

Public Service Company ^{of} Colorado
P.O. Box 361, Platteville, Colorado 80651

September 10, 1979
Fort St. Vrain
Unit No. 1
P-79205

Mr. Jack Roe
Emergency Planning Review Team
Division of Special Projects
Nuclear Regulatory Commission
Washington, D.C. 20555

Docket No. 50-267

Subject: Emergency Planning,
Fort St. Vrain

Dear Mr. Roe:

As a result of the recent Regional meeting in Las Vegas, we are becoming increasingly concerned about the guidelines and acceptance criteria that is being promulgated as a result of Three Mile Island, and the applicability of that guidance and criteria to Fort St. Vrain.

The guidelines and the acceptance criteria are obviously being based on water reactor technology, and perhaps rightfully so. We are concerned, however, that Fort St. Vrain will be caught up in these guidelines and acceptance criteria without recognition of the inherent safety characteristics of an HTGR and without consideration to the reduced environmental impact of an HTGR under accident conditions as compared with water reactors.

As you are aware, we are in the process of revising our emergency plans including the Radiological Emergency Response Plan involving state/local entities. We are obviously concerned about the guidelines and acceptance criteria that have been or will be promulgated.

The following specific comments are offered which we feel must be clarified as soon as possible if we are to meet the review schedule set forth.

1. A document entitled Emergency Planning Acceptance Criteria for Licensed Nuclear Power Plants was passed out to us in the Las Vegas meeting. This document apparently carries no specific approval at this time and has been issued unofficially without industry review. It is uncertain to us what NRC review this document has received. We are hesitant, to say the least, to begin our planning based on such an unofficial document that

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may be subject to change. Is it NRC's intention to issue this document in the form of a NUREG or Regulatory Guide?

2. The document mentioned in item 1 above set forth certain criteria for which we have the following comments which need clarification.
 - a. The document along with SECY-79-450 indicates that emergency planning must be extended to a ten (10) mile radius as soon as practical but not later than January 1, 1981. We feel this is an unreasonable requirement to impose upon Fort St. Vrain. Our releases at Fort St. Vrain are non-condensable in nature, and for the most credible accident we do not exceed 10 CFR 100 limits at the site boundary. The cost and work associated with extending the EPZ at Fort St. Vrain are not warranted based on the characteristics of an HTGR versus those of a water reactor. Our present EPZ is four (4) miles which is more than adequate given the inherent characteristics of Fort St. Vrain.
 - b. Our emergency operational centers have been established to provide for an onsite command post (equivalent to the technical support center) personnel control center (equivalent to an operations center) and a Forward Command Post at Fort Lupton (equivalent to an emergency operations center). In addition, a management command post will be established at our main headquarters in Denver along with an additional command post at the Division of Emergency Preparedness, Camp George West. These Command posts will meet the general criteria set forth except that the Forward Command post is not within two (2) miles of the site as indicated in Las Vegas meeting. We have already made agreements with the state and local entities for the Fort Lupton command post and have developed our plans and installed some communications equipment in this facility. We need to know as soon as possible if the NRC's position on the Emergency Operations Center is such as to preclude our use of the Fort Lupton facility.
 - c. This document indicates that Emergency Action Levels (EAL's) and Protective Action Guides (PAG's) are being developed by the NRC. At the Las Vegas meeting we were informed that these guidelines will be developed on the basis of activity levels within containment. Again we are concerned that such guidelines will be developed on the basis of water reactor technology, and that such guidelines will not be applicable to Fort St. Vrain. We do not have a containment building as such, and the characteristics of our releases and fission product inventory are considerably

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different from water reactors. Will the NRC guidelines be flexible enough to accomodate Fort St. Vrain?

- d. The document references an early warning alert system, and we were informed at the Las Vegas meeting that the NRC would hold the Licensee responsible for such a system. The document also requires that state/local plans provide for notification of the general populace in the EPZ within fifteen (15) minutes following notification from the facility operator. We assume that such notification is based on the early warning alert system (sirens/tone alert).

We question the value of such a system, especially for Fort St. Vrain where our release is non-condensable in nature and releases do not exceed 10 CFR 100 limits at the site boundary. The cost of such a system will no doubt exceed \$150,000, not to mention operating and maintenance costs. The system will require a constant education process for people moving into or out of the area, and it will be impossible for Licensee's to assure that the general populace is informed about the system at any given time with consideration to transients, tourists and people relocating. Testing the systems will also represent problems and will most certainly result in adverse public relations. For example, our site has several turkey farms nearby. These birds are easily excited by slight changes in their environment, let alone when a system of sirens go off.

All of the costs and the problems are being proposed for a fifteen (15) minute alert system. In our experience, by the time the Licensee can assess the incident, and given the requirement for a fifteen minute notification, the major portion of the release would already have passed the EPZ. Given the gaseous type release of an HTGR we seriously question the value of such an alert system, and again feel that Fort St. Vrain must be given credit for its inherent safety features.

- e. Along with the extension of the EPZ to a ten (10) mile radius, the document is calling for increased radiation monitoring within the EPZ to the ten (10) mile radius. Again, given the nature of Fort St. Vrain we must seriously question the value of radiation monitors beyond the present four (4) mile EPZ.
- f. The document requires that provisions be made for the use of radio-protective drugs. There is clearly no authority on the part of Licensee's for administering these drugs or drugs of any type without a medical prescription.

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3. Fort St. Vrain is not scheduled for review until April 1980. Because Fort St. Vrain is unique, and because most of the guidelines issued for water reactors will not be directly applicable to Fort St. Vrain we question this late review date especially with reference to the pending June date for having all plans reviewed and approved by NRC.

With the many uncertainties and with the limited time available it is essential that guidelines and acceptance criteria to be applied to Fort St. Vrain be resolved as soon as possible.

We recognize that your time will be limited in the upcoming months with reviews of other reactor sites, but we feel we cannot proceed to develop definitive plans without further guidance and without some resolution of the issues noted above. It is requested that we be given the opportunity to meet with you at an early date to resolve these matters so that we can be prepared to have reasonable plans developed for our April review.

Very truly yours,

Don Warembourg
Don Warembourg
Manager Nuclear Production

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cc: Darrell Eisenhut
Jim Miller

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