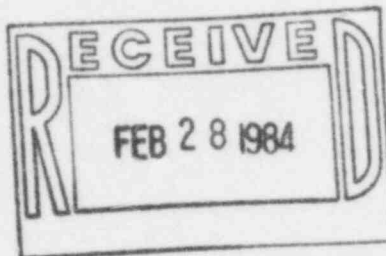




## Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651



February 22, 1984  
Fort St. Vrain  
Unit No. 1  
P-84056

Mr. John T. Collins, Regional Administrator  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, TX 76011

SUBJECT: I & E Inspection Report 83-28

REFERENCE: NRC Letter dated January 25, 1984

Dear Mr. Collins:

This letter is in response to the Notice of Deviation received as a result of inspections conducted at Fort St. Vrain during the period November 28 through December 2, 1983. The following response to the items contained in the Notice of Deviation is hereby submitted:

A. Designation of Person Responsible for Low-Level Waste Transportation Activities

NRC Inspection and Enforcement (IE) Bulletin No. 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," dated August 10, 1979, required a response by the licensee on activities and actions taken to ensure that low-level waste is properly packaged and transported in accordance with NRC and DOT regulations. Item 3 of the subject IE Bulletin requires the licensee to: "Designate, in writing, people in your organization who are responsible for the safe transfer, packaging and transport of low-level radioactive material." In an October 9, 1979, response to the Bulletin (letter from C. K. Millen, Public Service Company of Colorado, to K. V. Seyfrit, NRC), Subject: (same as IE Bulletin 79-19), the licensee stated "Item 3: The designation of personnel responsible for the handling of low-level radioactive material is designated in writing in Plant Administrative Procedure 21".

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In deviation from the above, the NRC inspector determined during NRC Inspection 50-267/83-28, that the aforementioned plant procedure no longer exists, and that current licensee documents do not provide adequate identification of personnel that are responsible for radioactive material transportation activities at Fort St. Vrain as required by IE Bulletin No. 79-19. (267/8328-01)

B. Transportation Activities Retraining

NRC IE Bulletin No. 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," dated August 10, 1979, required in Item 5 that the licensee provide training and periodic retraining in DOT and NRC regulatory requirements pertaining to transport of radioactive materials. In NRC Inspection Report 50-267/82-21 it was noted that a suitable training and retraining program did not exist (Open Item 267/8221-03). This open item was closed-out in NRC Inspection Report 50-267/83-11 based on the licensee's implementation of a suitable training and retraining program as set forth in Radiation Protection Administrative Procedure, "Radiation Protection Department Experience, Qualification, and Training Requirements" (Revision 5, dated March 28, 1983), and Training Program Administrative Manual - Radiation Protection (TPAM-RP) 6, "Radiation Protection Department Training Program."

In deviation from the above, the NRC inspector determined during NRC Inspection 50-267/83-28 that TPAM-RP 6 had been revised and changed to TPAM-RP 9, Issue 2, dated November 7, 1983, and that the specific requirements for the yearly retraining of personnel involved in radioactive material transport activities had been deleted. (267/8328-02)

(1) The corrective steps which have been taken and the results achieved:

- A. Radiation Protection Administrative Procedure RPAP-4, "Radiation Protection Plan," Issue 2, was effective January 25, 1984. This issue of the procedure designates the person responsible for low-level waste transportation activities; specifically, the Radiation Protection Manager, Mr. R. Baer of your staff is on controlled distribution for this procedure.

B. Training Programs Administrative Manual - Radiation Protection (TPAM-RP), Issue 3 was effective December 1, 1983. This issue of the procedure contains the requirement for yearly retraining of personnel involved in low level radioactive material transport activities. This revision to the procedure was made while Mr. Chaney was on site and the procedure revision was verified by Mr. Chaney during the inspection.

- (2) Corrective steps which will be taken to avoid further violations:

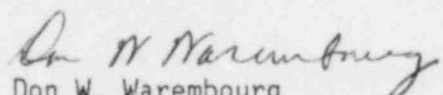
Radiation Protection Administrative Procedure RPAP-4, "Radiation Protection Plan," will be revised to include an administrative control section designed to "flag" commitments made either externally (eg: to the NRC, INPO, etc.) or internally to PSC involving Radiation Protection procedures, to ensure that the commitments are not inadvertently deleted in subsequent procedure issuance.

- (3) The date when full compliance will be achieved:

May 1, 1984.

Should you have any further questions, please contact Mr. F. J. Borst, (303) 571-7436, ext. 203.

Very truly yours,

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

DWW/djc