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Company of Colorado

April 17, 1992
Fort St. Vrain
Unit No. 1
P-92162

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: REVISION TO THE FORT ST. VRAIN PROPOSED
DECOMMISSIONING PLAN

REFERENCES: (see attached)

Dear Dr. Weiss:

The purpose of this letter is to provide a revision to Public Service Company of Colorado's (PSC's) Proposed Decommissioning Plan (PDP) for Fort St. Vrain, originally submitted to the NRC in References 1 and 2. This revision is forwarded in response to PSC's commitment to update the PDP to incorporate additional information provided to the NRC in References 3 through 15. These submittals provided additional information, and in some instances revised information, to the plan that was originally submitted.

In addition, since the approved Decommissioning Plan will replace the Updated Final Safety Analysis Report as the licensing basis for Fort St. Vrain, PSC has incorporated the descriptions and design basis for existing plant systems and components that will be used at various times during the decommissioning period.

With reference to the new 10 CFR 20 program, PSC had originally indicated intent to implement the new program at the beginning of decommissioning. Now that the implementation of the revised 10 CFR 20 may be delayed, PSC

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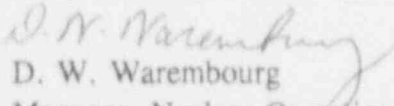
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tentatively plans to implement the revised 10 CFR 20 no later than January 1, 1994. Depending on the projected status of the Fort St. Vrain decommissioning project as of January 1, 1994, PSC may apply for an exemption of the implementation of the revised 10 CFR 20 requirements for the remainder of the decommissioning project. However, PSC plans to implement the revised 10 CFR 20 for the 10 CFR 72 Independent Spent Fuel Storage Installation (ISFSI) by January 1, 1994.

Attachment 1 to this letter provides a summary of the changes incorporated into this latest revision of the Proposed Decommissioning Plan. Attachment 2 provides the revised plan, together with instructions for entering the change to the Fort St. Vrain Proposed Decommissioning Plan. If you have any questions related to the contents of this letter, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,


D. W. Warembourg
Manager, Nuclear Operations

DWW:CRB/cb

Attachment

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
4210 East 11th Avenue
Denver, CO 80220

REFERENCES

1. PSC letter, Crawford to Weiss, dated November 5, 1990; Subject: "Fort St. Vrain Proposed Decommissioning Plan" (P-90318).
2. PSC letter, Crawford to Weiss, dated July 1, 1991; Subject: "Revision to the Fort St. Vrain Proposed Decommissioning Plan" (P-91217).
3. PSC letter, Crawford to Weiss, dated July 10, 1991; Subject: "Supplement to the Environmental Report - Post Operating License Stage" (P-91219).
4. PSC letter, Crawford to Weiss, dated July 26, 1991; Subject: "Initial Site Characterization Program" (P-91240).
5. PSC letter, Crawford to Weiss, dated July 30, 1991; Subject: "PSC Response to NRC RAI - DTS & Representative Cost Estimate" (P-91248).
6. PSC letter, Crawford to Weiss, dated August 28, 1991; Subject: "Verification of FSV Activation Analysis". (P-91271).
7. PSC letter, Crawford to Weiss, dated August 30, 1991; Subject: "Decommissioning Technical Specifications" (P-91278).
8. PSC letter, Crawford to Weiss, dated December 6, 1991; Subject: "PSC Response to NRC RAI (#13 & #16)" (P-91423).
9. PSC letter, Crawford to Weiss, dated January 9, 1992; Subject: "PSC Response to NRC RAI (#11 & #38)" (P-92014).
10. PSC letter, Warembourg to Weiss, dated January 15, 1992; Subject: "Results of Final Structural Evaluation of the PCRV" (P-92012).
11. PSC letter, Crawford to Weiss, dated January 20, 1992; Subject: "Confirmation of PSC's Selection of the "DECON" Decommissioning Alternative" (P-92029).
12. NRC letter, Weiss to Crawford, dated January 27, 1992; Subject: "FSV Decommissioning Funding Plan" (G-92015).
13. PSC letter, Warembourg to Weiss, dated February 18, 1992; Subject: "PSC Response to NRC RAI (#9, #12 & #14)" (P-92064).
14. PSC letter, Crawford to Weiss, dated March 19, 1992; Subject: "Decommissioning Technical Specifications" (P-92115).
15. PSC letter, Warembourg to Weiss, dated February 5, 1992; Subject: "Initial Site Characterization Program Results" (P-92036).

ATTACHMENT 1 TO P-92162

SUMMARY OF REVISIONS TO THE FSU PROPOSED DECOMMISSIONING PLAN APRIL 17, 1992

<u>SECTION</u>	<u>PROPOSED REVISION</u>
1.0	○ Minor revisions to Sections 1.1, 1.2, 1.4 and 1.5 to reflect changes made in later PTP sections.
2.1	○ Incorporated PSC selection of the "DECON" decommissioning alternative.
2.2	○ Incorporated description of Reactor Building louvers and crane. ○ Incorporated RAI discussion of core barrel and core support floor. ○ Added FSAR design basis descriptions of systems or structures that may be used during portions of the decommissioning period: Hot Service Facility, Systems 62, 63, 73 and 93. ○ Additional description and figure of liquid effluent release paths and water supplies.
2.3	○ Incorporated information from PCRV Structural Analysis. ○ Incorporated RAI response on PCRV Shield Water System (formerly the PCRV Water Cleanup and Clarification System) design information. ○ Deleted requirement to sample the PCRV at ¼-core increments during the core fill process. ○ Incorporated RAI responses for the PCRV top head, component removal, core barrel and CSF removal, and steam generator removal. ○ Incorporated information from initial site characterization survey results into the descriptions for contaminated balance of plant (BOP) equipment. ○ Incorporated latest detailed project schedule. ○ Minor corrections to Table 2.3-1.
2.4	○ Minor revisions to the PSC Organization, including addition of Deputy Project Director and Project Controls Manager.
2.5	○ Updated Figure 2.5-1 to reflect management reporting responsibilities.

- 2.6 ○ Deleted emergency preparedness and fire protection training requirements.

- 3.1 ○ Revised to incorporate results of initial site characterization study.
 - Incorporated latest revision to activation analysis and last submittal to NRC on activation verification activities.
 - Incorporated RAI response on tritium source term from the graphite.
 - Incorporated revision of plateout analysis based on end of reactor life at 390 EFPD and revised tables accordingly.

- 2 ○ Revised commitment to implement new 10 CFR 20 by January 1993.
 - Moved ORE discussion to Section 3.2.5.2 and added Table 3.2-1.

- 3.3 ○ Provided current defueling plans to the ISFSI and deleted discussion of shipments to DOE.
 - Incorporated tritium and effluent release description as per RAI responses.
 - Identified effluent release criteria consistent with Environmental Report - Post Operating Phase.
 - Moved LLRW discussion from Section 5 to 3.3.3.1.
 - Minor revisions to tables.

- 3.4 ○ Added steam generator drop accident description.
 - Updated heavy load drop accident to account for largest (rather than average) permanent side reflector.
 - Incorporated updated activation and plateout analyses results, and revised accident consequences accordingly.
 - Added discussions related to natural gas concerns in the vicinity of Fort St. Vrain and containment tent fires.

- 4 (No revisions)
- 5 ○ Added reference to NRC approval of PSC's Decommissioning Funding Plan.
- 6 ○ Added reference to recent Technical Specification submittals to NRC.
- 7 ○ Updated reporting responsibilities.
- 8 ○ Deleted reference to conversion project.
- 9/10 Deleted sections; plans submitted separate from Decommissioning Plan.