

Public Service

Public Service
Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

April 14, 1992
Fort St. Vrain
Unit No. 1
P-92159

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: Additional Information Regarding Proposed
Amendment to Facility Operating License and
Administrative Controls Technical Specifications

REFERENCE: PSC Letter, Crawford to Weiss, dated
December 20, 1991 (P-91435)

Dear Dr. Weiss:

This letter provides additional information in support of the December 20, 1991, proposed amendment to the Fort St. Vrain (FSV) Facility Operating License and Technical Specifications, submitted via the referenced letter. This submittal is based on discussions between Public Service Company of Colorado (PSC) and the NRC Project Manager, Mr. Peter Erickson.

The information provided in the attachments withdraws the proposed changes to plant staffing and qualification requirements in Administrative Controls (AC) 7.1.1.4 and 7.1.1.5.a. These specifications have been restored to the requirements in the existing FSV Technical Specifications, so that staff qualifications will remain in accordance with ANSI N18.1 as long as the existing Technical Specifications are in effect. For completeness, the attachments include the entire amendment proposal provided in the referenced letter, and no changes other than the changes to AC 7.1.1.4 and 7.1.1.5.a have been made.

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As in the previous submittal, the attached amendment proposal includes the following organizational changes and program reductions:

- Revise management titles to reflect the current organization.
- Delete programs that will not be necessary after all nuclear fuel has been removed from the PSV Protected Area (e.g., Fire Brigade, licensed operators, and the physical security plan).
- Delete requirements for Technical Advisors.
- Delete the requirement for the Monthly Operating Report.
- Add controls for High Radiation Areas.

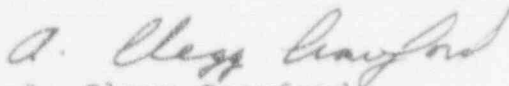
The submittal of these proposed changes is included in the following attachments:

- Attachment 1 - Summary of Proposed Changes
- Attachment 2 - Proposed Changes
- Attachment 3 - No Significant Hazards Consideration Analysis

PSC requests NRC approval of the attached proposed Technical Specification amendment as soon as reasonably possible, to support a smooth transition to the administrative controls that will be in effect during the decommissioning of Fort St. Vrain.

If you have any questions concerning this submittal, please contact Mr. M. H. Holmes at (303) 620-1701.

Very truly yours,



A. Clegg Crawford
Vice President
Electric Production

ACC/SWC/lmg

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cc: Regional Administrator, Region IV

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

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)
)
Public Service Company of Colorado) Docket No. 50-267
Fort St. Vrain Unit No. 1)

AFFIDAVIT

A. Clegg Crawford, being first duly sworn, deposes and says: That he is Vice President, Electric Production, of Public Service Company of Colorado, the Licensee herein, that he has read the foregoing Application for Amendment to the Facility Operating License and Appendix A of the Facility Operating License, and knows the contents thereof, and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

A. Clegg Crawford

A. Clegg Crawford
Vice President
Electric Production

STATE OF COLORADO)
)
COUNTY OF DENVER)

Subscribe and sworn to before me, a Notary Public on this
14th day of April, 1992.

Delores Romero
Notary Public

My commission expires January 6, 1993.

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of the Facility Operating License)
of)
PUBLIC SERVICE COMPANY OF COLORADO)

Application for Amendment to
Appendix A of Facility Operating License
License No. DPR-34

OF THE
PUBLIC SERVICE COMPANY OF COLORADO
FOR THE
FORT ST. VRAIN NUCLEAR GENERATING STATION

This application for Amendment to the Facility
Operating License and Appendix A of the Facility
Operating License, License No. DPR-34, is
submitted for NRC review and approval.

Respectfully submitted,

PUBLIC SERVICE COMPANY OF COLORADO

By A. Clegg Crawford
Vice President
Electric Production

KELLY, STANFIELD & O'DONNELL
James K. Tarpey
Mark A. Davidson
Public Service Company Building
Denver, Colorado 80202

Attorneys for Applicant

ATTACHMENT 1

TO P-92159

SUMMARY OF PROPOSED CHANGES

Summary of Proposed Changes

<u>Specification</u>	<u>Changes</u>
License Condition 3	Revised to allow the physical security plan, guard training and qualification, and safeguards contingency plans to be terminated after all nuclear fuel has been removed from the Protected Area.
Section 7, All	Replaced "Manager, Nuclear Production and Station Manager" with "Defueling and Decommissioning Program Director and Station Manager".
Section 7, All	Replaced "Vice President, Nuclear Operations" with "Vice President responsible for nuclear activities".
7.1.1.2.b.1 p7.1-3	Revised requirements for shift crew composition. After all nuclear fuel has been removed from the FSV Protected Area, these requirements are deleted. Shift crew requirements remain unchanged until fuel has been removed from the FSV Protected Area.
7.1.1.2.b.3 p7.1-3	Revised the requirement that a licensed operator be present in the control room during all shutdown and refueling conditions. After all nuclear fuel has been removed from the Protected Area this requirement is deleted; the requirement is unchanged until that time. Also, deleted reference to the Technical Advisor.
7.1.1.2.b.6 p7.1-4	Revised the requirement that an operator or technician qualified in radiation protection procedures be on site whenever fuel is on site. The applicability of this requirement was clarified to ensure that an operator or technician qualified in radiation protection procedures is on site whenever nuclear fuel is within the Protected Area and during physical activities involving radioactively contaminated systems or equipment.
7.1.1.2.b.7 p7.1-4	Revised to state that a Fire Brigade is not required after all nuclear fuel has been removed from the Protected Area.

Summary of Proposed Changes (Continued)

<u>Specification</u>	<u>Changes</u>
7.1.1.2.b.10 p7.1-6	Deleted reference to the Superintendent of Operations. Also, added statement that RO and SRO licensing requirements do not apply after all nuclear fuel has been removed from the Protected Area.
7.1.1.2.b.12 p7.1-7	Deleted reference to the Technical Advisor. Also, added statement that control room command requirements do not apply after all nuclear fuel has been removed from the Protected Area.
Table 7.1-1 p7.1-8	Added note that licensed operators and a minimum shift crew composition are not required after all nuclear fuel has been removed from the Protected Area. Also, deleted reference to Technical Advisors.
7.1.1.3 p7.1-8a,8b	Deleted requirements for Technical Advisors.
7.1.1.5.a,b p7.1-8c	Replaced "Nuclear Training and Support Manager" with "Facility Support Manager".
7.1.1.5.b p7.1-8c	Added condition that the training program for the staff and the Fire Brigade is only required until all nuclear fuel has been removed from the Protected Area.
7.1.1.5.c p7.1-8c	Deleted Technical Advisor training requirements.
7.1.2.1 p7.1-9	Revised Plant Operations Review Committee membership titles to reflect FSV reorganization.
7.1.2.5.j p7.1-11	Revised Radiological Emergency Response Plan to Defueling Emergency Response Plan.
7.1.3.2 p7.1-13	Revised Nuclear Facility Safety Committee membership titles to reflect FSV reorganization.
7.4.a p7.4-1	Revised the requirement to have written procedures for "Refueling operations" to "Defueling activities".

Summary of Proposed Changes (Continued)

<u>Specification</u>	<u>Changes</u>
7.5.1.c p7.5-3,4	Deleted Monthly Operating Report requirements.
7.5.1.e p7.5-7	Revised requirements for the Semi-annual Radioactive Effluent Release Report to cover plant activities during the previous six months, versus during the previous six months "of operation".
7.8 p7.8-1,2	Added new controls for High Radiation Areas.