



# Public Service Company of Colorado

December 31, 1980  
Fort St. Vrain  
Unit No.1  
P-80443

Dr. John F. Ahearne, Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: TMI Action Plan Requirements

Dear Dr. Ahearne:

As you are no doubt aware, we, along with many other utilities, have been struggling to meet the many post-TMI requirements with the struggle being complicated by a myriad of requirements, complicated further by the fact that many of these requirements have been subject to changes in criterion. Having the only HTGR in the country, our problems have been compounded by trying to interpret requirements issued on the basis of water reactor technology and trying to apply these requirements to gas cooled technology. We continue to experience considerable difficulty in our approach to the various requirements in that most of the TMI review teams are unfamiliar with the HTGR concept.

We are continuing our efforts, but we have recently experienced one problem that is of extreme concern. Item I.A.3.1 of NUREG 0737 includes a requirement for the use of simulators, by October 1, 1981, in the operator training program. On December 10, 1980, we met with members of the NRR staff (Special Projects Division and OLB) to discuss this requirement as it pertains to Fort St. Vrain.

Our position is as follows:

1. Fort St. Vrain is a one-of-a-kind reactor and there are no simulators, either generic or plant specific that are available for use in our operator training program.
2. Use of any existing simulators developed for LWR technology would be of little value in our operator training program.
3. Development of a plant specific simulator for Fort St. Vrain is not economically feasible and even if it were feasible such a simulator could not be developed by October 1, 1981. Imposition of simulator training requirements on a small unique reactor, that is not even remotely similar to any other reactor, appears to be an unreasonable requirement.

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4. Although operator training in terms of appropriate operator action in mitigating the consequences of accidents is important, it should be noted that the HTGR is more forgiving in terms of time required for immediate operator action. We feel that our operators could receive adequate training without the use of simulators.
5. Recognizing the intent of simulator training we are prepared to upgrade our operator training program to concentrate more heavily on transient response and hands-on experience as a substitute for simulator training.

We were informed by the NRR staff at the December 10, 1980, meeting that the requirement for simulator training was presently being placed in a proposed regulation and would be issued for comment as a proposed change to 10CFR50.55.

We recognize that we will be given the opportunity to comment on the proposed revision to 10CFR50.55, but we also recognize that it is much more difficult to get a proposed ruling change made after it is issued than perhaps it might be to obtain consideration prior to its issuance.

On this basis we are appealing to the Commission that appropriate consideration be given to Fort St. Vrain prior to the issuance of the proposed regulation. Your consideration in exempting Fort St. Vrain from the simulator training requirements is greatly appreciated. If you should have any questions or require any additional information, please contact Mr. Don Warembourg, Manager of Nuclear Production, (303) 571-7436.

Sincerely yours,

*R. F. Walker*

R. F. Walker  
President

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