In Reply Refer To: Docket: 50-267 1.9-84

Public Service Company of Colorado ATTN: O. R. Lee, Vice President Electric Production P.O. Box 840 Denver, Colorado 80201

Gentlemen:

We have reviewed the 1984 Fort St. Vrain radiological emergency exercise (FOSAVEX-84) scenario and observer/prompter packages submitted with your letter dated June 11, 1984.

Our review indicates that the scenario for FOSAVEX-84 does not support an escalation to a general emergency classification. This is not consistent with 10 CFR Part 50, Appendix E, IV.F, which requires the conduct of full-scale exercises which test as much of the licensee's emergency plans as is reasonably achievable. Your request for exemption from providing for full-scale testing of the state and local plans during this exercise, if granted, will not relieve you from meeting this requirement within the annual period specified.

In addition, we note that your letter states that testing of the early warning alert system will be separate from the exercise. Our position is that it is more appropriate to include the test as part of the exercise unless there is adequate justification for testing at another time. This justification should be documented in the supporting information provided with the scenario.

Please review your scenario and plans for conduct of the exercise in regard to the concerns denoted above and advise this office as soon as possible of any changes you will make.

Sincerely,

Original Signed By E. H. Johnson

E. H. Johnson, Chief Reactor Project Branch 1

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cc:
D. W. Warembourg, Nuclear Production
Manager
Fort St. Vrain Nuclear Station
P.O. Box 368
Platteville, Colorado 80651

J. Gahm, Quality Assurance Manager (same address)

EPA The John Commery/1r

JBaird REHall Reangart 7/2/84 7/5/84/06/84 SP&ES RITE and 7/6/84

RPB1 506 EJohnson 7/9/84

10 1135

bcc to DMB (IE 35) after exercise

bcc distrib. by RIV:

Resident Inspector RPB1

Section Chief (SP&ES)

P. Wagner, RRI D. Powers, RPB1

COLORADO STATE DEPT. HEALTH (after exercise)

J. Collins, RA

R. Denise, DRS&P

J. L. Montgomery

R. L. Bangart C. A. Hackney