

Public Service Company of Colorado

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June 22, 1984 Fort St. Vrain Unit #1 P-84186

JUN 2 7 1984

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

> SUBJECT: Confirmation of Telecon on June 14, 1984

- REF: (1) PSC Letter, Warembourg to Johnson, dated 5-25-84 (P-84155)
 - (2) PSC Letter, Warembourg to Eisenhut, dated 3-30-84 (P-84101)
 - (3) PSC Letter, Lee to Collins, dated 12-15-83 (P-83403)
 - (4) PSC Letter, Lee to Collins, dated 12-30-83 (P-83415)

Dear Mr. Johnson:

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This letter confirms a telephone conversation on June 14, 1984 between Messrs. Novachek and Fuller of my staff and Mr. Wagner of your staff. The subjects of discussion were the upcoming submittal of proposed supplemental changes to the Fort St. Vrain Electrical Technical Specifications (Ref. 1), the future submittal of NUREG-0737 associated Technical Specifications (Ref. 2), and the submittal of proposed changes to LCO 4.1.9 (Ref. 3).

As you are aware, the batteries which we have recently installed at Fort St. Vrain far exceed the ampere-hour capacity required by the FSAR. As a result the DC loads on the corresponding busses are insufficient to fully discharge the battery within the time frame allotted by the model technical specifications for full discharge testing. For this reason, section d) on page 5.6-10 of the associated SR 5.6.2 which was submitted in Reference 4 for Fort St. Vrain required a partial discharge of station batteries to confirm

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the FSAR-required capacity. Since the possibility for differences in interpretation of the specifications existed, we brought this matter to Mr. Wagner's attention. Mr. Wagner stated that he would discuss the situation with the reviewers of the submittal.

By way of Reference 2, Public Service Company committed to submit technical specification changes to address some NUREG-0737 requirements by June 29, 1984. Specifically, these submittals would revise the Fort St. Vrain Technical Specifications to include: (1) a change to the administrative section to reference maintenance of the Post Accident Sampling System (PASS) Program; (2) the addition of a reactor building area radiation monitor to LCO 4.4.3; (3) the addition of an LCO for the Three-Room Complex HVAC fans; and (4) the addition of an LCO and SR for the chlorine detector. The remaining NUREG-0737 item deals with the installation of testable HEPA filters which is scheduled for later this year as stated in Reference 2.

Due to a number of issues which face us in the immediate future (e.g., rise-to-power, physics testing, radiological emergency exercise preparations, etc.), Public Service Company requested an extension of the above-mentioned submittals from June 29, 1984, to July 31, 1984. For your information, the PASS is installed, and procedures for its use are issued. The referenced reactor building area radiation monitor is installed, calibrated, and operational. System Operating Procedures and LCO's are in place to govern the operation of the Three-Room Complex HVAC as a system (although there is not a separate LCO for the fans, specifically). Similarly, the chlorine detector is installed and operational.

Based on the fact that these systems and programs are in place, and on the fact that the associated technical specification changes will be either administrative in nature or will formally incorporate existing systems or programs, we believe there is adequate justification for extending the submittal date to July 31, 1984. Mr. Wagner indicated he would consider this request.

The last item discussed was the request for response to questions concerning our proposed changes to LCO 4.1.9. Due to the complexity of this issue, Public Service Company proposed that a meeting be held in Arlington to discuss the submittal rather than attempting to provide a written response at this time. Our wish would be to have this meeting be on an informal basis, rather than a formal presentation. Mr. Wagner was agreeable to this approach and a meeting was tentatively scheduled for June 28, 1984. If you have any questions on these items, or if our understanding of the telephone conversation is not in agreement with yours, please let me know.

Very truly yours,

Don Warembourg by milt mcBride

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

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