

Public Service Company of Colorado

P.O. BOX 840 - DENVER COLORADO 80201 2420 W. 26th Avenue, Suite 100D, Denver, CO 80211

> September 20, 1984 Fort St. Vrain Unit No. 1 P-84373

50-267

Regional Administrator, Region IV U. S. Nuclear Regulatory Commission 611 Ryan Plaza Drive Suite 1000 Arlington, TX 76011

Attention: Mr. Eric Johnson

OCT - 5 1984

SUBJECT: Proposed FSV Wastewater Treatment

System

Dear Mr. Johnson:

This letter is written in response to the questions raised by the NRC in phone conversations in mid August concerning Public Service Company of Colorado's proposed modifications to the Fort St. Vrain wastewater treatment plant.

Presently sanitary waste system effluent is treated in a package sewage aeration plant consisting of an aeration unit, clarifier, and chlorine contact station unit. From this plant the effluent flows by gravity down into a polishing oxidation pond for settlement. From there it is released into the Goosequill Ditch to eventually flow into the South Platte River. The present wastewater system was originally designed to handle approximately one-hundred sixty people. As more plant personnel have been added, the system has become increasingly overloaded. The situation is especially bad when contractor personnel are working on site. The Colorado Department of Health (CDH) has been concerned about this situation for some time.

In 1983 PSC had to renew FSV's National Pollutant Discharge Elimination System (NPDES) permit. The FSV was tewater system became an issue with the CDH. PSC was asked to resolve the concern with the existing FSV was tewater treatment system at that time.

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Acting upon a recommendation from a consulting firm hired to evaluate the treatment of domestic waste water at FSV, PSC decided to install an aerated lagoon treatment process in place of the present treatment process. CDH concurred with this decision. In the process of renewing the NPDES permit, PSC has committed to the CDH to provide this aerated lagoon system.

The proposed system will continue to pipe the wastewater into the existing aeration plant. However, the only treatment the wastewater will now receive as it flows through this plant is aeration. By gravity the wastewater will then flow first into the two cells of one lagoon where it will receive further aeration. From there it flows into a second lagoon, a polishing pond. From the second lagoon, the wastewater flows into an outlet structure where chlorination takes place. From there it will flow, as it does now, into Goosequill Ditch and down to the South Platte River. This system will handle the wastewater from four-hundred and one people.

This activity will assure PSC's compliance with water quality regulations. The EPA's Regulations on Criteria and Standards for the NPDES, 40CFR125.3(e), states that "Technology based treatment requirements cannot be satisfied through the use of 'non-treatment' techniques such as flow augmentation and in-stream mechanical aerators." The proposed new wastewater treatment system complies with this requirement.

All measurable nonradiological effects of this activity are confined to an on-site area inside the original construction area previously disturbed during site preparation. The new lagoons will be constructed in the same area where the existing pond is situated. The new treatment system continues to chlorinate the wastewater as noted in the Final Environmental Statement. There will be no measurable effects on the environment due to chlorine concentration in the water since the chlorine concentration will be maintained below the state regulations as stated in the NPDES.

There will be no change in the type or amount of effluent released from the site. The system will be handling the same amount of wastewater as did the previous system. Only the method of dealing with the wastewater is changed. With this modified treatment system, FSV will have better control over and less maintenance of the treatment system.

The activity does not involve an unreviewed environmental question, since the actual construction area will be confined to an on-site area, the effluent discharge to the South Platte River will not be changed, and the activity is assuring PSC's compliance with EPA water quality regulations. Since this activity does not constitute an unreviewed environmental question, prior NRC approval is not necessary, and an NRC evaluation under the provisions of 10CFR51 does not appear to be required.

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If you have any questions, please call M. H. Holmes at (303) 571-8409.

Very truly yours,

H. L. Brey Executive Staff Assistant, Electric Production

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