

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-267/84-32

License: DPR-34

Docket: 50-267

Licensee: Public Service Company of Colorado  
P. O. Box 840  
Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

Conference Conducted: November 14, 1985

Report prepared by:

R. E. Ireland  
R. E. Ireland, Chief, Special Projects and  
Engineering Section

5/16/85  
Date

Approved:

E. H. Johnson  
E. H. Johnson, Chief, Reactor Projects Branch 1

5/21/85  
Date

Conference Summary

A management conference was held at the NRC Region IV offices in Arlington, Texas, on November 14, 1984, with officials of the Public Service Company of Colorado to discuss a number of issues related to restart and continued operation of the Fort St. Vrain Nuclear Generating Station (FSV). The discussions covered (a) the major conclusions of NRC's October 1984 Assessment Report transmitted to PSC on October 16, 1984, by the Director, Office of Nuclear Reactor Regulation, (b) NRC perspectives on management and operation of the FSV facility, and (c) current licensing items. The slides used during these discussions are attached to this report.

Results: The licensee stated that the Public Service Company of Colorado will do whatever is necessary to correct any outstanding problems and that the company will apply those resources necessary to put the facility in a safe and reliable operating condition. The NRC staff stated that, in addition to issues already identified, the problems with the reserve shutdown system and the control rod suspension cables would have to be resolved prior to restart of the

reactor. The staff also stated that it had not yet determined whether any specific enforcement actions would be taken as a result of the problems identified in the assessment report. Further inspection effort would be needed to make this determination.

It was emphasized that NRC would need a documented commitment from the licensee, in the near future, which could be used to form the basis for scheduling and planning those NRC inspection and technical review activities which would be necessary in connection with supporting a decision to allow the facility to resume power operations. The licensee agreed that such information would be provided.

The NRC staff stated that PSC should consider the Assessment Report as examples of NRC findings that warrant attention but not as a necessarily complete compilation. Each of the Assessment Report actions that would need to be completed prior to restart was briefly summarized. It was emphasized that PSC would need to provide timely and complete documentation for review by NRC with respect to each of these actions if delays were to be avoided owing to the need for NRC to request additional information. It was agreed that a meeting between PSC and NRC technical staff should be scheduled in the near future to discuss actions in greater detail.

With respect to ongoing licensing actions, the staff emphasized that PSC should see early resolution of matters related to the PCRV tendons and that the work related to fire protection issues (Appendix R) should get moving. It was noted that PSC has the lead on resolving technical questions in connection with LCO 4.1.9 and that PSC should either commit to carryout the 100% load rejection test or justify why it need not be done. With respect to Building 10 structural design criteria and electrical modifications, the staff stated that further review was to be done.

A number of items concerning plant management, plant operations and PSC/NRC communication, were discussed. It was agreed the scope and schedule for the management review being carried out for PSC by the NUS Corporation would be submitted for NRC comment in the immediate future. PSC also agreed that NUS should submit its reports to NRC and PSC simultaneously. PSC's schedule and plans for implementation of any recommendations would be submitted soon thereafter.

With respect to improvement in communications between PSC and NRC, the staff stated that openness and candor were need to assure that misunderstandings do not occur regarding identification of requirements which must be met and the nature and relevance of commitments made by PSC in meeting those requirements. It was stated that, if misunderstandings do arise, they should be brought to NRC management attention so that clear, singular resolution could be achieved. The staff stated that the forthcoming management audit and the resolution of technical issues could be separated.

It was agreed by NRC and PSC that there would be need for additional meetings at both technical and management levels to assure that problems needing resolution are clearly defined and answered and that schedules are established. The staff stated that its inspection activities would likely be increased to follow PSC activities prior to resumption of reactor operations.

Persons Participating in the Conference:

NRC:

RIV: R. D. Martin, Regional Administrator  
P. S. Check, Deputy Regional Administrator  
E. H. Johnson, Chief, Reactor Projects Branch 1  
R. A. Cooley, Chief, Operator Licensing Section  
R. E. Ireland, Chief, Special Projects and Engineering Section  
P. C. Wagner, Project Manager  
D. A. Powers, Technical Reviewer

IE: J. T. Collins,

NRR: G. C. Lainas, Assistant Director, Operating Reactors,  
Division of Licensing  
J. R. Millen, Chief, ORB-3

Licensee:

R. F. Walker, President  
C. K. Miller, Senior Vice President, Operations  
O. R. Lee, Vice President, Electric Production  
J. W. Gahm, Manager Nuclear Product  
H. L. Brey, Executive Staff Assistant  
B. W. Diest, Licensee Consultant (NUS)

State of Colorado:

A. J. Hazle, Colorado Department of Health

PUBLIC SERVICE COMPANY OF COLORADO  
MANAGEMENT MEETING

PURPOSE

- To REVIEW THE MAJOR CONCLUSIONS OF THE ASSESSMENT REPORT
- To PROVIDE NRC PERSPECTIVE ON RELATED ISSUES
- To OUTLINE CURRENT LICENSING ITEMS



## ASSESSMENT REPORT ACTIONS

### ACTIONS TO BE COMPLETED PRIOR TO RESTART:

- CONTROL ROD PROBLEM:
  - IDENTIFY AND CORRECT FAILURE MECHANISM OR PROVIDE OTHER COMPENSATORY MEASURES
  - PERIODIC SURVEILLANCE/INSPECTION/PREVENTIVE MAINTENANCE PROGRAM
  - PREVENT OVERDRIVING RODS (PROCEDURAL)
  - RESERVE SHUTDOWN HOPPER TEST
  - PROCEDURE FOR REACTOR SHUTDOWN UNDER MOISTURE INGRESS OR LOSS OF PURGE FLOW
  - TAKE TEMPERATURE READINGS OF CONTROL ROD DRIVES
- OVERALL CONDUCT OF OPERATIONS:
  - THIRD PARTY REVIEW OF PSC MANAGEMENT STRUCTURE AND PRACTICES (SCOPE AND SCHEDULE PRIOR TO REVIEW)
  - NRC TO RECEIVE REPORTS SIMULTANEOUSLY
- TECHNICAL SPECIFICATION UPGRADE:
  - REVIEW AND REVISE (NEW PROPOSED TECHNICAL SPECIFICATIONS TO BE SUBMITTED BY APRIL 1, 1985)
  - INTERIM PROCEDURES IMPLEMENTED ON SPECIFIC ITEMS
- WATER INGRESS:
  - DEVELOP A PLAN TO CARRY OUT PSC "MOISTURE INGRESS COMMITTEE" RECOMMENDATIONS
  - PERIODIC REPORTS ON PROGRESS TO THE NRC
- SCHEDULE FOR LONGER RANGE ITEMS:
  - WITHIN 60 DAYS AFTER RESTART

## MANAGEMENT INVOLVEMENT

### ISSUES

- FREQUENCY AND TYPE OF PLANT TOURS BY PLANT SUPERVISORS AND PSC SENIOR MANAGERS.
- NRC INSPECTORS OFTEN ARE THE FIRST TO IDENTIFY OFF-NORMAL CONDITIONS WHICH SHOULD HAVE BEEN REPORTED BY SHIFT CREWS OR MAINTENANCE PEOPLE TO PLANT MANAGEMENT.
- MANAGEMENT PHILOSOPHY

## PSC'S OPERATING ATTITUDE

### ISSUES

- INITIATIVE IN PURSUING REGULATORY MATTERS
- HTGR "DIFFERENCES"
- PSC LICENSING STAFF CAPABILITIES
- TECHNICAL STAFFING
- DESIGN CONTROL

## PLANT OPERATIONS

### ISSUES

- PROCEDURAL VIOLATIONS
- CORRECTIVE ACTIONS
- FORMALITY OF OPERATIONS
- HOUSEKEEPING
- MAINTENANCE
- MORALE



## COMMUNICATIONS AND COMMITMENTS

### ISSUES

- LICENSING CORRESPONDENCE IS SIGNED BY A VARIETY OF INDIVIDUALS, THERE IS NOT A SINGLE POINT OF CONTACT WITH THE NRC.
- COMMITMENT TRACING
- INTERNAL COMMUNICATIONS
- KEEPING NRC INFORMED
- MEETING SCHEDULES

## LICENSING ITEMS

- PCRV TENDON WIRES
  - IDENTIFICATION OF CORROSION MECHANISM
  - MITIGATION OF CORROSION
  - SURVEILLANCE PROGRAM
- APPENDIX R
  - COMPLETE TECHNICAL EVALUATIONS
  - PERFORM MODIFICATIONS THAT ARE NECESSARY
- POWER TO FLOW TECHNICAL SPECIFICATION (4.1.9)
  - DEVELOP APPROPRIATE REVISION
- STARTUP TEST PROGRAM
  - DEVELOP JUSTIFICATION FOR CHANGES TO THE TEST PROGRAM,  
OR COMMIT TO PERFORMING 100% LOAD REJECT TEST
- BUILDING 10 AND ELECTRICAL MODIFICATIONS
  - NRC REVIEWING ADEQUACY OF THE DESIGN BASES