

DMB

OCT 15 1984

In Reply Refer To:
Docket: 50-267

Public Service Company of Colorado
ATTN: O. R. Lee, Vice President
Electric Production
P.O. Box 840
Denver, Colorado 80201

Dear Mr. Lee:

We have reviewed Revision 2 to the Fort St. Vrain Updated Final Safety Analysis Report (UFSAR) which you submitted by letter dated July 20, 1984, in accordance with 10 CFR 50.71(e). Our review has disclosed a number of instances in which the revision is not in compliance with 10 CFR 50.71(e)(5) which states that "Each replacement page shall include both a change indicator for the area changed, . . . and a page change identification" There are numerous editorial changes which are not identified and none of the changes to the Tables or Figures have change indicators. The more significant omissions are detailed, together with our other questions and comments, in the enclosure to this letter.

We request that you respond to our questions and comments within 30 days of your receipt of this letter. If you have any questions on this subject, please contact the NRC Project Manager.

Since this reporting requirement relates solely to the Fort St. Vrain Station, OMB clearance is not required under PL 96-511.

Sincerely,

Original Signed By
E. H. Johnson

E. H. Johnson, Chief
Reactor Project Branch 1

Enclosure:
UFSAR Revision 2 Comments

cc:
(cont. on next page)

SPES *aw*
PCWagner/lk
10/11/84

SPES *REI*
REIreland
10/12/84

RPB1 *EH*
EHJohnson
10/12/84

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PDR ADOCK 05000267
P PDR

71005
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J. W. Gahm, Nuclear Production Manager
Fort St. Vrain Nuclear Station
P.O. Box 368
Platteville, Colorado 80651

L. Singleton, Quality Assurance Manager
(same address)

C. K. Millen, Senior Vice President
Public Service Company of Colorado
P. O. Box 840
Denver, Colorado 80201

Mr. David Alberstein, 14/159A
GA Technologies, Inc.
P. O. Box 85608
San Diego, CA 92138

Albert J. Hazle, Director
Radiation Control Division
Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Kelley, Stansfield & O'Donnell
Public Service Company Building
550 15th Street, Room 900
Denver, Colorado 80202

Chairman, Board of County Comm.
of Weld County, Colorado
Greeley, Colorado 80631

Regional Representative
Radiation Programs
Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80203

J. K. Fuller, Vice President
Public Service Company
Radiation Control Division
4210 East 11th Avenue
Denver, Colorado 80220

bcc distrib. by RIV:

RPB1 Resident Inspector
RPB2 Section Chief (SPES)
EP&RPB P. Wagner, RPB1
RIV File D. Powers, RPB1
J. Collins, RA DRSP

D. Eisenhut, D/DL
G. Lainas, DL
J. Miller, ORB3
T. Colburn, ORB3
J. Taylor, IE
E. Jordan, IE

UFSAR Revision 2 Comments

<u>Section</u>	<u>Comment</u>
1.2.2.2	The acceptability of Building 10 and the walk-through structure are presently under NRC review.
2.2	The site size shows an increase from 2238 to 2798 acres. Review of Revision 2 of Figure 2.1-4 indicates additional property bordered by County Roads 34, 17, and 36 and the old boundary. Was this land recently purchased?
3.4	Reference 13 does not agree with the discussion on page 3.4-2.
3.8.1.1.2	The acceptability of the monitoring and reporting of the drive mechanism's temperatures are presently under NRC review.
4.3.4	The change indicates that a condensate pump <u>without</u> the emergency water booster pump is adequate to feed the steam generators. This change should be explained and justified.
6.8.2.2	The rupture disk pressures are still in disagreement with Figure 6.8-2.
Table 7.1-5	Although not a change, explain what is meant by "140% flow scram."
7.3.5.2	Item 8. Why were instrument Nos. 7325-1 and -2 changed to 73437-1 and -2?
7.4.3	The acceptability of the changes to the Instrument Power System are presently under NRC review.
8.2.2	The acceptability of the current limiting reactors (8.2.2.2) and the Instrument Power System (8.2.2.3) are presently under NRC review.
8.2.3.4	The change indicates that the batteries have a capacity of at least the old value without stating the actual battery ratings. All of the changes to the DC power system are presently under NRC review.
8.2.5.3.2	The acceptability of the implemented degraded grid protection system is presently under NRC review.
9.12.2.3	A new paragraph discusses a deluge system to protect the <u>essential</u> 4160/480 VAC load center transformers. Although the acceptability of the modifications to these transformers

are presently under NRC review, please explain their safety classification.

Why is the Halon concentration maintained at a minimum of 3% for 4 hours in all areas except Building 10 where it is $\geq 5\%$ for 20 minutes?

9.12.3.3 Why was the fire hose length decreased from 100 feet to 50 feet?

Are two fire detectors required to operate to actuate the Building 10 Halon system?

9.12.5.3 The NRC action referred to in Reference 6 was to state that an inadequate application had been submitted; therefore, NRC action is complete on the exemption requests.

10.1 What was changed in this section?

11.1.1 Two new paragraphs were added but not identified by the required change indicator.

11.2.2.6 This section indicates that access and egress for the Control Room is through the Turbine Building and the walk-through structure to Building 10. This later route is not allowable and will require prior NRC approval.

12.1.4 The discussions of key personnel will require revision due to recent reorganizations. These personnel and title changes should be formally described to the NRC.

12.3.5 The statement on page 12.3-13, that CDH retains overall responsibility for offsite incident assessment is misleading. PSC is the licensee and is, therefore, the responsible party.

14.5 Reference 8 is a letter from Wagner to Lee, not Wagner to Warembourg. The same comment is true for A.4, Reference 9 and A.16, Reference 16.

A.7.4.3 As emphasized in NRC letters dated January 3, 1979, and February 28, 1983, any modifications to the fuel element PIE program must be reviewed and approved by the NRC. We continue to maintain the position that PSC is required to perform various, committed-to, PIE regardless of the availability of DOE funding. Therefore, statements indicating otherwise are not correct.

A-13 Since the original FSAR is usually not available for review together with the UFSAR, the appropriateness of references to Figures in the original FSAR in lieu of providing them in the UFSAR should be reevaluated.

- C.11 A note stating that changes (which are not described) to the control room ventilation system alter the system operation, as described in the preceding discussion, appears to make the verification of conformance with GDC 11 of little value. Where are these changes described and how were they approved?
- C.24 The implemented modifications to the Instrument Power System are presently under NRC review to ensure compliance with GCD 24 and other NRC directives.
- C.70 The Note incorrectly refers to Amendment 27; the correct reference is Amendment 37.