: Director, MIPC

JWG/djm

85-224

~~EX-85~~
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