December 21, 1995

Docket No. 50-267 License No. DPR-34

Mr. A. Clegg Crawford Vice President, Electric Operations Public Service Company of Colorado P.O. Box 840 Denver, Colorado 80201-0840

Dear Mr. Crawford:

SUBJECT: REVIEW OF PUBLIC SERVICE COMPANY OF COLORADO SUBMITTAL P-95077 "FORT ST. VRAIN FINAL SURVEY PLAN FOR SITE RELEASE, PROPOSED REVISIONS FOR SURVEY OF PIPING SYSTEMS AND SUSPECT AFFECTED SURVEY UNITS"

The Nuclear Regulatory Commission staff has reviewed Public Service Company of Colorado's (PSC) October 12, 1995, submittal (P-95077), "Fort St. Vrain Final Survey Plan for Site Release, Proposed Revisions for Survey of Piping Systems and Suspect Affected Survey Units," which contained 3 proposed changes to the final survey plan, and the applicable technical support documents.

Enclosure 1 contains several comments related to the dose assessments provided in "Proposed Change 1: Embedded Piping Treatment." In addition, the staff has performed a detailed review of the "Fort St. Vrain Technical Basis Documents for Piping Survey Instrumentation," WCAP-14496, submitted to support "Proposed Change 2: Determination of Interior Piping System Surface Contamination Levels." The technical basis documents will also be reviewed by the Oak Ridge Institute for Science and Education, and comments on the technical basis documents will be transmitted in a separate letter. FSV's "Proposed Change 3: Exposure Rate Frequency" is approved. One exposure rate measurement per 4 m<sup>2</sup> of building surfaces and structures is acceptable.

If you have any questions, please contact David N. Fauver at (301) 415-6625. Sincerely, Clayton L. Pittiglio, Project Manager Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards Enclosure: As stated cc: See attached list PIRUTION: Central File

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

Saurence Dellyon CLP

Clayton L. Pittiglio, Project Manager Low-Level Waste and Decommissioning Projects Branch Division of Waste Management Office of Nuclear Material Safety and Safeguards

Enclosure: As stated cc: See attached list

NRC Comments on Proposed Change 1 in PSC's October 12, 1995, Submittal "Fort St. Vrain Survey Plan for Site Release, Proposed Revisions for Survey of Piping Systems and Suspect Affected Survey Units"

- 1. What is the basis for the assumption that grout filled pipes are not expected to release significant amounts of contamination to groundwater during hypothetical future burial scenarios?
- 2. Please provide the bases for the assumption that inhalation intake would be minor if grout filled pipes are cut during a renovation scenario. Include the number of pipes assumed to be cut during the renovation.
- 3. In the occupancy scenario, it assumed that five embedded pipes terminate directly at surface where the shop or office would be located. Please provide the basis for selecting five pipes.
- 4. In the dismantlement scenario, what thickness of concrete is assumed to remain around the removed pipe? Also, please provide the bases for the assumptions regarding the number of pipes and the time of occupancy.
- Please provide the assumptions and output for all microshield runs.
- 6. What is the total activity projected to be left in the pipes? How does this compare to the the total activity predicted to remain in the rest of the facility after remediation?
- 7. Is there any salvage value to the imbedded piping that could result in long-term above ground storage or recycling?

Enclosure 1

Letter dated: December 21, 1995

Fort St. Vrain Docket No. 50-267 License No. DPR-34 CC: Mr. David Alberstein, Manager GA International Services Corporation P.O. Box 85608 San Diego, CA 92138 Mr. D. D. Hock Chairman, President, and Chief Executive Officer Public Service Company of Colorado P.O. Box 840 Denver, CO 80201-0840 Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011 Chairman, Board of County Commissioners of Weld County, Colorado Greeley, CO 80631 Regional Representative Radiation Programs Environmental Protection Agency 1 - Denver Place 999 18th Street, Suite 1300 Denver, CO 80202-2413 Radiation Control Division (RCD-DO-B1) Colorado Department of Health 4300 Cherry Creek Drive South Denver, CO 80222-1530 Commitment Control Program Coordinator Public Service Company of Colorado 16805 Weld County Road 19-1/2 Platteville, CO 80651 Mr. M. H. Holmes Nuclear Licensing Manager

Public Service Company of Colorado 16805 Weld County Road 19-1/2 Platteville, CO 80651