

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado
Fort St. Vrain

Docket: 50-267/85-07
License: DPR-34

Based on the results of an NRC inspection conducted during March 1-30 and April 1-16, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

Failure to Follow Procedures

10 CFR 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings." This requirement is implemented by the licensee's Final Safety Analysis Report, Section B.5.2, "Quality Assurance Programs."

1. Maintenance Quality Control Inspection Program MQCIM-1, Issue 1, dated January 21, 1985, requires that inspection hold points in a procedure be signed off by a maintenance quality control inspector before work will be allowed to continue.

Contrary to the above, the NRC inspectors determined that MQC hold points incorporated into the control-rod-drive-refurbishment procedures were not signed off by QC and work was allowed to continue.

This is a Severity Level IV Violation. (Supplement I.D.)
(50-267/8507-01)

2. Fuel Handling Procedure Work Packet FHPWP-100-18, Issue 1, dated March 24, 1985, Task 35, "Assemble Gear Box Housing and Gear Train," required installing the second-stage duplex pair (-200-37) with the relieved side of the outer races facing away from the housing shoulder, and verifying that the bearings were properly seated and required shims (-200-68) installed.

Contrary to the above, on April 15, 1985, the NRC inspectors determined that even though the workman had signed off the step as complete and maintenance quality control had signed off the hold point verifying step completion, a bearing had been installed backwards. This was identified during subsequent back-EMF testing when the inner and outer races separated causing the ball bearings to fall out and the second stage gear to move toward and rub against the drum support.

This is a Severity Level IV Violation. (Supplement I.D.)
(50-267/8507-02)

3. Administrative Procedure Q-15, "Control of Nonconforming Items," Issue 3, dated June 23, 1982, requires for an NCR disposition involving repair, that the SQAS determine and denote on the NCR any appropriate inspections that may be required and the organization responsible for performing such inspections, and sign the appropriate block.

Contrary to the above, on March 5, 1985, the NRC inspectors determined from a review of previously processed nonconformance reports (NCR) addressing control-rod-drive-refurbishment repairs, that the superintendent of QA services (SQAS) had not denoted the appropriate inspections and responsible organization. The NRC inspectors were unable to identify what QC requirements were used for repairs which affect quality.

This is a Severity Level IV Violation. (Supplement I.D.)
(50-267/8507-03)

4. Administrative Procedure Q-15, "Control of Nonconforming Items," Issue 3, dated June 23, 1982, states that the QA/QC/MQC assigned to a department or area in which a nonconforming hardware item is identified, is responsible for initiation of a Nonconformance Report (NCR).

Station Service Request SSR 84500853, dated November 20, 1984, required the fabrication of seven control-rod-drive-assembly shaft potentiometer drives in accordance with Drawing SLR D120-1-240, Revision B, and maintenance QC verified their conformance on MQC General Inspection Procedure, dated January 18, 1985.

Contrary to the above, on April 8, 1985, the NRC inspector determined that (1) nonconforming control-rod-drive-assembly-shaft-potentiometer drives had been identified and a NCR was not initiated.

This is a Severity Level IV Violation. (Supplement I.D.)
(50-267/8507-04)

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: APR 26 1985