



Public Service Company of Colorado

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PLATTEVILLE, COLORADO 80651-9298

August 26, 1981
Fort St. Vrain
Unit No. 1
P-81213

Mr. James R. Miller, Chief
Standardization & Special
Projects Branch
Division of Licensing
Nuclear Regulatory Commission
Washington, D. C. 20555



Subject: NUREG 0737

Ref: NRC Order Dated August 6, 1981

Dear Mr. Miller:

We are in receipt of the above referenced order, but we are somewhat confused in the implications the order may have with specific reference to page 4 wherein it is stated that:

"The licensee shall satisfy the specific requirements described in the Attachment to this Order, as appropriate to the licensee's facility, as early as practicable but no later than 60 days after the effective date of the Order."

As you are aware there has been considerable correspondence involving the various items of TMI-2 and the associated guidelines of NUREG 0737 concerning the applicability of these requirements to Fort Saint Vrain. In some cases the requirements are clearly not applicable to Fort Saint Vrain and other cases the applicability did not provide a well defined path of action. We have evaluated, and responded accordingly, to the individual NUREG 0737 items, but we have not, to date, received any NRC response relative to the various positions we have taken. In order to clarify the implication associated with the Order we believe it is necessary to clarify the various items of the Attachment to the Order.

In this respect we have provided in the attachment to this letter an update of the various NUREG 0737 guidelines which delineates the present status of the items. In many cases, implementation has been completed or will be completed within 60 days. In other cases

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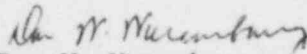
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implementation has not and cannot be accomplished without further resolution. These latter items primarily involve areas where exceptions have been taken, alternatives have been proposed, or existing methods and/or procedures are, in our opinion, adequate to meet the intent of NUREG 0737 as these items are applicable, partially applicable, or unapplicable to Ft. St. Vrain.

You will note from the attachment that we have responded to each item, and with few exceptions our responses were submitted within the schedules set forth by the requesting documents. We were recently informed that the entire review of our responses as well as an overall evaluation of applicability of NUREG 0737 to gas cooled reactor technology has been contracted by the NRC to Oak Ridge National Laboratory.

The key to the Order is the interpretation of the words "as appropriate to the licensee's facility" and the issue at hand, and the intent of our clarification is to provide further information with regard to that wording, and to point out that we obviously cannot implement some of the items which are subject to further action and/or resolution on the part of the NRC.

Very truly yours,


Don W. Warembourg
Manager
Nuclear Production

DWW/skd

Attachment

cc: George Kuzmycz
Jim Miller

ATTACHMENT P-81213

Clarification of Attachment

To NRC Order Dated August 6, 1981

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>PSC Status</u>
I.A.1.1	STA	ALL	(a) Provide STA coverage by degreed individuals (or equivalent), trained to licensee's program.	1/1/81	Letter P-80438, dated December 20, 1980 indicated that the STA training had been completed.
			(b) Submit description of current training program and demonstrate compliance with 10-30-79 letter.	1/1/81	Letter P-80444, December 30, 1980 provided the description of the STA Training, our program for continued training and our long term program for retaining the STA's.
			(c) Submit description of long term training program.	1/1/81	
I.A.2.1	Reactor Operator Qualification	ALL	Submit description of and implement Upgraded Training Program.	8/1/80	The revised operator training program was submitted via P-81002, January 2, 1981, and is presently in effect.
I.C.1	Accident Procedures	ALL	(a) Submit reanalyses of inadequate core cooling and propose guidelines for emergency procedures, OR propose schedule and justify delays.	1/1/81	Item I.C.1 was specifically addressed in our letter P-80438, dated December 20, 1980.
			(b) Submit reanalysis of transients and accidents for emergency procedures, OR propose schedule and justify delays.	1/1/81	Based on several accident reanalyses that PSC had already completed in response to other NRC inquiries, PSC has concluded that no further analyses or reanalyses are required.
I.C.5	Feedback of Operating Experience	ALL	Implement procedures for feedback of operating experience (no documentation submittal is required).	1/1/81	Initial response - P-80438, December 20, 1980 indicated intent to comply. Program has been implemented and is presently in effect.
I.C.6	Correct Performance or Operating Activities	ALL	Implement procedures to verify correct performance of operating activities (no documentation submittal is required).	1/1/81	Initial Response P-80438, December 20, 1980 follow-up response P-81075, February 27, 1981 sets forth PSC position. To date no response has been received.

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>PSC Status</u>
II.B.2	Shielding	ALL	(a) Have available design details for vital area modifications.	1/1/81	Initial response and evaluations submitted via P-79299 December 12, 1979 and P-79312 December 27, 1979. Further clarification in P-80438, December 20, 1980 indicates GDC-19 Guidelines can be met without further action.
			(b) Submit technical deviations to staff positions.	1/1/81	
II.B.3	Post-Accident Sampling	ALL	Submit description of deviations from staff positions.	1/1/81	Initial response P-79299, P-79312 and P-80028. Follow-up response P-80438 indicates compliance by <u>January 1982</u> .
II.B.4	Training to Mitigate Core Damage	ALL	(a) Have available for review a training program for mitigating core damage (no documentation submittal required)	1/1/81	Initial response provided by P-80438 indicates many of the guidelines of H. R. Denton's letter of March 28, 1980 are clearly not applicable to an HTGR. The revised program was submitted via P-81002, January 2, 1981 and is now in effect.
			(b) Implement training program (no documentation submittal required).	4/1/81	
II.D.1	Performance Testing of RV/SRV's	ALL	(a) Submit test program (both BWR/PWR's).	7/1/80 (PWRs) 10/1/80 (BWRs)	Response provided by P-80028 keys Ft. St. Vrain program to EPRI study. Implementation dependent on study result.
			(b) Submit qualification program for PWR's block valve.	1/1/81 (PWRs)	
II.E.1.2	Aux Feed Initiation and Flow	PWRs	(a) Submit final design and documentation on safety grade flow indication	1/1/81	Although not specifically designated as being applicable to Ft. St. Vrain our initial evaluation was forwarded via P-79299, December 12, 1979.
			(b) Submit final design and documentation on safety grade flow initiation.	1/1/81	Further clarification provided by P-80438, indicates existing instrumentation meets the requirements.

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II.E.4.2	Containment Isolation	ALL	(a) Submit documentation justifying minimum containment pressure setpoint for isolation of non-essential penetrations.	1/1/81	Initial response provided via P-79299 December 12, 1979 and P-80028, February 20, 1980. Partial acceptance received from NRC on March 31, 1980.
			(b) Submit statement that purge valves not meeting CSB 6-4 (or interim position) are sealed and verification is performed every 31 days.	1/1/81	Follow-up provided in P-80438 December 20, 1980 with the conclusion that containment isolation is adequate and no further modification is required.
II.F.1	Post-Accident Monitoring	ALL	(a) For noble gas monitor and Iodine/particulate sampling and analysis submit description and justification for deviations from staff requirements.	1/1/81	Initial response provided by P-79130, P-79249, P-79299, P-79312 and P-80028. Further clarification is provided by P-80438.
			(b) Have available the final design information for noble gas monitor and iodine/particulate sampling and analysis.	1/1/81	PSC does have some additional portable iodine monitors on order with an expected delivery of late October or early November, 1981. In the interim PSC has established procedures for iodine sampling that have been reviewed by NRC I & E.
II.F.2	Inst. for Inadequate Core Cooling	ALL	Submit a report detailing the planned instrumentation system for monitoring inadequate core cooling.	1/1/81	Initial response provided via P-79299, December 12, 1979. NRC letter dated March 31, 1980 indicates this requirement has been satisfied.
II.K.2.10	Antic. Trip on LOFW and TT	B&W	Submit final design for anticipatory trip as described in NUREG 0737.	1/1/81	Clearly not applicable to Fort St. Vrain.

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>PSC Status</u>
II.K.2.13	Thermal Mechanical Report	B&W	Submit report on effects of Hi Pressure Injection on vessel integrity for SB LOCA with no Aux Feedwater.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.2	PORV/SV Failures	PWR	Submit report on SB LOCA and probability of failure of PORV/SV/RV.	1/1/81	Not applicable to Fort St. Vrain
II.K.3.3	SRV/SV Failures & Challenges	ALL	Submit report (historical and annually thereafter) of SRV/SV failures and challenges.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.7	PORV Opening Probability	B&W	Submit report on the probability of a PORV opening during an over-pressurization transient.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.9	PID Controller Modification	Selected <u>W</u> plants	Modify the Proportional Integral Derivative Controller (as recommended by <u>W</u>). Advise NRC when modification is completed.	12/1/80	Not applicable to Fort St. Vrain.
II.K.3.12	Anticipatory Trip on Turbine Trip	<u>W</u>	Submit confirmation of Anticipatory Trip. If not currently implemented, submit modification design and schedule for implementation.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.13	Separation of HPCI/RCIC Initiation Levels; Auto Restart of RCIC	BWRs w/HPCI/RCIC	Submit results of evaluation and proposed modification as appropriate.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.16	Reduce Challenges to RV's	BWR	Submit report on actions planned to reduce RV challenges.	4/1/81	Not applicable to Fort St. Vrain.
II.K.3.17	ECCS System Outages	ALL	Submit report on ECCS outages and propose changes to reduce outages.	1/1/81	Report was submitted via P-80441, December 26, 1980.

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>	<u>PSC Status</u>
II.K.3.18	ADS Logic Modifications	BWR	Submit report of feasibility of ADS system logic changes to eliminate need for manual actuation.	4/1/81	Not applicable to Fort St. Vrain.
II.K.3.21	CSS/CPCI Restart	BWR	Submit report of evaluation, proposed modifications and analysis to satisfy staff positions.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.22	RCIC Suction	BWR w/RCIC	Implement procedures and document verification of this change.	1/1/81	Not applicable to Fort St. Vrain.
II.I.3.27	Common Reference for H ₂ O Level Instruments	BWR	Implement change and submit documentation of changes.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.29	Isolation Condensor Performance	BWR w/ICs	Submit evaluation of I.C. performance.	4/1/81	Not applicable to Fort St. Vrain.
II.K.3.30	SP LOCA Methods	ALL	Submit outline of program for model.	11/15/80	Not applicable to Fort St. Vrain.
II.K.3.44	Fuel Failure	BWR	Submit evaluation to verify no fuel failure.	1/1/81	Not applicable to Fort St. Vrain.
II.K.3.45	Manual Depressurization	BWR	Submit evaluation on other than ADS method for depressurization.	1/1/81	Not applicable to Fort St. Vrain.
III.D.3.3	Improved Inplant Iodine Monitoring	ALL	Have available means to accurately measure airborne radiiodine inplant during an accident.	1/1/81	Initial response provided by P-79312 and P-80028. Interim procedures were established. P-80438 indicated the new Radio-chem Lab would be available by March 15, 1981. The Radio-chem Lab is now operational. Additional instrumentation is on order with an expected delivery date of October - November, 1981.
III.D.3.4	Control Room Habitability	ALL	(a) Submit control room habitability evaluation information. (b) Submit modifications necessary to assure CR habitability with a schedule for completion.	1/1/81 1/1/81	Response submitted via P-80438, December 12, 1980 indicates existing conditions are adequate. No further action anticipated.