



Public Service Company of Colorado

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November 12, 1980
Fort St. Vrain
Unit No. 1
P-80399

Mr. George Kuzmycz, Project Manager
U. S. Nuclear Regulatory Commission
Division Project Management
Special Projects
Washington, D. C. 20555

Docket No. 80-267

Subject: Fort St. Vrain Unit No. 1
Technical Specification SR 5.4.1

Dear Mr. Kuzmycz:

As presently written the surveillance test requirements for the Steam Pipe Rupture System listed under Item 2, Table 5.4-2 of SR 5.4.1 requires several checks, tests, and calibrations. We have and continue to experience problems with Item C, which calls for pulse testing one ultrasonic channel with one ultrasonic channel tripped and two pressure channels tripped.

As you are aware the protective circuitry for the Steam Pipe Rupture Logic System is set up for loop isolation on the basis of 2/3 ultrasonic channels tripped in combination with 2/3 pressure or temperature trips inside or outside the PCRV. Under Item C we set up the 2/3 logic condition for pressure and trip one ultrasonic channel which sets us up for loop isolation and reactor scram should we receive any spurious signal from another ultrasonic channel. Due to the noise sensitivity problem, experienced with the ultrasonic system, we find that we have experienced loop isolation and reactor scram on several occasions while conducting this particular phase of the required surveillance test program due to spurious noise.

The function under Item C is redundant in terms of determining operability of the logic circuitry for the Steam Pipe Rupture System because the logic circuitry operability is verified under Item B of this same Technical Specification. The test under Item B, however, is not as prone to spurious signals and trips.

On the basis of the redundancy of Items B and C, and the unnecessary plant transients introduced by Item C, Item C should be deleted from the Technical Specifications. These tests are conducted monthly with the next test due on November 17, 1980. On this basis it is essential that we obtain Technical Specification relief as soon as possible.

*Approved
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George Kuzmycz

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If you have any questions or require any further information please contact Mr. Bill Franek, 303-571-7436. Your immediate attention to this matter will be appreciated.

Yours very truly,

Don W. Warembourg
Don W. Warembourg
Manager, Nuclear Production
Fort St. Vrain Nuclear
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DWW/dkm