



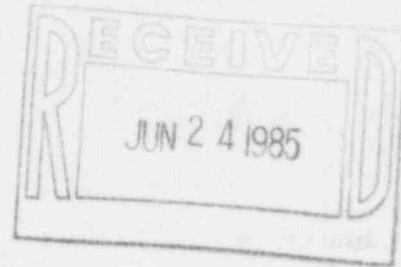
Public Service

16805 WCR 19 1/2, Platteville, Colorado 80651

Public Service
Company of Colorado

June 21, 1985
Fort St. Vrain
Unit No. 1
P-85215

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



Docket No. 50-267

SUBJECT: I&E Inspection Report 85-11

REFERENCE: NRC Letter, Johnson to
Lee, dated 05/22/85
(G-85196)

Dear Mr. Johnson:

This letter is in response to the Notice of Violation received as a result of inspections conducted at Fort St. Vrain during the period April 15-19, 1985. The following response to the items contained in the Notice of Violation is hereby submitted:

1. Failure to Follow Procurement Procedures

10 CFR Part 71.109, Subpart H, "Quality Assurance," concerning quality assurance requirements applying to design, purchase, and fabrication of radioactive material transportation packages, states, in part, "The licensee shall establish measures to assure adequate quality is required in documents for procurement of material, equipment," In addition, Fort St. Vrain Administrative Procedure Q-4, "Procurement Document Control," paragraph 4.8.2, states, "Revisions to the PO (purchase order) that do not affect the technical or quality requirements which is for purchase order clarification purposes only, may be generated by a buyer's memo."

52-076/85
8507310134 850715
PDR ADOCK 05000267
Q PDR

Contrary to the above, the NRC inspector determined on April 18, 1985, that materials and equipment used in the construction of an NRC certified Type B package were purchased by memorandum dated October 8, 1982. Furthermore, the purchase was procured on a purchase order that was not provided a quality assurance review.

This is a Severity Level IV Violation. (Supplement V) (267/8511-01)

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

The cause of the events leading to this Notice of Violation have been identified as a misunderstanding of the applicability of the Administrative Procedure Q-4 and the Code of Federal Regulations Part 71.109 requirements as they apply to the Public Service Company - General Atomic Settlement Agreement (i.e., the FSV Reactor Fluctuation Program) and Services purchase orders in general. As an initial corrective action, a no-cost purchase order will be initiated incorporating Purchase Orders N-3931 (superseded by Purchase Order N-4574) and N-4403. Purchase Order N-4403 was written as a Services Purchase Order under which materials were received on site for the handling and disposal of control rods. The new no-cost purchase order will delineate the materials received under the above Purchase Orders that have a potential use in the Instrumented Control Rod Drive (ICRD) or control rod changeout and disposal program. This purchase order will also specify the applicable QA documentation requirements for the needed materials and will be processed through the required review channels at FSV. In addition, previous procurements from GA Technologies are being reviewed by the Nuclear Engineering Division for similar anomalies. A completion date of July 31, 1985 has been committed to for this review as noted in PSC's response to I&E Inspection Report 85-03 dated May 1, 1985 (P-85146).

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

Further violations of 10CFR Part 71.109 will be avoided by revising the PSC Administrative Procedure Q-4. The procedure will be revised to require the cognizant procuring individual to issue a supplement to the Quality Related Services Purchase Order in the event hardware items are procured under the terms of an associated Services Purchase Order. All Quality Related Service Purchase Orders under which hardware is procured shall therefore be controlled by QA/QC receiving procedures.

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

Review of previous procurements from GA Technologies will be completed by July 31, 1985, as previously committed to in P-85146 dated May 1, 1985. The no-cost purchase order comprised of Purchase Order N-3931, Purchase Order N-4574, and Purchase Order N-4403 will also be completed by July 31, 1985. The revision as outlined above to the PSC Administrative Procedure Q-4 will be incorporated into the current Quality Assurance program to revise the Q-4 procedure.

2. Failure To Conduct QA Receipt Inspection

10 CFR Part 71.115(a), Subpart H, states, in part, "The licensee shall establish measures to assure that purchased material, equipment, . . . conform to the procurement documents. These measures must include . . . , and examination of products upon delivery."

In addition, Fort St. Vrain Administrative Procedure Q-7, "Control of Procured Materials and Services," paragraph 4.4.1, "Material Receiving," states, in part, "All quality related items or equipment . . . including purchases . . . , shall require a receiving inspection."

Contrary to the above, the NRC inspector determined on April 18, 1985, that the licensee had received burial canisters, included with the certification of an NRC Type B shipping cask, and had not performed a quality assurance receipt inspection of the burial canisters.

This is a Severity Level IV Violation. (Supplement V)
(267/8511-02)

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

This Notice of Violation is an extension of I&E Violation 8511-01 outlined above. Because hardware was procured under a Quality Related Services Purchase Order (i.e., hardware for the handling and disposal of Instrumented Control Rod Drives and control rods), Stores Department had no purchase order on file by which to receive the material. Inter-Department Memo PPC-84-0236 dated January 30, 1984 (attached) from Mr. D. Warembourg to all Nuclear Engineering, Quality Assurance, and Production personnel outlines the three criteria, of which at least one must be met, for correct receipt of material on site. The hardware for Instrumented Control Rod Drives and control rods arrived prior to the implementation of this memo. This memo in conjunction with the changes to the Administrative Procedure Q-4 outlined in the response to I&E Violation 8511-01 should prevent further violations of this type.

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

Further violations of 10CFR71.115 and Administrative Procedure Q-7 will be avoided by adherence to Inter-Department Memo PPC-84-0236 and the revised PSC Administrative Procedure Q-4 requiring the cognizant procuring individual to supplement the Quality Related Services Purchase Order in the event hardware is to be received under the terms of the associated Services Purchase Order.

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

The revision to PSC's Administrative Procedure Q-4 will be incorporated into the Current Quality Assurance program to revise the Q-4 procedure.

-5-

Should you have any further questions, please contact
Mr. Frank J. Novachek, (303) 571-7436, ext. 201.

Sincerely,

J.W. GAHM by *J. Borst*

J. W. Gahm
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

JWG/djc

Attachment

INTER-DEPARTMENT MEMO - PUBLIC SERVICE COMPANY OF COLORADO

PPC-84-0236

DATE: January 30, 1984
TO: All Nuclear Engineering, Quality Assurance, and Production Personnel
FROM: Don W. Warembourg, Manager, Nuclear Production, FSV
ATTN:
SUBJ: MATERIAL ACCESS CONTROL

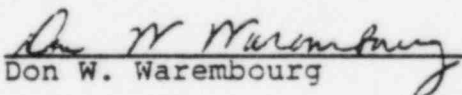
At the Nuclear Regulatory Commission exit interview of January 27, 1984, the Senior Resident Inspector brought to Public Service Company Management's attention a potential weakness in our procurement and inspection procedures for quality related materials.

To summarize, the weakness involves the possibility of bypassing the receiving warehouse and the Quality Assurance Department receiving inspections for material brought on site. Conceivably, this weakness could permit the installation or use of non-qualified materials. Obviously, the final resolution of this problem will require a long term effort to identify the procedural and administrative controls that must be implemented.

In the interim, and effective immediately, the Security Department has been instructed to permit material to be brought through the delivery gate only if one of the following conditions is met:

1. It has been received by Stores and is accompanied by a Purchase Order; or
2. It is accompanied by a properly completed Security Form 5 which also has been acknowledge by Quality Assurance; or,
3. It is material that is identified on the then current "Common Material Access List" (most recent issue attached).

Material that does not meet at least one of the above criteria will not be permitted on site. If you have questions in this regard, please direct them to your manager.


Don W. Warembourg

DWW/alk

INTER-DEPARTMENT MEMO - PUBLIC SERVICE COMPANY OF COLORADO

PPC-84-0128

DATE: January 17, 1984
TO: Donald R. Alps, Security Supervisor
FROM: Charles H. Fuller, Tech./Admin. Services Manager, FSV
ATTN: Lead Security Officers, Contract Security Agency
SUBJ: COMMON MATERIAL ACCESS LIST

The following are common materials or supplies required on a regular basis and need not be identified by a purchase order before admittance to the Protected Area:

MATERIAL

Bulk Chemicals
Coffee
Cylinder Gases
(Hydrogen, Argon, etc.)
Data General
Food and Candy
Fuel Oil
Gasoline
Helium
IBM Parts
Liquid Nitrogen
Office Supplies
PSCo Mail
Soda Pop
Telephone Parts
Towels & Rugs
U.S. Mail
Water & Radiochemistry Cross-Check Samples
Xerox Parts

The above items (except bulk containers) will be searched physically, or by the use of the magnetometer and explosive detector, prior to entry into the Protected Area.

*This list is referenced in Section 11 of FSV Security Instructions.

AUTHORIZED BY

Charles H. Fuller

DATE

01/18/84

CHF/mlt