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**PUBLIC SERVICE COMPANY OF COLORADO**

P. O. BOX 840 DENVER, COLORADO 80201

**OSCAR R. LEE**  
VICE PRESIDENT

August 25, 1982  
Fort St. Vrain  
Unit No. 1  
P-82304



Mr. John T. Collins, Regional Administrator  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, TX 76012

SUBJECT: Unescorted Access for Outside Contractor  
Personnel at Fort St. Vrain

- REFERENCES:
1. NRC Letter dated May 7, 1982,  
J. T. Collins to O. R. Lee (G-82130)
  2. PSC Letter dated May 24, 1982,  
O. R. Lee to J. T. Collins (P-82152)
  3. NRC Letter dated July 26, 1982,  
J. T. Collins to O. R. Lee (G-82230)

Dear Mr. Collins:

Further discussions with the Ft. St. Vrain staff concern employee screening of outside contractor personnel in accordance with the Fort St. Vrain Amended Security Plan has led to the conclusion that the final negotiations with the NRC during the original writing of the Security Plan were entirely verbal and no documentation can be found to substantiate PSC's exact commitment to Section 4.3 of ANSI 18.17-1973. We will, therefore, commit to revising our Security Plan and implementing procedure APM G-4 to provide for a background investigation.

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Messrs. Don Warembourg and Milt McBride have had a telephone conversation with Messrs. G. L. Madsen and J. A. F. Kelly concerning our commitment to ANSI 18.17-1973, wherein the licensee stated that a commitment would be made to conduct a background investigation in accordance with Mr. Bob Clark's memo of November 26, 1977. PSC's outside contractor employee investigations will also allow the use of letters of employment verification from outside contractors which will be audited by PSC's Quality Assurance Department. The major concern at Ft. St. Vrain, as it is at most nuclear power plant sites, is the employment background verification of the union craft personnel who need unescorted access to perform plant maintenance and modification tasks as opposed to outside contractor permanent employees whose employment records are normally accessible. PSC plans to employ the services of an outside investigation agency to perform background investigations for union craft personnel and, if required, outside contractor staff. We are somewhat apprehensive concerning the ability of the licensee to acquire comprehensive background employment data for union craft personnel, but we plan an aggressive approach to acquire the required information and will evaluate the program during the first quarter of 1983.


As was discussed in the aforementioned telephone conversation, PSC is aware of proposed regulatory and industry changes to the current requirements for employee screening and that some nuclear utilities have chosen to anticipate these proposed changes. We do not feel that anticipating changes to regulations is in our best interest and will, therefore, commit only to meeting the requirements set forth in Bob Clark's memo of November 26, 1977 until the applicable proposed regulatory changes are officially released. Therefore, for unescorted access into the protected area, PSC is hereby committing to the following background investigation for outside contractor personnel:

1. A background employment investigation for a minimum of three (3) years prior employment or to the age of eighteen, whichever is less. Any periods of unemployment during the three year period shall be explained and documented.
2. Examination by a licensed psychologist in accordance with the provisions of Administrative Procedure APM-G4.
3. Continued observation for emotional stability in accordance with Fort St. Vrain Administrative Procedure ASP-1.

4. Outside contractors shall be allowed to submit written confirmation that they possess documentation verifying three years past work history or that they possess documents containing verification of work histories from previous employers. If a written confirmation from an outside contractor is used to allow unescorted access, the PSC Quality Assurance Department will audit 20% of the outside contractors each year. The audits of the selected firms will be conducted by auditing 100% of the personnel files for the outside contractor permanent employees having unescorted access. The PSC Quality Assurance Department will also audit the outside investigating agency performing background investigations biennially.
5. There are numerous outside contractor and union personnel who have worked for PSC in various capacities for periods greater than three years. PSC will document these individuals and will exempt them due to their association, in good standing, with the licensee for periods equal to or greater than three years.

The employee screening program described above will require 60 days to implement due to required procedure revisions, contract approvals with an investigation service, etc. PSC hereby commits to implementing the program summarized herein within 60 days of receipt of your written concurrence with the proposed outside contractor employee screening program. Should further questions arise concerning PSC's proposed employee screening program, please contact Mr. Don Warembourg (303) 786-2223, ext. 200 or Mr. Milt McBride (303) 785-2223, ext. 202

Very truly yours,

  
Oscar R. Lee

ORL/skr