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Public Service Company of Colorado

16805 WCR 15 1/2, Platteville, Colorado 80651

August 23, 1982
Fort St. Vrain
Unit #1
P-82343

Mr. George Kuzmycz
U. S. Nuclear Regulatory Commission
7920 Norfolk Ave.
Bethesda, MD 20034

SUBJECT: Fort St. Vrain Unit No. 1
Request for Release from 70% Power

REFERENCE: 1) P-82229, July 6, 1982
2) ORNL Letter August 4, 1982

Dear Mr. Kuzmycz:

We have reviewed ORNL's letter (Reference 2), and with reference to ORNL's conclusions, we offer the following:

1. ORNL recommended data-taking procedures be utilized (similar to RT-500K), as operations are extended to higher core pressure drops. After every refueling, we develop a rise-to-power program to verify core and physics parameters resulting from the new fuel, different rod patterns, and orifice configurations. We most certainly intend to continue this practice. While we do not intend to conduct RT-500K as written, we will be conducting a rise-to-power program gathering sufficient data to evaluate core parameters as well as any effects of the temperature redistribution phenomenon.
2. ORNL recommended that SR 5.1.7 include a requirement to recalculate the percent RPF discrepancy after each region outlet temperature redistribution. This is not really practical to do since the operating personnel on shift do not have the capabilities or facilities to calculate new RPF discrepancies. As stated in our safety analysis, and in the basis for the Technical Specification, we believe that SR 5.1.7 provides more than adequate frequencies for calculating RPF discrepancies. There are many conservatisms included in the safety analyses, which are in turn reflected in the Technical Specifications. We agree with ORNL that fuel kernel migration effects are cumulative, and in evaluating the overall effects of temperature redistribution and RPF discrepancies, we did take into account the cumulative effects. Most certainly if we find that as we approach higher core pressure drops, the temperature redistribution phenomenon displays characteristics and/or conditions beyond those presently anticipated, these characteristics and conditions will be re-evaluated on terms of the presently proposed Technical Specifications.

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With reference to ORNL's comment concerning the parathetical expression in Item C, we have no problem with the words "shall not be" being inserted as suggested.

Concerning ORNL's comment to include the equation shown on Page 3-1 of GA-C16781 in Tech Spec 2.21, we did initially consider the inclusion of the equation. In terms of what the plant operator needs for routine operation, however, we felt the equation would only serve to add unnecessary confusion to the Tech Spec, since the operator does not have all the necessary information at his finger tips for using the equation, it would serve no useful purpose from an operating view point to include it.

We believe the above comments address the major points in ORNL's letter. If you require any additional information, please let me know.

Very truly yours,


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

DWW/skr