



Public Service Company of Colorado

March 2, 1981
Fort St. Vrain
Unit No. 1
P-81077

To ADM/DME

PDR
LPDR
NSIC
ADM/TIDC
ADM/RSB

Mr. Karl Seyfrit
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012



SUBJECT I & E Circular 81-02

Dear Mr. Seyfrit:

We are in receipt of the subject I & E circular and once again we find the NRC dictating how we should control our people.

We are not in disagreement with the intent of the circular as we realize the importance of the licensed operators in the control room. We do take exceptions to the NRC directing the licensee as to how to maintain appropriate operator alertness and directing the licensee to incorporate such direction into administrative procedures and/or controls.

We do not permit TV, alcohol, drugs, games or horseplay for any employee while on the job, but eliminating perhaps background music and limiting reading material to job procedures will not, in our opinion, make the operator more alert and may, in fact, promote drowsiness on the back shifts. We exercise certain activities such as taking hourly log readings to keep the operator attentive and cognizant of the controls and plant parameters. Equipment operators are required to make equipment rounds and report back to the control room operator. The Shift Supervisor makes routine checks on the control room. These are the types of activities that prove to be effective.

We intend to continue with these types of programs, and we take exception to such directives issued by the NRC placing themselves in a supervisory capacity and dictating how the licensee should comply with the regulations for routine management and supervisory activities.

Had the circular been issued as required reading material only it would have been appropriate and beneficial. We do not feel it is

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appropriate to include the directive for administrative controls. The licensed operators are well aware of their responsibilities and expected performance by virtue of their training. Further written administrative controls, will in our opinion, only serve to reduce the morale of the operating staff.

Very truly yours,

Don W. Warembourg
Don W. warembourg
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

DWW/dkm

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