



# Public Service Company of Colorado

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September 25, 1981  
Fort St. Vrain  
Unit No. 1  
P-81239

Mr. Karl Seyfrit, Director  
Office of Inspection and Enforcement  
Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, TX 76011

SUBJECT: Joint Emergency Exercise Procedures

Dear Mr. Seyfrit:

We have reviewed your letter of July 14, 1981, jointly with the State, and in general we do not have any problems with procedure. We do, however, have the following comments.

1. Conduct of an exercise of this magnitude is often influenced by many factors such as plant status, conditions in the State, as well as other factors. It must be recognized that it may not be possible to predict the date of an exercise some three (3) months in advance. On this basis we can plan and schedule an exercise, but these plans and schedules must necessarily remain flexible.

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We do not know of any requirement within the present regulations to obtain FEMA and NRC approval for scenarios, which is inferred by the instructions. Most importantly we do not have any major problem with submitting the scenario for review and comment, and we would consider those comments in finalizing the scenario. We do have problems, however, if those reviews and comments take the nature of mandatory requirements. Obviously exercises will be planned to test the emergency plan or those aspects of the emergency plan that the State and the Licensee feel are important within budgetary constraints and/or other constraints that may exist. The exercise will

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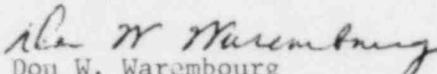
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be planned based on previous exercise critiques to maximize the benefit of the exercise, and in this light comments received from the NRC and FEMA would be carefully considered in finalizing exercise plans. The inference of final approval by FEMA and NRC, however, represents some concern to us in that such final approval appears to be beyond the scope of existing regulations.

We would appreciate receiving any clarification you can provide concerning our comments.

Very Truly Yours,

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

DWW/skd