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16805 WCR 19 1/2, Platteville, Colorado 80651

March 19, 1992
Fort St. Vrain
Unit No. 1
P-92115

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

ATTN: Dr. Seymour H. Weiss, Director
Non-Power Reactor, Decommissioning and
Environmental Project Directorate

Docket No. 50-267

SUBJECT: DECOMMISSIONING TECHNICAL SPECIFICATIONS

REFERENCE: PSC Letter, Crawford to Weiss, dated August
30, 1991 (P-91278)

Dear Dr. Weiss:

This letter submits a proposed amendment to the Fort St. Vrain (FSV) Facility License and Technical Specifications, to provide controls and limits appropriate for FSV decommissioning. This submittal reflects several administrative changes to the proposed Facility License and Decommissioning Technical Specifications (DTS) that Public Service Company of Colorado (PSC) previously submitted to the NRC via the referenced letter.

The administrative changes reflected in the attached submittal were identified during PSC's decommissioning planning efforts, and include the following:

- Revisions to management position titles to reflect a revised organizational structure,
- Revision of the high radiation area definition to allow use of either the existing 10 CFR 20 criteria or the revised 10 CFR 20 criteria,

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- Extension of the time allowed to submit the Semiannual Radioactive Effluent Release report from 60 to 90 days, and
- Revision to the Facility License requirements to explicitly permit receipt of radioactive material produced during previous plant operations or during decommissioning activities.

The submittal of these proposed changes is included in the following attachments:

- Attachment 1 - Summary of Proposed Changes
- Attachment 2 - Proposed Facility License and Decommissioning Technical Specifications
- Attachment 3 - Justification of Changes from Previously Submitted Facility License and Decommissioning Technical Specifications
- Attachment 4 - No Significant Hazards Consideration Analysis

Attachment 2 includes the proposed Facility License and Decommissioning Technical Specifications in their entirety. This attachment is intended to totally supersede and replace PSC's previously referenced submittal. To assist in your review, changes from the referenced submittal have been marked in the left-hand margin and are explained in Attachment 1.

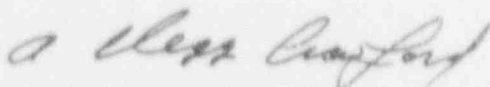
The No Significant Hazards Consideration Analysis has been revised to address the steam generator primary module drop accident. This accident was identified during the response to NRC questions on the Proposed Decommissioning Plan. The identification and analysis of this accident did not result in any changes to the DTS limiting conditions or surveillance requirements because the accident analysis does not take credit for reactor building confinement or filtration by the ventilation exhaust system.

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PSC requests that the proposed Facility License and Decommissioning Technical Specifications be approved for implementation at the beginning of decommissioning activities, after all nuclear fuel has been removed from the Reactor Building and after the NRC has approved the Proposed Decommissioning Plan. The attached DTS are intended to replace the current FSV Technical Specifications and Environmental Protection Plan (Non-Radiological), Appendices A and B, respectively, to the FSV Facility Operating License.

If you have any questions regarding these proposed changes, please contact Mr. M. H. Holmes at (303) 620-1701.

Very truly yours,



A. Clegg Crawford
Vice President
Electric Production

ACC/SWC/lmg

Attachments

cc: Regional Administrator, Region IV

Mr. J. B. Baird
Senior Resident Inspector
Fort St. Vrain

Mr. Robert M. Quillin, Director
Radiation Control Division
Colorado Department of Health