



Public Service Company of Colorado

16805 ROAD 19½
PLATTEVILLE, COLORADO 80651

April 8, 1981
Fort St. Vrain
Unit No. 1
P-81116



Mr. Darrel G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Subject: Fort St. Vrain Unit No. 1
Post TMI Requirements
Emergency Operations Facilities

Ref: USNRC Generic Letter 81-10

Dear Mr. Eisenhut:

In response to the above referenced letter we offer the following:

1. NRC Position

NUREG-0696 is to be issued shortly to provide more detailed design and functional criteria.

PSC Response

We are in receipt of NUREG-0696 and are presently evaluating the criteria proposed by this document. Based on our preliminary review, the new criteria for the EOF will in all probability eliminate the facility we were planning to utilize for the EOF. In this respect it may be somewhat difficult for us to meet the June 1, 1981 date for the conceptual design of the EOF.

In addition, we proceeded with the construction of our TSC based on the limited guidance of NUREG-0578, and that facility is essentially complete with the exception of various instrumentation and displays. As we indicated in previous correspondence (see P-79312, Item 2.2.2.6.; P-80318, comments on NUREG-0696) our TSC does not meet the physical size requirements of the new criteria, and does not specifically provide separate facilities for the NRC. Since the facility is essentially complete, it is not possible for us to recover to meet some of the new criteria. As you indicated in the regional meetings, the NRC will most certainly evaluate exceptions for those utilities who responded and proceeded in good faith to meet previously scheduled requirements.

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2. NRC Position

Table III.A.1.2-1 (Table B-1 to NUREG-0654, Revision 1), establishes staffing levels for emergency situations. The revision of NUREG-0654 establishes staging of staffing for 30 to 60 minutes rather than requiring capability for required augmentation at 30 minutes. The implementation schedule for licensed operators and STA on shift shall be as specified in Task Action Item I.A.1.3. Any deficiencies in the other staffing requirements of the table must be capable of augmentation within 30 minutes by September 1, 1981 and such deficiencies must be fully removed by July 1, 1982.

PSC Response

In our letter P-80288, August 28, 1980, we responded to the staffing requirements set forth by Table B-1 of NUREG-0654. Although some minor changes have been made to Table B-1 since our response the basic concerns of our response remain unchanged. Following the August 28, 1980 submittal we arranged a meeting with the Emergency Preparedness group (Brian Grimes) and NRR Special Projects (Jim Miller) in an attempt to resolve some of the many issues involving Fort St. Vrain. The meeting which was held on December 10, 1980 brought essentially no results, and to this date we are still awaiting NRC's reply to P-80288. For your convenience please find attached an excerpt of P-80288 which addresses this subject. Until we receive a response to this correspondence we cannot address Table III.A.1.2-1 on the implementation dates of September 1, 1981 and July 1, 1982.

3. NRC Position

The implementation schedule has been changed for ERF's to be operational by October 1, 1982.

PSC Response

PSC intends to meet the implementation date of October 1, 1982 for the ERF's.

4. NRC Position

Emergency Response Facility conceptual design information is to be submitted by June 1, 1981.

PSC Response

PSC intends to submit conceptual design information for the ERF's by June 1, 1981, with the exception of the EOF.

As indicated in Item 1. above we are in a position in which we must evaluate other facilities for use as our EOF because new

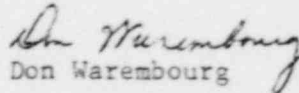
criteria imposed by NUREG-0696 may well eliminate the facility we intended to use. Our conceptual design for the EOF will therefore be delayed until July 15, 1981.

We are continuing our efforts to be responsive to various TMI-2 action requirements, but we are finding it increasingly difficult to meet planning and schedule requirements without response from the NRC to previously submitted positions. We are rapidly approaching the time when we will be unable to meet commitments and schedules set forth without resolution of many of the issues based on criteria that does not appear to be applicable to Fort Saint Vrain.

We realize how difficult it must be to evaluate Fort St. Vrain in many areas, but without that evaluation we are unable to accomplish the volume of front end work that is required to meet the various established schedules and commitments. In fact, because of our peculiar situation and the untimely response to our submittals we are already past the point of recovery in many areas should the NRC choose to refuse to accept our evaluations and the positions we have taken.

We trust that you will take these matters into consideration in terms of the schedules that have been established.

Very truly yours,


Don Warembourg

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