

APPENDIX A

NOTICE OF VIOLATION

Name of Licensee: Public Service Company  
of Colorado

Docket: 50-267/85-17

Facility Name: Fort St. Vrain Nuclear  
Generating Station

License: DPR-34

During an NRC inspection conducted on June 17 - August 16, 1985, violations of NRC requirements were identified. The violations involved failures to report reactor protection system actuations to the NRC and violation of a Limiting Condition for Operation. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Failure to Report

10 CFR 50.72, "Immediate Notification Requirements for Operating Nuclear Power Reactors, in paragraph (b) non-emergency events, (2) Four-hour reports, requires, in part, ". . . the licensee shall notify the NRC as soon as practical and in all cases within four hours of the occurrence of any of the following: . . . (ii) Any event or condition that results in manual or automatic actuation of any Engineered Safety Feature (ESF), including the Reactor Protection System (RPS)."

10 CFR 50.73, "Licensee Event Report System," also requires in part, a 30-day written report of Reactor Protection System actuations.

The licensee's Technical Specification 2.9 states, "The plant protective system is the reactor protective circuitry and the circuitry oriented towards protecting various plant components from major damage. This system includes (1) scram, (2) loop shutdown, (3) circulator trip, and (4) rod withdraw prohibit."

Contrary to the above, the licensee has considered circulator trips as not reportable. The licensee's daily logs list 9 circulator trips in 1984 and 7 circulator trips to date in 1985. Of these 17 circulator trips, only the trip of August 11, 1985, was reported to the NRC.

This is a Severity Level IV violation (Supplement I.D) (50-267/85-17).

B. Violation of Limiting Condition for Operation (LCO)

LCO 4.2.7, the Technical Specifications states, in part, "The PCRV shall not be pressurized to more than 100 psia unless: . . . d) The interspaces between the primary and secondary penetration closures are maintained at a pressure greater than primary system pressure with purified helium gas.

Contrary to the above, during the period from July 30, 1985, when PCRV pressure went above 100 psia, through August 10, 1985, no differential helium pressure was maintained in PCRV penetration interspaces B21 and B23.

This is a Severity Level IV violation (Supplement I.C) (50-267/8517-02).

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 the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas  
this 16th day of Sep. , 1985