



PUBLIC SERVICE COMPANY OF COLORADO

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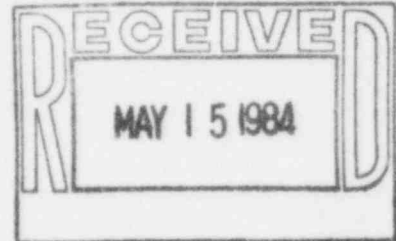
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16805 WCR 19 1/2, Platteville, Colorado 80651

OSCAR R. LEE
VICE PRESIDENT

May 10, 1984
Fort St. Vrain
Unit #1
P-84136

Mr. John T. Collins, Regional Administrator
Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, TX 76011



Docket No. 50-267

SUBJECT: Proposed Technical Specification
Changes to Section 5.3.7

REFERENCES: (1) P-84112 (Warembourg to
Wagner, Dated April 16, 1984)

Dear Mr. Collins:

This letter is to propose a change to Section 5.3.7 of the Fort St. Vrain Technical Specification (Attachment 1). This change proposes that a more conservative limit be imposed on the monitoring of secondary coolant activity.

The two major changes embodied in the proposal are as follows:

- 1) We propose to eliminate the requirement that daily sampling of secondary coolant commence if "the secondary coolant activity level increases by a factor of 25% over the previous equilibrium value at the same reactor power level". Normal secondary coolant activity levels at 70% power are approximately 0.01% of the limit of LCO 4.3.8 and ¹³¹I has never been identified. At these low activity levels we have found that ³H concentrations are not a function of reactor power but rather a function of secondary coolant makeup configuration/source. Therefore it is normal for secondary coolant activity to vary from 15% below to 40% above the average at a given constant power level, depending on the ³H concentration of the makeup configuration/source. This makes it very hard to establish an equilibrium value, and any value established does not perform its intended function of alerting operations personnel to significant increases in secondary coolant activity. This condition is not indicative of a primary to secondary leak since ³H concentrations in secondary coolant occur as a result of diffusion through the steam generator tubes.

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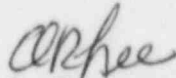
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- 2) We propose to reduce the action level at which the frequency for sampling and analysis is increased. Upon reaching a secondary coolant activity level of 10% of the safety limit of LCC 4.3.8 (presently 25%), the frequency of sampling and analysis would be increased from weekly to daily and would continue on a daily basis until the activity level decreased to less than 10% of the limit of LCO 4.3.8. We feel that placing our action level at 10% of the limit will allow us to more closely monitor the radiological status of the secondary coolant system, thereby assuring that exposures to plant workers and the general public, as well as material decontamination and waste disposal, are maintained as low as reasonably achievable (ALARA).

As stated in Attachment 2, the proposed requirements are considered more restrictive and are deemed to involve no significant hazards considerations. Therefore, in accordance with 10 CFR 170, these changes are believed to be Fee Class III, and a check in the amount of \$4,000.00 is enclosed.

If you have any questions, please contact Mr. Don Warembourg at (303) 785-2224.

Very truly yours,


O. R. Lee
Vice President
Electric Production

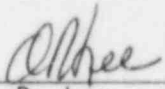
Attachments

cc: A. J. Hazle,
Colorado Department of Health

ORL/djm

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

O. R. Lee, being first duly sworn, deposes and says; That he is Vice President of Electric Production of Public Service Company of Colorado, the Licensee herein; that he has read the foregoing Application for Amendment to Appendix A of Facility Operating License and knows the contents thereof, and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

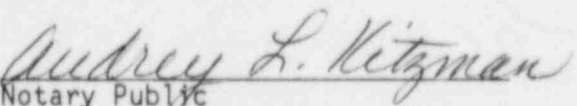


O. R. Lee

Subscribed and sworn to before me this 10th day of May, 1984.

Witness my hand and official seal.

My commission expires: 11-29-87.



Notary Public