



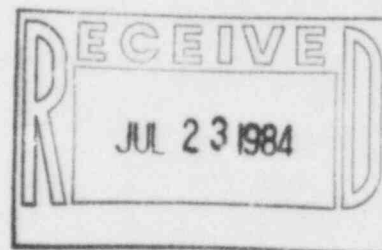
Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

50-267

July 19, 1984
Fort St. Vrain
Unit #1
P-84226

Mr. E. H. Johnson, Chief
Reactor Project Branch 1
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



SUBJECT: NUREG-0737, Item I.C.1

REFERENCE: G-84178, E. H. Johnson
to O. R. Lee, dated
May 31, 1984

Dear Mr. Johnson:

We are in receipt of your letter of May 31, 1984 (G-84178), and have reviewed your "Request for Information."

Our Emergency Procedures (EPs) were reformatted and revised relative to the requirements of NUREG-0737 in November, 1981. Subsequent to those revisions, the NRC stated in G-82084 (March 24, 1982; R. A. Clark to D. W. Warembourg) that "these procedures are being reviewed by ORNL and NRC to determine their completeness and comprehensiveness to the plant operators. Upon favorable completion of the review, this item will be closed."

ORNL completed that review February 11, 1982, and presented the results to the NRC February 16, 1982 (S. J. Ball to D. G. Eisenhower). In May, 1982, Public Service Company revised the Emergency Procedures (Issue 50) responding to both the ORNL comments and comments of the NRC Emergency Preparedness Appraisal Audit (G-82163, dated June 11, 1982; Collins to Lee). Public Service Company transmitted an item-by-item response to the ORNL comments to the NRC on August 24, 1984 (P-82344, Warembourg to Kuzmycz). In that correspondence, we requested that Item I.C.1 of NUREG-0737 be closed. Since that time, the NRC issued Generic Letter 82-33 (December 17, 1982), Supplement 1 to NUREG-0737.

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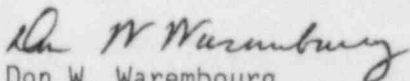
Public Service Company reviewed Generic Letter 82-33, and on April 14, 1983, provided response to the NRC (P-83147, Lee to Denton). In that response, Public Service Company stated that, based upon our response to NUREG-0737 and ORNL/NRC comments, we felt that we had met the intent of I.C.1 and Supplement 1, unless other issues (e.g., Control Room Design Review) necessitated revision to our Emergency Procedures.

In early 1984, several telephone discussions between Public Service Company and the NRC staff were held with the objective of removing obstacles to closing NUREG-0737, Item I.C.1. At the conclusion of those conversations, it was our impression that Item I.C.1 would be closed in the near future. On May 31, 1984 (via G-84178) we were subsequently advised that additional information would be required to close out Item I.C.1 (i.e., a Program Generation Package).

My staff has reviewed the aforementioned correspondence in detail and see's merit in many of its recommendations with regard to improving clarity and consistency. These items will be reflected in subsequent updates to the EPs. Public Service Company does, however, request that implementation of a detailed Program Generation Package be delayed until completion of the pre-implementation audit of the Detailed Control Room Design Review (DCRDR). Changes to the format, style, and training of the EPs may be necessitated as a result of the DCRDR and would be undertaken at that time. Additionally, we request that Item I.C.1 be closed and that development of a Program Generation Package be carried as part of the DCRDR.

If you have questions regarding this matter, please contact Mr. Chuck Fuller at (303) 785-2223.

Very truly yours,


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

DWW/djc

cc: Fuller