

DMB

OCT 19 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 your July 31, 1984 (P-84246), letter concerning the fuel element inspection program you propose to have incorporated into the Fort St. Vrain (FSV) Technical Specification (TS). Based on this review, we have the following comments. First, it has been, and continues to be, our position that all of the various fuel element inspections which you have agreed to perform, should be described in the program incorporated into the TS. This would include, among others, the video inspection of the "canyon walls," the post irradiation examination (PIE) of selected elements from each reload, and the PIE of the Fuel Test Elements (FTEs). Secondly, it remains our position that these inspections must continue to be performed, in accordance with your commitments, regardless of whether they are included in the TS.

We are interested in including all of the various fuel element-related inspections to which you are committed into a single program for easier administration of requirements. The incorporation of this program into the TS provides the acceptable method of ensuring that the program is being properly implemented. The details of an acceptable concept for the proposed program to be incorporated into the TS, along with associated reporting requirements, have been discussed with members of your staff.

In addition, we would like to restate our position on your commitments for the PIE of selected fuel elements. As emphasized in our January 3, 1979, and February 28, 1983, letters, any modifications to the PIE program must be reviewed and approved by the NRC. Since our approval of some operations have been based on PIE verification, we do not find it acceptable for changes to be made to be made to the PIE program based only on the availability of DOE funding.

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

SPES *lw*
PCWagner/lk
10/4/84

SPES *RE*
REIreland
10/4/84

RPB1 *Z06*
EHJohnson
10/12/84

DRSP *[Signature]*
PSCheck
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Public Service Company of
Colorado

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If you have any questions on this subject, please contact the NRC Project
Manager, P. Wagner, at (817) 860-8127.

Sincerely,

E. H. Johnson, Chief
Reactor Project Branch 1

cc: (cont. on next page)

Public Service Company of
Colorado

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bcc distrib. by RIV:

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