

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of Colorado  
Ft. St. Vrain Generating Station

Docket: 50-267  
License: DPR-34

During an NRC inspection conducted on September 23-27, 1985, two violations of NRC requirements were identified. The violations involved the failure to provide adequate training and the failure to perform adequate audits of the emergency preparedness program. 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 Provide Adequate Training

10 CFR 50.47(b)(15) states that "Radiological emergency response training is provided to those who may be called on to assist in an emergency."

Contrary to the above, on September 23-27, 1985, the NRC inspectors determined that licensee emergency training was inadequate as evidenced by the following:

- (1) During emergency response scenario walkthroughs, initial notifications to the State and local authorities and to NRC were made in an improper sequence, and the controlling RERP procedure checklist was incorrect,
- (2) During emergency response scenario walkthroughs, on-shift health physics technicians were unable to determine the habitability of the control room and to determine the radioiodine content of a radioactive plume,
- (3) Training was not given to individuals according to their specific functional role during emergencies, and
- (4) PSC training program failed to establish emergency preparedness training requirements for technical advisors and corporate personnel commensurate with their duties and responsibilities.

This is a Severity Level IV violation (Supplement VIII).

B. Failure to Perform Adequate Reviews of the Emergency Preparedness Program

10 CFR 50.54(t) states that the licensee "shall provide for the . . . implementation and maintenance of its emergency preparedness program." The licensee "shall provide for a review of its emergency preparedness program at least every 12 months . . ." The review "shall include an evaluation for adequacy of interfaces with State and local governments and of licensee drills, exercises, capabilities and procedures."

8601140172 860110  
PDR ADOCK 05000267  
Q PDR

Contrary to the above, on September 23-27, 1985, the NRC inspectors determined that the licensee failed to perform adequate reviews of the emergency preparedness program in that:

- (1) PSC performed inadequate audits for the years 1984 and 1985 by limiting their effort to the observation of annual exercises and as a consequence, focused on verifying procedural adherence instead of procedural adequacy.
- (2) PSC performed inadequate audits of interfaces with State and local governments for the years 1984 and 1985, by limiting their effort to the observation of their emergency operations centers during annual exercises.
- (3) PSC failed to resolve a deficiency identified as Action Request CAR-080, dated August 17, 1984, relating to PSC's ability to staff and activate Fort St. Vrain Station emergency response centers in a timely manner.

This is a Severity Level IV violation (Supplement VIII).

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 10 day of January, 1986