



**Public Service**

January 14, 1991  
Fort St. Vrain  
Unit No. 1  
P-91001

**Public Service  
Company of Colorado**  
P.O. Box 840  
Denver CO 80201-0840

A. Clegg Crawford  
Vice President  
Nuclear Operations

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

ATTN: Mr. Seymour H. Weiss, Director  
Non-Power Reactor, Decommissioning and  
Environmental Project Directorate

Docket No. 50-267

**SUBJECT: PSC RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
ON THE FORT ST. VRAIN PROPOSED DECOMMISSIONING PLAN**

REFERENCES: (See attached)

Dear Mr. Weiss:

The purpose of this letter is to respond to the NRC's Request for Additional Information (RAI), forwarded to Public Service Company of Colorado (PSC) in Reference 1. This RAI was developed based on a preliminary NRC review of the Proposed Decommissioning Plan for Fort St. Vrain Nuclear Generating Station, which was submitted to the NRC in Reference 2. The attachment to this letter provides PSC's response to the two NRC questions provided in Reference 1.

Subsequent to receipt of the RAI, a telephone conference call was held on January 8, 1991, between representatives of the NRC, PSC and PSC's decommissioning contractor, Westinghouse. This conference call was conducted at PSC's request to attempt to clarify the NRC's concerns regarding the radiation protection program and ALARA plans presented in the Proposed Decommissioning Plan.

During this conference call, the NRC indicated that additional detailed questions for PSC would be forthcoming with respect to the radiation protection program and ALARA. Therefore, PSC requests that its response to the radiation protection and ALARA question contained in this RAI be delayed until 30 days after PSC is in receipt of these additional detailed questions.

After completion of this conference call, a meeting has been tentatively scheduled for early February between the NRC and PSC. PSC is pleased to have the opportunity to present its Proposed Decommissioning Plan to the NRC and to answer any questions the NRC may have. It is PSC's belief that this meeting will provide an opportunity for open and meaningful discussion between the two

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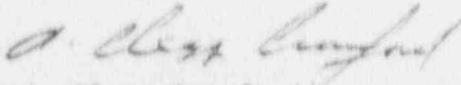
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January 14, 1991  
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parties, so that present and future NRC concerns can be resolved promptly and in a manner that is satisfactory to both the NRC and PSC.

If you have any questions related to the contents of this letter, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,



A. Clegg Crawford  
Vice President  
Nuclear Operations

ACC:CRB/cb

Attachments

cc: Regional Administrator, Region IV  
ATTN: Mr. G.L. Constable, Chief  
Technical Support Section  
Division of Reactor Projects

Mr. J.B. Baird  
Senior Resident Inspector  
Fort St. Vrain

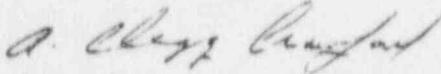
Mr. Robert M. Quillin, Director  
Radiation Control Division  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, CO 80220

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#### REFERENCES

- (1) NRC letter, Erickson to Crawford, dated December 17, 1990  
(G-90296)
- (2) PSC letter, Crawford to Weiss, dated November 5, 1990 (P-90318)

ATTACHMENT TO P-91001  
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO THE FORT ST. VRAIN  
PROPOSED DECOMMISSIONING PLAN

NRC Question No. 1:

*"As stated in our July 25, 1990 request for additional information (RAI) on the FSV Preliminary Decommissioning Plan, the cost estimate must include the cost of each major technical action/activity and the waste disposal cost for each activity. Neither the August 27, 1990 PSC response to those questions nor the PSC November 5, 1990 Proposed Decommissioning Plan included the necessary level of detail for cost information required by 10 CFR 50.82(b)(4). Similarly other cost estimate deficiencies identified in our July 25, 1990 RAI were not resolved in either of the PSC submittals."*

PSC Response:

Subsequent to submittal of the Proposed Decommissioning Plan, two additional submittals were prepared and forwarded to the NRC on December 17 (P-90343) and December 21, 1990 (P-90362). These submittals were provided to address decommissioning cost information and provide additional justification for use of a fixed price contracting arrangement for decommissioning.

PSC letter P-90362, dated December 21, 1990, provides the proprietary information identified and referenced in Tables 5-1, 5-2 and 5-3 of the Proposed Decommissioning Plan, originally forwarded to the NRC on November 5, 1990. This information includes a breakdown of radioactive waste packaging, shipping and disposal costs as requested by the NRC RAI of July 25, 1990 (G-90168). This cost breakdown is provided in support of a detailed breakdown of radioactive waste information, which was provided to the NRC in Tables 3.3-1 through 3.3-6 of the Proposed Decommissioning Plan. Tables included in the plan identified approximate curie content and pre- and post-reduced volume estimates, expected contact radiation levels, proposed volume reduction techniques to be used, waste classification, and expected type and number of shipping containers. The NRC RAI of 25 July 1990 (G-90168) requested that disposal costs be based on waste volume and classification.

PSC letter P-90343, dated December 17, 1990, provided additional detailed information and justification on PSC's approach to establishing the cost of decommissioning, use of a fixed price contract, and provided a detailed work breakdown. In this letter as well as the original proposed plan, PSC committed to provide the NRC with additional cost detail when contract negotiations between PSC and the decommissioning contractor (the Westinghouse team) have been completed.

Four attachments were submitted with this letter, and included the following information:

- o Attachment 1, Decommissioning Financial Assurance for Fort St. Vrain, provides supplemental justification related to the acceptability of PSC's use of its decommissioning cost estimate based on the competitive bid process and award of a firm fixed price contract.
- o Attachment 2, PSC Competitive Bid Process and Award of Fixed Price Contract, provides a detailed summary of the process used by PSC to fully define the scope of the decommissioning effort and to select its decommissioning contractor.
- o Attachment 3, Comparison of PSC Decommissioning Cost Breakdown with Regulatory Requirements and Guidelines, contains a detailed comparison of the contents of the Fort St. Vrain Proposed Decommissioning Plan with existing regulatory requirements and guidance.
- o Attachment 4, Proposed Work Breakdown Structure for the Fort St. Vrain Decommissioning Project, provides the proposed Level IV project breakdown. PSC and the Westinghouse team propose to provide a cost for each of the items listed in this proposed outline.

In reviewing PSC's response (P-90262, dated August 27, 1990) to the NRC RAI dated July 25, 1990 (G-90168), it was noted that PSC committed to provide the following information:

- (1) details on the amounts of special form radioactive waste, if any.
- (2) details of the asbestos removal program for radioactive systems, and expected costs of asbestos removal and disposal.
- (3) specific costs associated with performing the final site survey.

PSC will provide an update of this information when additional information is submitted in response to the forthcoming detailed questions on the radiation protection program and ALARA plan. Additionally, PSC will update the NRC on information provided in the Proposed Decommissioning Plan regarding disposal of low level radioactive waste.

NRC Question No. 2:

*"The proposed Decommissioning Plan does not adequately address the ALARA principle and controls, procedures and equipment to protect employees and the public health and safety during decommissioning as required by 10 CFR Part 20 and 10 CFR 50.82(b)(2)."*

PSC Response:

In the telephone conference call between the NRC, PSC and Westinghouse on January 8, 1991, more detailed concerns were provided to PSC regarding the radiation protection program and the ALARA plan provided in Section 3.2 of the Proposed Decommissioning Plan. In addition to guidance provided in the conference call, the NRC stated that additional detailed questions would be forthcoming in these areas. As noted in the cover letter, PSC requests that its response to this question and any proposed revision to the radiation protection program and ALARA plan be delayed to incorporate any revisions that may be necessary as a result of these detailed questions.

Criteria contained within NRC Regulatory Guides 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations will be As Low As Is Reasonably Achievable" (June 1978), and Regulatory Guide 8.10, "Operating Philosophy for Maintaining Occupational Radiation Exposures As Low As Is Reasonably Achievable" were evaluated during the preparation of the Fort St. Vrain Proposed Decommissioning Plan. However, no direct correlation exists between the individual elements of the Regulatory Guides and the sections of the Proposed Decommissioning Plan. PSC and the Westinghouse team will compare the Proposed Decommissioning Plan with the guidance provided in NRC Regulatory Guides 8.8 and 8.10, and incorporate the results of this comparison in PSC's response to the detailed questions on the radiation protection and ALARA programs when they are received from the NRC.