

ATTACHMENT 2

TO P-92159

PROPOSED CHANGES

This Attachment includes only
those pages with proposed changes.

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. , are hereby incorporated in the license. The licensee shall maintain the facility in accordance with the Technical Specifications.

- (3) Until all nuclear fuel has been removed from the Protected Area, the licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: Fort St. Vrain Security Plan, Fort St. Vrain Guard Training and Qualification Plan, and Fort St. Vrain Safeguards Contingency Plan. All plans are with revisions submitted through June 6, 1990 as supplemented by letter dated September 14, 1990. After all nuclear fuel has been removed from the Protected Area, these plans may be terminated.

(4) Introduction of New Natural Gas Sources

While spent fuel or radioactive graphite core components remain onsite, no new natural gas sources (i.e., sources other than those analyzed and found acceptable in the staff's Safety Evaluation in support of License Amendment No. 82) shall be introduced within 0.5 miles of the location where spent fuel or radioactive graphite core components are stored, for any purpose, unless the licensee submits and the NRC has reviewed and approved an analysis demonstrating that such natural gas will not present an unacceptable hazard to the spent fuel or to the radioactive graphite core components or to the equipment or systems needed to protect the spent fuel or radioactive graphite core components.

In accordance with this restriction, the opening of the 6-inch isolation valve leading to the 16-inch natural gas pipeline south of the plant, for any purpose other than short-term maintenance and surveillance activities with the 6-inch valve continuously manned by an operator who has been instructed to promptly close the valve in the event a pipeline rupture is observed or suspected, shall be considered a new natural gas source requiring analysis.

7.1 ORGANIZATION, REVIEW, AND AUDIT-ADMINISTRATIVE CONTROLS

Applicability

Applies to the lines of authority and responsibility for the operational safety of the facility, and the organization for periodic review and audit of facility operation.

Objectives

To define the principal lines of authority and responsibility for providing continuing review, evaluation, and improvement of the plant operational safety.

SPECIFICATION AC 7.1.1 - ORGANIZATION, ADMINISTRATIVE CONTROLS

1. RESPONSIBILITY

- a. The Defueling and Decommissioning Program Director and Station Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- b. The Shift Supervisor (or during his absence from the control room and Shift Supervisor's office, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President responsible for nuclear activities shall be reissued to all station personnel on an annual basis.

2. ORGANIZATION

a. Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

(1) Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels, including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.

(2) The Defueling and Decommissioning Program Director and Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

| (3) The Vice President responsible for nuclear
| activities shall have corporate responsibility
for overall plant nuclear safety and shall take
any measures needed to ensure acceptable
performance of the staff in operating,
maintaining, and providing technical support to
the plant to ensure nuclear safety.

(4) The individuals who train the operating staff
and those who carry out health physics and
quality assurance functions may report to the
appropriate onsite manager; however, they shall
have sufficient organizational freedom to ensure
their independence from operating pressures.

b. Unit Staff

| (1) Until all nuclear fuel has been removed from the
| Protected Area (as shown on Figure 6.3-2), each
on-duty shift shall be composed of at least the
minimum shift crew composition shown in Table
7.1-1.

(2) A licensed operator must be in the control room
at all times when fuel is in the reactor.

| (3) During shutdown and defueling conditions, until
| all nuclear fuel has been removed from the
| Protected Area, an individual with a valid RO
(or SRO) license shall be present in the control
| room.

(4) During the performance of reactor startup, reactor shutdown, and recovery from reactor trip, two licensed operators must be in the control room.

(5) All core alterations shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

(6) An operator or technician qualified in radiation protection procedures shall be present at the facility at all times that there is nuclear fuel within the Protected Area, and during any physical activities involving radiologically contaminated systems or equipment.

(7) Fire Brigade staffing requirements have been incorporated into the Fire Protection Program Plan. A Fire Brigade is not required after all nuclear fuel has been removed from the Protected Area.

(d) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on shift.

(9) If unusual circumstances arise requiring deviation from the above guidelines, such deviation shall be authorized by the Defueling and Decommissioning Program Director and Station Manager, his designee, or higher levels of management, and with documentation of the basis for granting the deviation. Controls shall be established such that excessive individual overtime hours have not been assigned. The paramount consideration in overtime assignment shall be that significant reductions in the effectiveness of operating personnel would be highly unlikely. Routine deviation from the above guidelines is not authorized.

Authorized deviations to the working hour guidelines shall be documented and available for review by the Nuclear Regulatory Commission.

(10) The Shift Supervisors, and the Operations Manager shall hold a Senior Reactor Operator's license. The Reactor Operators shall hold a Reactor Operator's license. These are minimum requirements after all nuclear fuel has been removed from the Protected Area.

(11) Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 7.1-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 7.1-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent. This provision also does not exclude the requirement for an SRO licensed individual to be in the control room at all times other than the shutdown conditions specified in Table 7.1-1.

(12) During any absence of the Shift Supervisor from the control room or Shift Supervisor's office while the unit is in Hot, Cold, or Refueling Shutdown, an individual with a valid SRO license or RO license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room or Shift Supervisor's office during all other conditions, an individual with a valid SRO license shall be designated to assume the control room command function. These are not requirements after all nuclear fuel has been removed from the Protected Area.

TABLE 7.1-1

MINIMUM SHIFT CREW COMPOSITION (c)

Position	Number of Individuals Required to Fill Position	
	During Hot, Cold, or Refueling Shutdown (a)	All Other Conditions
SS (SRO)	1	1
SRO	Not Required	1
RO	1	2 (b)
EO	1	1
AT	Not Required	1

SS - Shift Supervisor with a Senior Reactor Operator's License
 SRO - Individual with a Senior Reactor Operator's License
 RO - Individual with a Reactor Operator's License
 EO - Equipment Operator
 AT - Auxiliary Tender

NOTES

- a. Per Technical Specification definitions, Section 2.0.
- b. One of the two Reactor Operators may be an Equipment Operator with a valid RO license provided that the staffing requirement for Equipment Operators is being met by another individual qualified as an Equipment Operator.
- c. Licensed operators and a minimum shift crew composition are not required after all nuclear fuel has been removed from the Protected Area.

3. TECHNICAL ADVISORS

| These requirements have been deleted in their entirety.

4. UNIT STAFF QUALIFICATIONS

- a. The staffing of the plant shall be in accordance with American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants".
- b. Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for the comparable position, except for the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975.

5. TRAINING

a. A retraining and replacement training program for the facility staff shall be maintained under the direction of the Facility Support Manager, and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR 55.

b. Until all nuclear fuel has been removed from the Protected Area, a training program for the Fire Brigade shall be maintained under the direction of the Facility Support Manager, and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except for Fire Brigade training/drill sessions which shall be held at least once per calendar quarter.

Specification AC 7.1.2 - Plant Operations Review Committee
(PORC), Administrative Controls

The organization, responsibilities, and authority of the PORC shall be as follows:

1. Membership

The Plant Operations Review Committee shall be composed of the following:

| Chairman: Defueling and Decommissioning Program
| Director and Station Manager
| Deputy Program Director
| Facility Support Manager
| Radiation Protection Manager
| Operations Manager
| Defueling/Maintenance Manager
| Systems Engineering Manager
| Decommissioning Engineering Manager

2. Alternates

An alternate chairman and alternate members, if required, shall be appointed in writing by the PORC Chairman to serve in the absence of a chairman or a member; however, no more than two alternate members shall participate as voting members in PORC activities at any one time.

3. Meeting Frequency

The PORC shall meet at least once per calendar month and as convened by the Chairman or his designated alternate.

4. Quorum

A quorum shall consist of the Chairman or alternate Chairman, and four members including alternates.

5. Responsibilities

The PORC shall be responsible for:

- a. Review of all procedures required by Technical Specification 7.4(a), (b), (c), (d) and changes thereto, and any other proposed procedure or changes to approved procedures as determined by the Defueling and Decommissioning Program Director and Station Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering the evaluation and recommendations to prevent recurrence to the Defueling and Decommissioning Program Director and Station Manager and to the Chairman of the Nuclear Facility Safety Committee.
- f. Review of all Reportable Events.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations, and reports thereon as requested by the Chairman of the Nuclear Facility Safety Committee.
- i. Review of the Plant Security Plan and implementing procedures.
- j. Review of the plant Defueling Emergency Response Plan and implementing procedures.
- k. Review of the Fire Protection Program Plan and implementing procedures.

6. Authority

The PORC shall:

- a. Function to advise the Defueling and Decommissioning Program Director and Station Manager on all matters that affect nuclear safety.
- b. Recommend to the Defueling and Decommissioning Program Director and Station Manager in writing, approval or disapproval of items considered under 5.a through 5.d, above.
- c. Render determinations in writing with regard to whether or not each item considered under 5.a through 5.e above constitutes an unreviewed safety question.
- d. Provide immediate written notification to the Defueling and Decommissioning Program Director and Station Manager, and the Chairman of NFSC of disagreement between the PORC and the Defueling and Decommissioning Program Director and Station Manager; however, the Defueling and Decommissioning Program Director and Station Manager shall have responsibility for resolution of such disagreements pursuant to 6.a above.

7. Records

The PORC shall maintain written minutes of each meeting and copies shall be provided to the Defueling and Decommissioning Program Director and Station Manager, and Chairman of the Fort St. Vrain Nuclear Facility Safety Committee.

Specification AC 7.1.3 - Nuclear Facility Safety Committee (NFSC), Administrative Controls

The organization, responsibilities, and authority of the NFSC shall be as follows:

1. Function

The Nuclear Facility Safety Committee shall collectively have the competence required to review problems in the following areas:

- a. Nuclear Power Plant Operations
- b. nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy

e. Instrumentation and Control

f. Radiological Safety

Mechanical and Electrical Engineering

Quality Assurance Practices

and other appropriate fields associated with the unique characteristics of the nuclear power plant.

2. Members

The NFSC shall be composed of the following:

Chairman (As appointed - See Step 4)

Defueling and Decommissioning Program Director and Station Manager

Deputy Program Director

Nuclear Licensing Manager

Systems Engineering Manager

Decommissioning Engineering Manager

Quality Assurance Manager

Radiation Protection Manager

Safety and Security Director

Consultants, as required, shall be appointed in writing by the Vice President responsible for nuclear activities.

3. Alternates

Alternate members, if required, shall be appointed in writing by the Vice President responsible for nuclear activities, however, no more than two alternate members shall participate as voting members in NFSC activities at any one time.

4. Chairman

The Chairman and Alternate Chairman of the NFSC shall be appointed in writing by the Vice President responsible for nuclear activities and shall serve as members of the NFSC.

5. Consultants

Consultants shall be utilized as determined by the Chairman, NFSC, to provide expert advice to the NFSC.

6. Meeting Frequency

The NFSC shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

7. Quorum

A quorum of the NFSC shall consist of the Chairman or his designated alternate and a majority of the NFSC members including alternates. No more than a minority of the quorum shall have line responsibilities for operation of the facility.

8. Responsibilities

- a. The Nuclear Facility Safety Committee shall review:
 - (1) The safety evaluations for safety significant changes to procedures, equipment, or systems

personnel or an outside fire protection firm;

- (b) a biennial audit of the fire protection program and implementing procedures;
 - (c) a triennial fire protection and loss prevention inspection and audit utilizing an outside qualified fire consultant.
- (9) The Offsite Dose Calculation Manual and Process Control Program and implementing procedures at least once per 24 months.
 - (10) The Radiological Environmental Monitoring Program and the results thereof at least once per 12 months.
 - (11) The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21 Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975, at least once per 12 months.

9. Authority

The NFSC shall report to and advise the Vice President responsible for nuclear activities in those areas of responsibility specified in 8.a, 8.b and 8.c above.

10. Records

Records of NFSC activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NFSC meeting shall be prepared and forwarded to the Vice President responsible for nuclear activities within 30 days following each meeting.

- | b. After preliminary approval by the Vice President
| responsible for nuclear activities, the minutes
 shall be distributed to all NFSC members, and
 approved at the next NFSC meeting.

- | c. Reports of reviews encompassed by Section 8.a,
| above shall be forwarded to the Vice President
| responsible for nuclear activities, within 30 days
 following completion of the review.

- | d. Audit reports encompassed by Section 8.c, above
| shall be forwarded to the Vice President responsible
| for nuclear activities, and to the management
 positions responsible for the areas audited within
 30 days after completion of the audit.

7.2 SAFETY LIMITS, ADMINISTRATIVE CONTROLS

Applicability

Applies to the administrative procedures to be followed in the event that a safety limit is exceeded.

Objectives

To define the administrative procedures which will be followed in the event that a safety limit is exceeded.

Specification AC 7.2 - Action to be Taken if a Safety Limit is Exceeded, Administrative Controls

If a safety limit is exceeded, as defined in Specification SL 3.1 and 3.2, the following action shall be taken:

- a. The reactor will be shut down immediately and reactor operations shall not be resumed until approval is received from the NRC.
- b. The safety limit violation shall be reported to the Commission, the Defueling and Decommissioning Program Director and Station Manager, and to the Chairman, NFSC immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman, NFSC and the Defueling and Decommissioning Program Director and Station Manager within ten days of the violation.

7.4 PROCEDURES - ADMINISTRATIVE CONTROLS

Applicability

Applies to administrative procedures which will govern plant operations.

Objective

To ensure that written procedures will be maintained to define requirements for plant operation.

Specification AC 7.4 - Procedures, Administrative Controls

- a. Written procedures shall be established, implemented and maintained covering the activities referenced below:
1. The applicable procedures recommended in Appendix A of Safety Guide 33, November, 1972.
 2. Defueling activities.
 3. Surveillance and test activities of safety-related equipment.
 4. Security Plan implementation.
 5. Emergency Plan implementation.
 6. Process Control Program (PCP) implementation.

and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the whole body dose received from external sources shall be assigned to specific major work functions.

c. Monthly Operating Report

The requirement for this report has been deleted.

d. Annual Radiological Environmental
Monitoring Report

A report on the Radiological Environmental Monitoring Program for the previous calendar year shall be submitted to the Nuclear Regulatory Commission in accordance with 10 CFR 57.4 as a separate document by May 1 of each year.

prepared and submitted to the Nuclear Regulatory Commission in the Annual Radiological Environmental Monitoring Report.

e. Semi-annual Radioactive Effluent Release Report

Routine Radioactive Effluent Release Reports covering the activities of the unit during the previous six months shall be submitted within 60 days after January 1 and July 1 of each year.

The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June, 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

An annual summary of hourly meteorological data collected over the previous year shall be maintained for five years by the licensee.

7.8 HIGH RADIATION AREA

7.8.1 Pursuant to 10 CFR 20, in lieu of the "control device" or "alarm signal", each high radiation area, as defined in 10 CFR Part 20, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics personnel) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area, or
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them, or
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physics staff in the RWP.

7.8.2 In addition to the requirements of 7.8.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked enclosures to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or health physics supervision. Enclosures shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

For individual areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be barricaded, conspicuously posted and a flashing light shall be activated as a warning device whenever the dose rate in the area exceeds or will shortly exceed 1000 mR/h.

ATTACHMENT 3

TO P-92153

NO SIGNIFICANT HAZARDS
CONSIDERATION ANALYSIS

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

This request to amend the FSV Facility Operating License and the Administrative Controls Section of the Technical Specifications involves several administrative changes, all of which are associated with program revisions and organizational changes appropriate for a permanently shutdown plant. Each change will be described and justified individually. These descriptions will then be followed by a No Significant Hazards Consideration Analysis in accordance with the criteria contained in 10 C.R. 50.92.

1. Management Title Changes

PSC has undertaken a re-organization within Nuclear Operations to allow a better transition to the decommissioning organization. This re-organization eliminates certain positions and creates others, with the result that many of the positions identified within the Technical Specifications must be revised.

All references to the Vice President, Nuclear Operations have been replaced with the Vice President responsible for nuclear activities. This designates the executive level position with responsibility for all activities associated with Fort St. Vrain.

All references to the Manager, Nuclear Production and Station Manager have been replaced with the Defueling and Decommissioning Program Director and Station Manager.

Plant Operations Review Committee (PORC) membership has been revised to include the following:

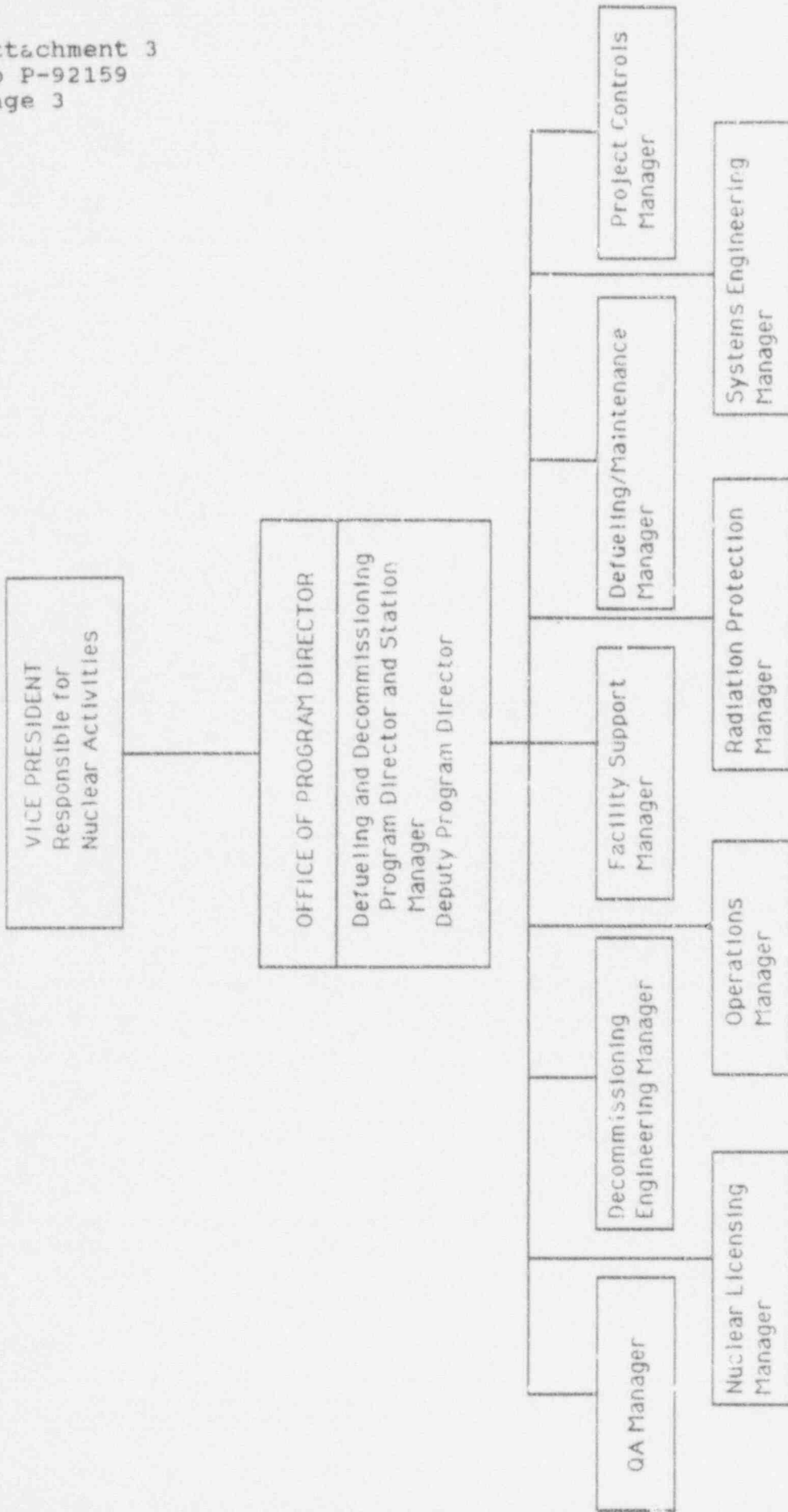
Defueling and Decommissioning Program Director and
Station Manager (formerly Manager, Nuclear
Production and Station Manager)
Deputy Program Director (new position)
Facility Support Manager (formerly Nuclear Training and
Support Manager)
Radiation Protection Manager (formerly Superintendent of
Chemistry and Radiation Protection)
Operations Manager
Defueling/Maintenance Manager (new position)
Systems Engineering Manager
Decommissioning Engineering Manager (new position)

Nuclear Facility Safety Committee (NFSC) membership has been revised to include the following:

Chairman
Defueling and Decommissioning Program Director and
Station Manager (formerly Manager, Nuclear Production
and Station Manager)
Deputy Program Director (new position)
Nuclear Licensing Manager (formerly Manager, Nuclear
Licensing and Resource Management)
Systems Engineering Manager (formerly Manager, Nuclear
Engineering Division)
Decommissioning Engineering Manager (new position)
Quality Assurance Manager (formerly Manager, Quality
Assurance Division)
Radiation Protection Manager (formerly Nuclear Training
and Support Manager)
Safety and Security Director
Consultants, as required

Justification: The re-organization described above is illustrated on the attached organization chart, provided for information. This organization will improve internal communications by reducing overall management positions and eliminating at least one level of management. Also, this organization focuses on the Office of the Program Director which will facilitate the transition into the Early Dismantlement decommissioning organization upon the completion of defueling.

This organization retains sufficient expertise and diversification within both the PORC and NFSC, consistent with that contained in the present committees, and with the guidance provided in the Standard Technical Specifications (e.g., Westinghouse STS, NUREG-0452, Revision 5). The functions and charters of these committees have not been changed.



FSV TRANSITION ORGANIZATION

2. Security Program Deletion After Fuel Removal

License Condition 3 was revised to allow the termination of the physical security plan, guard training and qualification, and safeguards contingency plans after all nuclear fuel has been removed from the FSV Protected Area.

Justification: After all nuclear fuel has been removed from the FSV Protected Area, PSC will implement an Access Control plan, consistent with Section 8 of the Proposed Decommissioning Plan. At that time, FSV will not be a utilization facility as defined in 10 CFR 50.2, we will not conduct activities licensed pursuant to 10 CFR 70, and formula quantities of strategic special nuclear material or special nuclear material will no longer be within the FSV Protected Area. Therefore, a physical security plan, guard training and qualification, and safeguard contingency plans in accordance with 10 CFR 73 will not be required.

3. Deletion of Licensed Operators After Fuel Removal

All requirements for licensed operators (e.g., RO, SRO, SSLO) were revised to allow the deletion of these positions once all nuclear fuel has been removed from the FSV Protected Area.

Justification: Once all nuclear fuel has been removed from the FSV Protected Area, then Fort St. Vrain will no longer be considered a nuclear reactor or a utilization facility as defined in 10 CFR 50.2. Therefore, the operator licensing requirements in 10 CFR 55 are not applicable and licensed operators are not required. This is consistent with the organizational requirements contained in the proposed FSV Decommissioning Technical Specifications (PSC Letter, Crawford to Weiss, dated March 19, 1992, P-92115).

4. Deletion of Technical Advisor

All references to Technical Advisors were deleted.

Justification: Deletion of the Technical Advisor position can be accomplished at the present time, based on the permanent shutdown condition of the plant. This is consistent with the equivalent Shift Technical Advisor (STA) requirements in the Westinghouse Standard Technical Specifications (NUREG 0452, Revision 5). STS Table 6.2-1, Minimum Shift Crew Composition, does not require that the STA position be manned during cold shutdown and refueling modes. The permanently shutdown condition of Fort St. Vrain allows sufficient time for any plant concerns to be resolved by available staff, including Operations, System Engineering, and Management personnel.

5. Deletion of the Fire Brigade After Fuel Removal

All requirements for a Fire Brigade were revised to allow deletion of the Fire Brigade after all nuclear fuel has been removed from the FSV Protected Area.

Justification: Once all nuclear fuel has been removed from the FSV Protected Area, Fort St. Vrain will essentially have the same fire hazards that will exist during decommissioning. PSC has developed a Decommissioning Fire Protection Plan (D/FPP) appropriate for the hazards during decommissioning, and this plan does not include requirements for a fire brigade. The 10 CFR 50.59 safety evaluation for the D/FPP states that a fire brigade is not required after all nuclear fuel has been removed from the plant based on the reduced consequences of a fire, and considering the availability of local offsite fire department assistance. A copy of the 10 CFR 50.59 safety evaluation for the D/FPP was provided for NRC information under separate cover (PSC Letter, Crawford to Weiss, dated December 20, 1991, P-91434).

6. Redefinition of Requirements for Radiation Protection Personnel

The requirement that an operator or technician qualified in radiation protection procedures be present at the facility whenever fuel is on site was revised to apply whenever nuclear fuel is within the FSV Protected Area and during physical activities involving radioactively contaminated systems or equipment.

Justification: The FSV Independent Spent Fuel Storage Installation (ISFSI) is located on PSC property and therefore could be considered "on site". However, the ISFSI design does not require that radiation protection personnel be on site while fuel is being stored in the ISFSI. After all nuclear fuel has been removed from the Protected Area, radiation protection personnel will be required on site during physical activities involving radioactively contaminated systems or equipment, to ensure adequate worker protection.

7. Requirement for Defueling Procedures

Section 7.4 was revised to require written procedures for "Defueling activities" in lieu of "Refueling operations".

Justification: This revision formalizes PSC's current practices for applying the previous requirements for "Refueling" administrative controls to "Defueling" activities.

8. Deletion of Monthly Operating Report

The requirements to submit a Monthly Operating Report were deleted.

Justification: FSV AC 7.5.1.c requires that the Monthly Operating Report include: (1) a narrative summary of operating experience including major safety-related maintenance, (2) a report of any single release of radioactivity or radiation exposure which accounts for more than 10% of the allowable annual values, (3) a report of indications of failed fuel, and (4) monthly statistical information contained in Regulatory Guide 1.16.

Relative to Item (1), the FSV Possession Only License precludes any further operation of the plant. Therefore, there will be no additional operating experience to report. Also, the amount of major safety related maintenance has been and is expected to be small, would not be of generic interest, and is not significant enough to support a monthly report.

Regarding Item (2), radioactivity releases that exceed specified limits must be reported within 30 days in accordance with Administrative Control 7.5.3, and reports of overexposures are required by 10 CFR 20.405.

Regarding Item (3), there is no mechanism to create additional failed fuel, as long as LCO 4.2.15 PCRV liner cooling requirements are met. Any LCO 4.2.15 violations would be reportable via an LER.

Regarding Item (4), the Possession Only License precludes any further operation, so there will be no further power level, availability, or generation statistics to report, as required by Regulatory Guide 1.16.

Most of the Monthly Operating Report information is not applicable for a permanently shutdown plant, and the information that would be applicable is available from other sources. Therefore, the continued submittal of a FSV Monthly Operating Report is not meaningful and this task may be deleted.

9. Revision of Semi-annual Radioactive Effluent Release Report

The requirement for the Semi-annual Radioactive Effluent Release Report to cover the previous six months of operation was revised to cover the previous six months.

Justification: Further operation of Fort St. Vrain has been precluded by the Possession Only License. Therefore, it is appropriate that the Semi-annual Radioactive Effluent Release Report cover the previous six month period.

10. Addition of High Radiation Area Controls

New Section 7.8 was added to provide requirements for conducting activities in a high radiation area under Radioactive Work Permit controls.

Justification: These requirements are consistent with the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 5), and with Appendix D of Draft Regulatory Guide DG-8006, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants", which is being developed consistent with the new 10 CFR 20 requirements.

The proposed Section 7.8 differs from the Standard Technical Specification (STS) wording in that specific 10 CFR 20 paragraph references have been deleted. Also, the specific criteria that define a high radiation area have been deleted, so that a high radiation area is "as defined in 10 CFR Part 20". The paragraph numbers and the high radiation area criteria differ between the current 10 CFR 20 and the new 10 CFR 20. PSC currently anticipates that defueling will be completed before the implementation date of the new 10 CFR 20 requirements, and that the Decommissioning Technical Specifications will then supersede the existing Technical Specifications. However, the proposed Section 7.8 wording will allow use of either the current 10 CFR 20 or the new 10 CFR 20 requirements.

An additional change from the STS wording is that the last sentence in Section 7.8.2 states that a flashing light will be activated as a warning device "whenever the dose rate in the area exceeds or will shortly exceed 1000 mR/h." The phrase in quotes is included in DG-8006, but it is not a part of the STS wording; PSC included this phrase as a clarification of the requirements for a warning device around a very high radiation area.

No Significant Hazards Consideration Analysis

In accordance with the standards in 10 CFR 50.92, and based on the justification provided above, the proposed amendment to the FSV Facility Operating License and Technical Specifications involves no significant hazards consideration, since it would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

This amendment generally maintains the current level of administrative controls until all nuclear fuel has been removed from the FSV Protected Area. The elimination of Technical Advisors and the establishment of new high radiation area controls is consistent with controls provided in the Standard Technical Specifications in use at other nuclear facilities. Based on the justifications provided above in the discussion of individual proposed changes, the program reductions allowed after fuel has been removed from the Protected Area and the other proposed changes do not increase the probability or the consequences of any previously evaluated accidents.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed revisions to the Administrative Controls do not create any new or abnormal modes of equipment operation and do not create the possibility of any new accidents.

3. Involve a significant reduction in a margin of safety.

As long as nuclear fuel is located within the FSV Protected Area, the same level of administrative review will be retained as is currently in effect and personnel qualifications will be maintained. After nuclear fuel has been removed, the level of administrative controls provides an appropriate administrative margin of safety. No operational margins of safety are affected by this proposed amendment.

Conclusion:

Based on the above, it is concluded that performance of defueling or other shutdown activities at Fort St. Vrain, in accordance with the proposed changes to the Administrative Controls, will involve no significant hazards consideration.