



Public Service Company of Colorado

5909 East 38th Avenue, Denver, Colorado, 80207

May 28, 1982
Fort St. Vrain
Unit No. 1
P-82168
FSV-24F

Mr. George Kuzmycz, Project Manager
Special Projects Branch
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Reactor Regulation
Washington, DC 20555

Docket No. 50-267

Subject: IE Bulletin 80-06

Reference: P-82054

Dear Mr. Kuzmycz:

Per the meeting held in Denver between yourself and Messrs. Reesy, Niehoff, and Pitchkolan of my staff, this letter provides you with our position in regards to IE Bulletin 80-06.

It is Public Service Company's (PSC) position that the verbal NRC Requests for additional testing of the Fort St. Vrain Plant Protective System (PPS) are unwarranted for the following reasons:

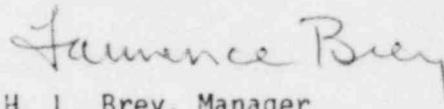
1. The circuitry associated with PPS actuations, trips and resets has been thoroughly analyzed and no problems were identified.
2. NRC's I&E branch has reviewed the information and test results provided by our letter P-82054, and indicated in their letter of May 6, 1982 that all questions raised by the bulletin were resolved.
3. To accomplish such testing, the Fort St. Vrain plant would have to be repeatedly tripped from a power operating level. There are approximately 50 separate trip signals involved thus, testing the entire PPS as requested would repeatedly subject the plant to severe transients. We feel that this presents an undo risk to the plant and plant personnel.

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4. The circuitry of the PPS is continually surveillance tested. This testing is covered by Section 5 of the Technical Specifications.
5. The Fort St. Vrain Station has experienced numerous transients over the years. During these transients there has never been a case identified where the actuation signal reset and prohibited a required trip.

If you have any questions please call Jack Reesy at (303) 571-6643.

Very truly yours,



H. L. Brey, Manager
Nuclear Engineering Division

HLB/MEN:pa