UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

SAFETY EVALUATION BY THE NUCLEAR REGULATORY COMMISSION

RELATED TO AMENDMENT NO. 43 TO FACILITY OPERATING LICENSE DPR-34

PUBLIC SERVICE COMPANY OF COLORADO

FORT ST. VRAIN NUCLEAR GENERATING STATION

DOCKET 50-267

INTRODUCTION

By letter dated April 19, 1983, Public Service Company of Colorado (PSC or the licensee) submitted an application to amend the Fort St. Vrain (FSV) Technical Specifications (TS). The proposed changes would: 1) clarify a footnote for the reactor protection system (RPS) instrumentation tables (Tables 4.4-1 through 4.4-4 of LCO 4.4.1) to remove confusion, and 2) allow the use of alternate moisture monitoring instrumentation during low power operation (LCO 4.4.5). Following a detailed review of the submitted TS pages, we recommend some corrections and changes to clarify requirements and facilitate future operations. The licensee agreed with our recommendations and superseded that application with a new application dated March 14, 1984. This new application, in addition to including the above changes and correcting some editorial problems, provides for the use of temporary, compensatory measures to allow maintenance on the moisture monitoring instrumentation.

EVALUATION

The licensee's March 14, 1984 application proposed the following four areas of change to the FSV TS dealing with instrumentation and control systems:

1. Editorial Changes

   PSC proposed a correction to a typographical error in footnote (j) of Table 4.4-1 and to correct the FSAR references cited in LCOs 4.4.1 and 4.4.2. These changes were reviewed and found to be acceptable, editorial corrections.

   Additional editorial changes were required because page numbers of some proposed TS pages, submitted with the application, were inconsistent with the existing page numbering. We corrected this problem by renumbering the existing pages in an effort to improve the formatting of this section of the TS. We also corrected the numbering of LCO 4.4.3.

2. Moisture Monitor Maintenance

PSC proposed the use of compensatory measures in the form of a dedicated observer monitoring alternate moisture monitoring instrumentation and primary coolant pressure instrumentation while allowing the reactor protective system (RPS) moisture monitors (dew-point monitors) to be out of service for corrective maintenance. The proposed compensating provisions are similar to the operating condition allowed by LCO 4.9.2, "Plant Protective System Dew Point Moisture Monitoring Tests During Phase 2." (These tests involve the injection of moisture-laden gas into the primary coolant to verify the proper operation of the monitoring instruments.) In addition, a temporary (10-day) change was made to the TS by Amendment 31, which was issued on January 20, 1983, that allowed continued plant operation during maintenance of the dew-point monitors provided compensatory measures similar to those proposed were taken. Since this change is in accordance with previously approved conditions of operation, is limited to short periods of time (72 hours) to allow maintenance on the monitors, and acceptable levels of protection will be provided by the required compensatory measures during the periods of inoperability, we find it to be acceptable.

3. Clarification of footnote (f)

Footnote (f) of Table 4.4-1 states, "The inoperable channel must be in the tripped condition, unless the trip of the channel will cause the protective action to occur." This statement had been misinterpreted by operating personnel as allowing continued plant operation without the required instrumentation and was reported in Reportable Occurrence 83-001 which was transmitted by letter dated January 17, 1983. In an effort to remove any confusion, PSC proposed some additional wording in the April 19, 1983 application. Following discussions with the NRC Project Manager, PSC agreed to further clarify the intent of the footnote and provided that clarification in this application.

We have reviewed this change and have determined that it will better define the correct operator action in the event of out-of-service instrumentation and, therefore, find it to be an acceptable administrative change.

4. Low Power Moisture Monitoring

The present LCO 4.4.5, "Analytical System Primary Coolant Moisture Instrumentation," is worded in such a way that only two of the analytical monitors were considered to be acceptable in fulfilling the requirements. This condition is discussed in IE Inspection Report No. 82-31, dated January 21, 1983, and is considered an unresolved item (8231-01). PSC proposed a change to LCO 4.4.5, in accordance with the agreement stated in the above Inspection Report,

which allows the use of alternate moisture monitoring instrumentation. The alternate monitors can be either the analytical instrument installed in the analytical instrumentation panel or the RPS dew-point monitors.

We have reviewed this change and found it acceptable because the moisture limitations are not being changed and acceptable levels of moisture monitoring will be provided to ensure that moisture levels can be adequately determined to comply with the limitations.

ENVIRONMENTAL CONSIDERATION

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: June 5, 1984

The following NRC personnel have contributed to this Safety Evaluation:
Philip C. Wagner