



**Public Service**

**Public Service  
Company of Colorado**  
P.O. Box 840  
Denver CO 80201-0840

December 8, 1989  
Fort St. Vrain  
Unit No. 1  
P-89464

A. Clegg Crawford  
Vice President  
Nuclear Operations

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Docket No. 50-267

SUBJECT: Generic Letter 89-10  
Motor-operated Valves

REFERENCES: See Attachment

Gentlemen:

In accordance with the intent of Generic Letter 89-10 (Reference 1) Public Service Company of Colorado (PSC) has performed an engineering evaluation (EE 89-0005) of all motor-operated valves at Fort St. Vrain. The conclusion of this evaluation is that no motor operators are relied upon to prevent or mitigate the consequences of design-basis accidents during defueling. All valves are accessible for manual operation or repositioning at all times. A minimum of five days is available to complete valve alignments in order to avoid damage to the plant in the event of an accident.

Therefore, PSC requests relief from the requirements of Generic Letter 89-10 (Reference 1). The status of the Fort St. Vrain reactor is different from the status that existed at the time of responses to Bulletin 85-03 (References 2, 3, 4, 5, 6, 7 and 8).

The Fort St. Vrain reactor has been permanently shut down as of August 18, 1989 (Reference 9) and defueling was started on November 27, 1989. The Fort St. Vrain reactor will not go critical again. The reactor has been cooled for over three months since the permanent shutdown. It has reached a condition where no permanent damage would result for at least five days after a loss of all cooling, including liner cooling, as presented in "The Safety Analysis Report For Reactor Defueling" Section 5.2.7 (Reference 10).

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Bulletin 89-10 requires licensees to perform two tasks:

- 1) Complete design-basis reviews, any required "prototype" testing, and have a program in place within 5 years or 3 refuelings (whichever is later).
- 2) Have a program description and schedule for all the requested actions available within one year or one refueling outage, (whichever is later).

Fort St. Vrain, being a permanently shutdown plant, has no more refuelings planned. Fuel is being removed permanently from the reactor as of November 27, 1989. It is expected that the reactor will be completely defueled well within the five years permitted for establishing an enhanced motor operated valve performance improvement program as required by Generic Letter 89-10.

The minimum of five days to take corrective action after a loss of all cooling allows adequate time to operate critical valves manually, if necessary. Therefore, PSC believes that no additional measures to improve motor-operated valve performance at Fort St. Vrain are necessary.

The secondary cooling fluid being used at Fort St. Vrain is condensate at a maximum pressure of 300 psig and maximum temperature of 120 degrees F. Any pipe rupture that would release this cooling fluid could be isolated by remote operation of the motor-operated valves, by manual operation of the valves, or by turning off the operating condensate pump(s) without adverse consequences to safety at Fort St. Vrain.

As a result of the conclusions of the engineering evaluation (EE 89-0005) for motor-operated valves, the status of the Fort St. Vrain reactor, the length of time available to take corrective action for any loss of cooling or pipe rupture, and the forecast that the Fort St. Vrain reactor will be defueled before the additional design reviews and corrective actions of Generic Letter 89-10 are required to be complete, PSC requests relief from the requirements of Generic Letter 89-10 for the Fort St. Vrain reactor.

The results of the engineering evaluation EE 89-0005 are on file at Fort St. Vrain and may be examined upon request. PSC requests NRC concurrence that no additional measures to improve motor-operated valve performance are required for Fort St. Vrain. As such, PSC plans to submit no further reports on this issue.

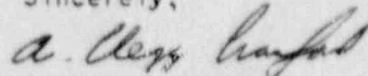
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If you have any questions concerning this matter, please contact Mr. M. H. Holmes at (303) 480-6960.

Sincerely,



A. Clegg Crawford,  
Vice President  
Nuclear Operations

ACC/JMW/km

Attachment

cc: Regional Administrator, Region IV  
ATTN: MR. T. F. Westerman, Chief  
Projects Section B

Mr. Robert Farrell  
Senior Resident Inspector  
Fort St. Vrain

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter

Public Service Company of Colorado  
Fort St. Vrain Unit No. 1

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Docket No. 50-267

AFFIDAVIT

A. Clegg Crawford being first duly sworn, deposes and says: That he is Vice President, Nuclear Operations, of Public Service Company of Colorado, the Licensee herein, that he has read the information presented in the attached letter and knows the contents thereof, and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

*A. Clegg Crawford*  
A. Clegg Crawford  
Vice President  
Nuclear Operations

STATE OF COLORADO )  
COUNTY OF DENVER )

Subscribe and sworn to before me, a Notary Public on this  
8<sup>th</sup> day of December, 1989.

*Delores Romero*  
Notary Public

My commission expires January 6, 1993.



ATTACHMENT 1

TO P-89464

REFERENCES

#### REFERENCES

1. Generic Letter No. 89-10 dated June 28, 1989 (G-89227)
2. PSC Letter, Walker to Gagliardo, dated May 14, 1986, (P-86356)
3. PSC Letter, Walker to Gagliardo, dated September 5, 1986, (P-86538)
4. PSC Letter, Williams to Document Control Desk, dated September 16, 1987, (P-87295)
5. PSC Letter, Williams to Document Control Desk, dated October 15, 1987, (P-87353)
6. PSC Letter, Williams to Document Control Desk, dated January 14, 1988, (P-88001)
7. PSC Letter, Williams to Document Control Desk, dated July 15, 1988, (P-88250)
8. PSC Letter, Williams to Document Control Desk, dated May 8, 1989, (P-89166)
9. PSC Letter, Crawford to Weiss, dated November 21, 1989, (P-89452)
10. PSC Letter, Crawford to Weiss, Dated August 16, 1989, (P-89287)