



Public Service

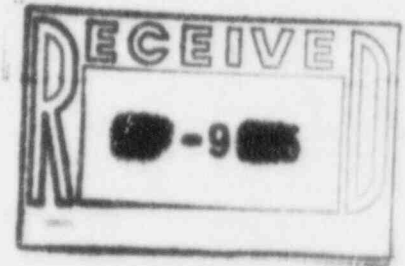
Public Service  
Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

September 4, 1985  
Fort St. Vrain  
Unit No. 1  
P-85303

Regional Administrator  
Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Attention: Mr. E. H. Johnson



Docket No. 50-267

SUBJECT: I & E Inspection Report 85-14

REFERENCE: NRC letter (G-85313)  
Johnson to Lee  
dated August 2, 1985

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 of May 1, 1985 thru May 31, 1985. The following response to the items contained in the Notice of Violation is hereby submitted:

Failure to Follow Procedures

10CFR 50, Appendix B, Criterion V, states, "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 updated Final Safety Analysis Report, Section B.5.2, "Quality Assurance Programs," and Technical specification 7.4, "Procedures - Administrative Controls."

Administrative Procedure G-9, "Controlled Work Procedures," Issue 6, dated December 5, 1984, requires controlled work procedures (CWP) to be prepared in accordance with the CWP manual.

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Controlled Work Procedure Manual (CWPM), Issue 2, dated January 31, 1985, requires the CWP preparer to use the Checklist of General Planning Considerations and incorporate specific or general housekeeping/cleanliness comments from Attachment 6.11 within the work instructions of the process/inspection/test/report (PITR).

Contrary to the above, on May 31, 1985, the NRC inspector determined that: (1) housekeeping specific comments had not been incorporated within the PITR for the control room design review modifications; and (2) cleanliness specific comments had not been incorporated within the PITR for the CRD purge line modifications.

This is a Severity level IV Violation. (Supplement I.D.) (50-267/8514-03)

1. The reason for the violation:

The reason for the violation was procedural ambiguity. The CWP manual requires the CWP preparer to review the subjects of the checklist of general planning considerations and remark as to their applicability relative to a CWP. However, due to the lack of clarity relative to required checklist remark, a variety of responses to the review of the checklist have been used. As a result of these various responses, inconsistent application of the housekeeping and cleanliness requirements occurred.

2. The corrective steps which have been taken and the results achieved:

In response to SRI's findings, the following actions were taken:

- A. An additional review was performed of the CWPM. This has resulted in an interim revision to the CWPM being issued to correct a mis-nomer in the wording of section 5.3.1.3 (use of checklists). This gives clear direction in what attachments are to be used to prepare CWP's. Also, guidance was provided on the use of the terms "yes" or "no" by the CWP preparer when addressing the checklist subjects was added.

B. A memorandum was issued to insure that all personnel involved with writing CWP's are aware of the procedural change and stress the importance of adherence to the CWPM, including the clarifications, when preparing a CWP.

3. Corrective steps which will be taken to avoid further violations:

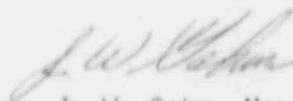
Presently, the CWPM is under review to ensure inclusion of appropriate requirements and compatability of referenced procedures. Part of this program includes review and further clarifications to the CWPM. Comprehensive training for CWP preparation will be conducted after the CWPM is revised. The completion of the CWPM revision, and of CWP preparer's training will be March 31, 1986.

4. The date when full compliance will be achieved:

At this time, compliance has been achieved through the interim changes to the CWPM and the associated memorandum. The ongoing procedural review program will formally document these revisions.

If there are any questions please contact Mr. M. H. Holmes at (303) 571-8409.

Sincerely,



J. W. Gahm, Manager  
Nuclear Production

JWG/MG/deh