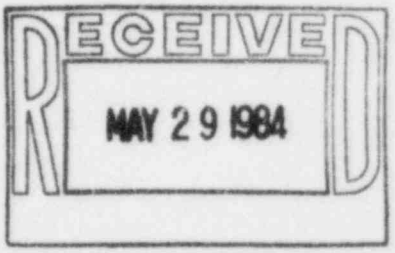
Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

50-267

May 25, 1984
Fort St. Vrain
Unit #1
P-84155



Mr. E. H. Johnson, Chief
Reactor Project Branch 1
Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, TX 76011

SUBJECT: FORT ST. VRAIN ELECTRICAL SYSTEM TECHNICAL SPECIFICATIONS

REFERENCES:
(1) PSC Letter, Lee to Collins, Dated 12-30-83 (P-83415)

(2) NRC Letter, Johnson to Lee, Dated 4-30-84 (G-84137)

(3) NRC Letter, Tedesco to Warembourg, Dated 8-25-80 (G-80149)

(4) PSC Letter, Warembourg to Collins, Dated 3-09-84 (P-84078)

Dear Mr. Collins:

In a recent correspondence (Reference (2)), the Nuclear Regulatory Commission indicated that Public Service Company of Colorado (PSC) failed to address required model Technical Specifications given in Reference (3). A number of telephone conversations have taken place between members of my staff and Mr. Phil Wagner since the receipt of Reference (2), and from those conversations, it appears that a great deal of confusion exists over the content of the Technical Specification amendment proposed in Reference (1). This letter serves to clarify PSC's position on the stated issues.

A005
1/0

The first issue requiring clarification is that concerning the inclusion of setpoint and surveillance requirements associated with the loss of power undervoltage relays on the 480V AC essential busses. The amendment proposed in Reference (1) did include requirements comparable to those given in Reference (3) for the loss of voltage scram relays. As proposed, Table 4.4.1-1 and associated LCO 4.4.1 notes would be modified to reflect changes in the loss of voltage scram circuitry resulting from the recent electrical system upgrade, and Table 5.4-1 would be modified to include calibration requirements for the loss of voltage scram relays themselves.

Setpoint and surveillance requirements for the 480V AC essential bus automatic throw over (ATO) relays and the degraded voltage and loss of voltage automatic diesel generator start relays described in the Safety Analyses provided with Reference (1) were not proposed, however. This is due to an apparent misunderstanding involving Mr. Don Brinkman of the NRC's Standard Technical Specifications branch.

During development of the amendment proposed in Reference (1), Mr. Phil Wagner recommended that NUREG 0452, Revision 4 (the most current version of the Westinghouse (W) Standard Technical Specifications (STS)) be used as a model and referred us to Mr. Brinkman to obtain a copy of the document. Mr. Brinkman indicated that it would be impractical to provide the entire document and sent what PSC understood to be all sections associated with the electrical system requirements in the W STS. Since none of these sections included setpoints or surveillance requirements for auxiliary relaying associated with equivalent systems to the Fort St. Vrain 480V AC essential busses, specifications such as those indicated in Tables 3.3-3, 3.3-4, and 4.3-2 of Enclosure 2 to Reference (3) were assumed to no longer be a required part of the STS. Specifications associated with the auxiliary relaying were, therefore not included in the proposed amendment. Telecons with Mr. Wagner following the receipt of Reference (2) revealed that such specifications were indeed a required part of the STS but for some reason were not included in the package received by PSC from Mr. Brinkman.

The second issue requiring clarification is that concerning the inclusion of the diesel generator testing requirements comparable to those in the model Technical Specifications provided in Reference (2). The diesel generator testing requirements proposed in Reference (1) were developed using NUREG 0452, Revision 4 and did include comparable requirements to those in the model Technical Specifications. The only basic difference is that the model Technical Specification requires (in part) each diesel generator to be demonstrated operable at least once per eighteen months during shutdown by:

> "Simulating a loss of offsite power in conjunction with a safety injection actuation test signal, and:
>
> > ... Verifying that on diesel generator trip, the loads are shed from the emergency busses and the diesel re-starts on the auto-start signal, the emergency busses are energized with permanently connected loads, the auto-connected emergency loads are energized through the load sequencer and the diesel operates for |mgte|x 5 minutes while its generator is loaded with the emergency loads."

This requirement was omitted from the proposed amendment because the automatic actions described are not design features of the Fort St. Vrain undervoltage relaying scheme upon a diesel generator trip. Such features have been determined not to be required at Fort St. Vrain due to the long response time allowed in association with the design basis accidents.

The final issue requiring clarification is that of omissions to Reference (1) that are expected to be included in the Plant Protection System (PPS) Technical Specification amendment request resulting from the overall PPS setpoint re-evaluation program (see Reference (4)). Statements made to Mr. Powers during his March 8, 1984, visit to Fort St. Vrain were made with respect to incorporating format requirements comparable to those provided in the model Technical Specifications (Reference (3)) into the loss of voltage scram relay setpoint and surveillance requirements. As mentioned above, the 480V auxiliary relaying specifications were thought at the time of Mr. Powers' visit to no longer be a required part of the STS. Only incorporation of the ISA-SP67.04-1982 standard type of format into the PPS Technical Specifications was to be delayed.

In a attempt to resolve the confusion surrounding the issues addressed above, PSC commits to the following:

1) A Technical Specification amendment request will be submitted by June 29, 1984, to supplement Reference (1) including set point and surveillance requirements associated with the loss of voltage and degraded voltage auxiliary relaying.

2) The requirements submitted as described above will be upgraded to incorporate ISA standard type format in conjunction with the PPS Technical Specification amendment request in January, 1985.

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

Very truly yours,

Don Warembourg
Manager
Nuclear Production

DWW/djm