

May 12, 1992

Docket No. 50-267

LICENSEE: Public Service Company of Colorado  
FACILITY: Fort St. Vrain Nuclear Generating Station  
SUBJECT: SUMMARY OF May 6, 1992 MEETING WITH PSC TO DISCUSS  
STATUS OF FORT ST. VRAIN DECOMMISSIONING

The Public Service Company of Colorado (PSC) requested this meeting in Rockville, Maryland to provide an update of Fort St. Vrain (FSV) decommissioning actions. Those in attendance are listed in Enclosure 1. A copy of the handouts used in PSC presentations is also enclosed (Enclosure 2). PSC provided the status of: litigation on spent fuel shipment; transfer of spent fuel from the Reactor Building to the ISFSI; component removal; decommissioning preparations and future personnel changes.

NRC staff members pointed out that unless PSC could provide more directly applicable data to support it's 0.5 percent (500 curie) release estimate for tritium we would base our environmental assessment on the more conservative estimate of 8000 curies for tritium release. This release uncertainty could impact on the need for an Environmental Impact Statement rather than an Environmental Assessment.

- original signed by -  
Peter B. Erickson, Senior Project Manager  
Non-Power Reactors, Decommissioning and  
Environmental Project Directorate  
Division of Advanced Reactors  
and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

cc w/enclosures:  
See next page

DISTRIBUTION:

Docket File No. 50-267

NRC & Local PDRs

PDNP R/F

TMurley/FMiraglia

JPartlow

DCrutchfield

WTravers

BBoggs

SWeiss

PERickson

EHylton

OGC

EJordan

NRC Participants

ACRS (10)

ABBeach

Region IV

PDNP: *[Signature]*

PDNP: PM *[Signature]*

PDNP: *[Signature]*

PDNP: D *[Signature]*

EHylton

PERickson: lb

RDudley

SWeiss

05/12/92

05/12/92

05/12/92

05/12/92

[SUMMARY4]

NRC FILE CENTER COPY

9205260247 920512  
PDR ADOCK 05000267  
P PDR

*[Handwritten initials]*



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

May 12, 1992

Docket No. 50-267

LICENSEE: Public Service Company of Colorado  
FACILITY: Fort St. Vrain Nuclear Generating Station  
SUBJECT: SUMMARY OF May 6, 1992 MEETING WITH PSC TO DISCUSS  
STATUS OF FORT ST. VRAIN DECOMMISSIONING

The Public Service Company of Colorado (PSC) requested this meeting in Rockville, Maryland to provide an update of Fort St. Vrain (FSV) decommissioning actions. Those in attendance are listed in Enclosure 1. A copy of the handouts used in PSC presentations is also enclosed (Enclosure 2). PSC provided the status of: litigation on spent fuel shipment; transfer of spent fuel from the Reactor Building to the ISFSI; component removal; decommissioning preparations and future personnel changes.

NRC staff members pointed out that unless PSC could provide more directly applicable data to support it's 0.5 percent (500 curie) release estimate for tritium we would base our environmental assessment on the more conservative estimate of 8000 curies for tritium release. This release uncertainty could impact on the need for an Environmental Impact Statement rather than an Environmental Assessment.

*Peter B. Erickson*  
Peter B. Erickson, Senior Project Manager  
Non-Power Reactors, Decommissioning and  
Environmental Project Directorate  
Division of Advanced Reactors  
and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

cc w/enclosures:  
See next page

ENCLOSURE 1

Meeting With Public Service Company of Colorado  
Fort St. Vrain Decommissioning  
May 6, 1992

ATTENDEES

Name

Organization

Seymour Weiss	NRC/NRR/PDNP
Richard Dudley	NRC/NRR/PDNP
Pete Erickson	NRC/NRR/PDNP
Larry Pittiglio	NRC/NMSS
Fritz Sturz	NRC/NMSS
Richard Bangart	NRC/NMSS
Bill Brach	NRC/NMSS
Edwin Reis	NRC/OGC
Michael Holmes	PSC
Clegg Crawford	PSC
Jim Krauss	Westinghouse

Mr. A. Clegg Crawford  
Public Service Company of Colorado

Docket No. 50-267  
Fort St. Vrain

cc:

Mr. M. H. Holmes  
Nuclear Licensing Manager  
Public Service Company  
of Colorado  
16805 Weld County Road 19-1/2  
Platteville, Colorado 80651

Regional Representative  
Radiation Programs  
Environmental Protection Agency  
1 Denver Place  
999 18th Street, Suite 1300  
Denver, Colorado 80202-2413

Mr. David Alberstein, Manager  
Fort St. Vrain Services  
GA International Services Corporation  
P. O. Box 85608  
San Diego, California 92138

Robert M. Quillin, Director  
Radiation Control Division  
Department of Health  
4210 East 11th Avenue  
Denver, Colorado 80220

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Public Service Company of Colorado  
Attn: Nuclear Licensing  
16805 Weld County Road 19-1/2  
Platteville, Colorado 80651

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 640  
Platteville, Colorado 80651

Mr. P. F. Tomlinson, Manager  
Quality Assurance Manager  
Public Service Company of Colorado  
16805 Weld County Road 19-1/2  
Platteville, Colorado 80651

Kelly, Stansfield & O'Donnell  
1225 17th Street, Suite 2600  
Denver, Colorado 80202

Mr. D. D. Hock  
President and Chief Executive Officer  
Public Service Company of Colorado  
P. O. Box 840  
Denver, Colorado 80201-0840

Chairman, Board of County Commissioners  
of Weld County, Colorado  
Greeley, Colorado 80631

Commitment Control Program -  
Coordinator  
Public Service Company of Colorado  
2420 W. 26th Avenue, Suite 100-D  
Denver, Colorado 80211

---

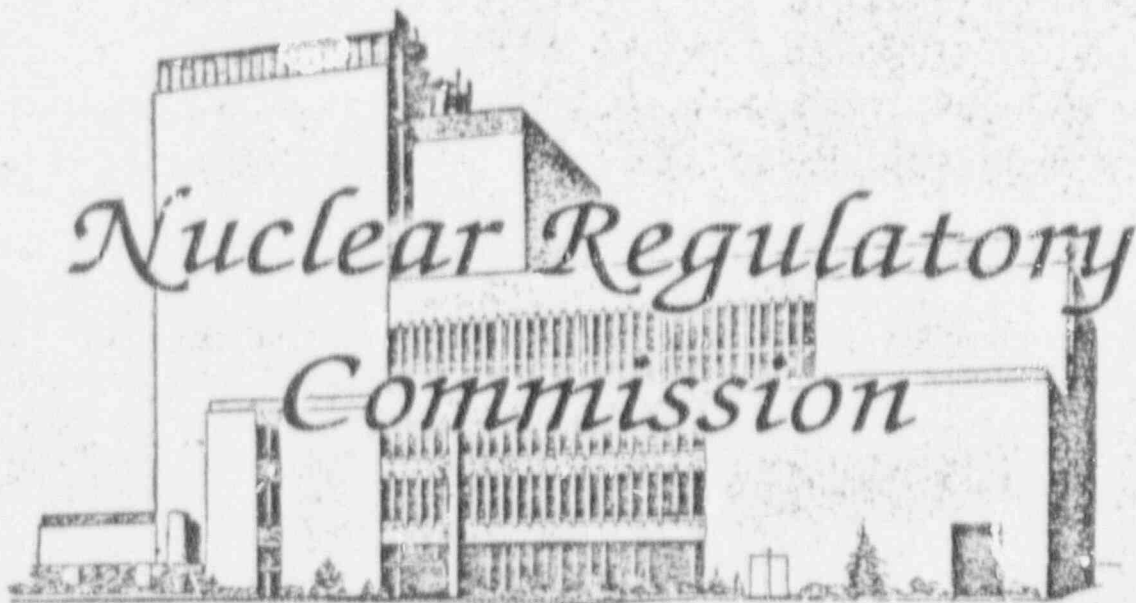
---

# FORT ST. VRAIN

---

---

UPDATE ON RECENT EVENTS



MAY 1992



**Public Service\***

Public Service Company of Colorado

## AGENDA

- I. Defueling Litigation Status
- II. Defueling Update
- III. Unloading Spent Fuel From the ISFSI
- IV. Component Removal
- V. Decommissioning Status
- VI. Personnel Update and Issues
- VII. Conclusions



## DEFUELING LITIGATION STATUS

PSC and DOE Initiated a Series of Legal Actions Against the State of Idaho and Governor Andrus Alleging That Governor Andrus Violated Commerce Clause of Constitution, Atomic Energy Act as Amended and Hazardous Materials Transportation Act

- Judgment : in favor of PSC on May 7, 1992

Governor Andrus Sued DOE Claiming DOE Violated Nuclear Waste Policy Act and National Environmental Policy Act

- Ninth Circuit Court dismissed finding no jurisdiction because NWPA did not apply (September 10, 1991)
- Idaho's counterclaim against DOE for NEPA violations still pending

Three Fuel Shipments Were Made Between October 4 and October 16, 1991 - Additional Shipments Have Been Suspended Due to Further Litigation

## DEFUELING LITIGATION STATUS

### Governor Andrus Sued DOE Alleging That INEL Accepting Fort St. Vrain Fuel Was Not in Compliance With Idaho Air Pollution Standards

- District court ruled in favor of Idaho and issued an injunction against DOE
- Ninth Circuit Court reversed the District Court and dissolved the injunction on March 23

### DOE Working With Idaho and Bannock-Shoshone Indian Tribe to Resolve Issues Related to Environmental Assessment

- Revision Should be Completed By June
- DOE Decision to Re-commence Spent Fuel Shipping Still Pending

### Governor Andrus Still Creating More Roadblocks

- NEPA counter-claim still pending in District Court
- Revised Idaho air quality law
- Appeal to Supreme Court concerning previous ruling that NWPA does not apply



## DEFUELING UPDATE

Defueling to ISFSI Began on December 26, 1991

- Defueling at rate of approximately 1.3 shipments per day
- 168 of 247 shipments have been made to date
- Defueling from reactor is 95 % complete
- Defueling from Reactor Building is approximately 68 % complete
- At current rate defueling from Reactor Building will be complete by late June or early July 1992

Defueling From the Reactor Building to INEL Can Proceed in Parallel With Defueling to ISFSI

PSC's Intent is to Continue to Ship Spent Fuel to the ISFSI Until DOE Approves Resumption of Shipments to Idaho

Decommissioning Will Take Place When the Fuel is Removed From the Reactor Building and After Receipt of NRC Approval to Decommission - Scheduled to Commence August 1, 1992

## UNLOADING SPENT FUEL FROM THE ISFSI

Current PSC Shipping Casks are Not Licensed to Ship ISFSI Fuel Storage Canisters to DOE Facility

PSC Has Evaluated Four Options for Unloading Fuel From the ISFSI

- Relicensing of existing Fort St. Vrain casks
- Building new shipping casks
- Building new fuel transfer hardware to unload spent fuel into existing casks at the ISFSI
- Utilize Three Mile Island casks to transport ISFSI canisters

Two Options Are Being Pursued:

- One method is to re-license existing Fort St. Vrain casks
  - ▶ Technical feasibility study completed in April
  - ▶ Additional technical information to finalize process will be available in late May or early June
- Second approach is to license and build two new casks, trailers and hardware
  - ▶ Foster Wheeler selected as vendor

## UNLOADING SPENT FUEL FROM THE ISFSI (Continued)

Decision to Follow One Approach Will be Made in June 1992

- Schedule will be established depending on option selected,
- To make schedule, close coordination with the NRC will be required to expedite licensing process
- Defueling from ISFSI to INEL is on hold until issue resolved

## COMPONENT REMOVAL

### Component Removal Has Been Taking Place in Parallel With Defueling

- Twenty-seven of eighty-four region constraint devices removed and shipped off-site
- All remaining region constraint devices have been removed and are awaiting shipment in 1992
- Thirty of forty-four control rod drive bodies shipped off-site for disposal
- Twenty-eight pairs of control rod absorber strings shipped off-site for disposal
- The final fifteen pairs of control rod absorber strings awaiting shipment off-site in 1992
- Two helium circulators removed; one shipped off-site - remaining four circulators to be shipped off-site in 1992

## DECOMMISSIONING STATUS

Decommissioning Scheduled to Begin August 1, 1992

Westinghouse Team Has Begun Site Mobilization

- Approximately 15 personnel on site; 90 anticipated to be on-site by August 1

Resolution of Low Level Radioactive Waste Disposal Agreement Between the Rocky Mountain Compact and the Northwest Compact is Projected for Summer 1992

No Public Comments or Intervention on NRC Federal Register Notice of Intent to Issue the Fort St. Vrain Decommissioning Order

NRC Acceptance of the Decommissioning Funding Plan was Received January 27, 1992

- Public Utilities Commission (PUC) has approved method which permits PSC to recover \$13.9 million per year for 12 years to cover dismantlement and financing costs

PSC Understands That All Decommissioning Activities have Been Properly Addressed and Appropriate Information Submitted to the Staff for Review

NRC Approvals Are Anticipated to Support Beginning Decommissioning on August 1, 1992

## DECOMMISSIONING STATUS (Continued)

PSC Has a Number of Concerns That Could Potentially Impact Decommissioning Plans:

- Approval of the Proposed Decommissioning Plan
- Final Site Release Process
  - ▶ PSC is applying the criteria of 5 microR/hour above background measured at one meter for direct exposure, and Regulatory Guide 1.86 for contamination limits
  - ▶ All PSC cost estimates, schedules and low level waste volume estimates are based upon these criteria
  - ▶ Continued NRC commitment to these criteria is essential
  - ▶ Existing final release survey guidance predominantly applies to bare walls which does not fit Fort St. Vrain situation
- Are there material release criteria inconsistencies within the NRC?
- Implementation of new Part 20 requirements



## PERSONNEL UPDATE

### Destaffing Through May 1, 1992

- PSC employees reduced from 527 to 216
- Contract personnel reduced from 358 to 172
- Total reduction from 885 in January 1989 to present number of 388

### Major Changes Occurred in January 1992 to Flatten and Consolidate Nuclear Operations Organization

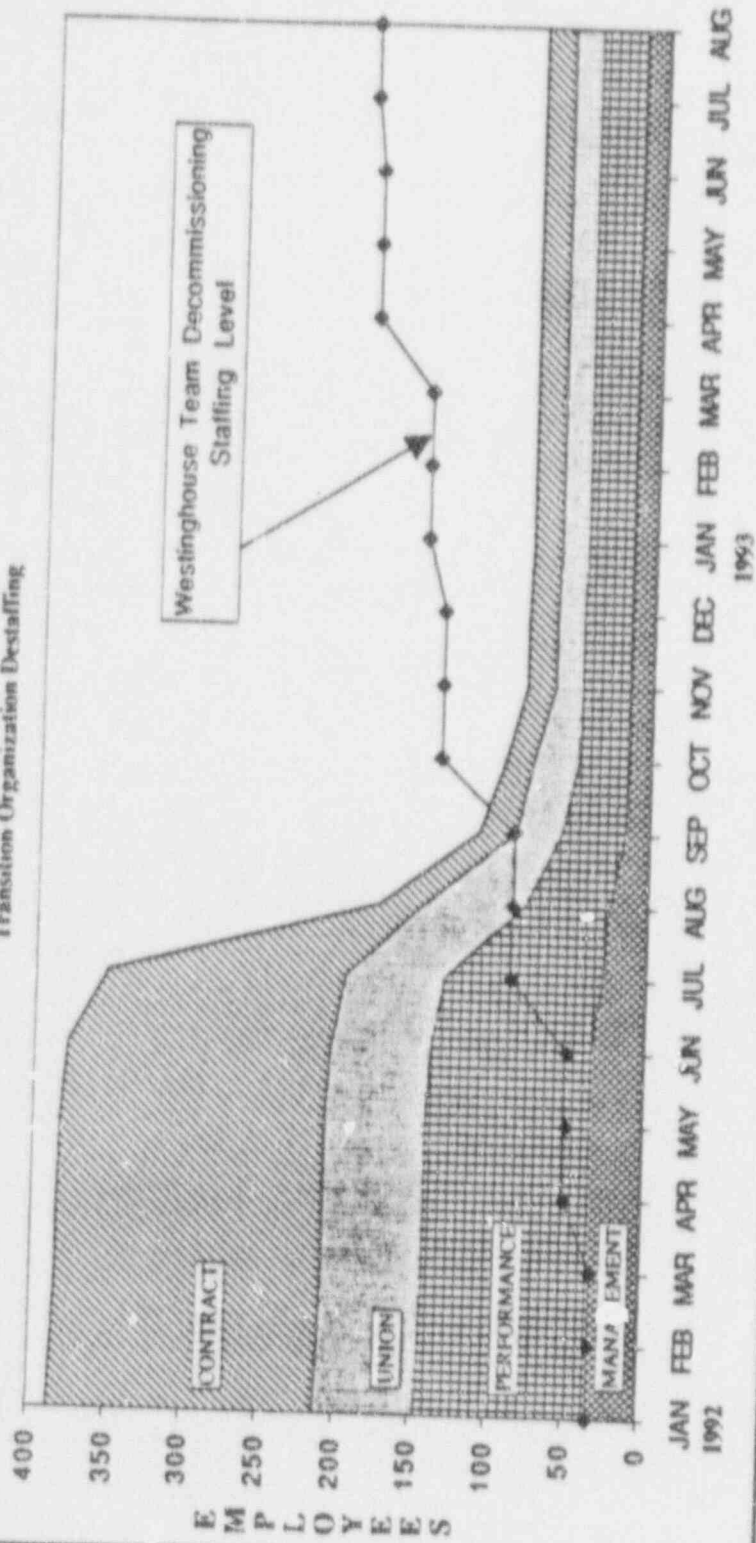
After All Fuel is Removed From Reactor Building, We Will Implement the Decommissioning Structure

### NUCLEAR OPERATIONS PROJECTED 90 DAY NOTIFICATION DATES

	MAY	JUN	JUL	TOTAL
MANAGEMENT	8	6		14
PERFORMANCE	47	14	10	71
OPERATIONS		11		11
MAINTENANCE		22	12	34
HEALTH PHYSICS		2		2
STOREKEEPER		1		1
	55	56	22	133

Final Decommissioning Staff Will Be Sixty-three PSC Employees

Nuclear Operations  
Transition Organization Destaffing



## PERSONNEL ISSUES

NRC and PSC Concerns in Radiological Protection Area in 1990 and 1991 Resulted in Numerous Corrective Actions

- Significantly enhanced the ALARA program
- Major improvements implemented in RWP and dosimetry programs
- ALARA awareness training completed for Maintenance, HP Technicians, Fuel Deck Personnel, and appropriate management
- Dedicated procedures group has been established to prepare new procedures and to respond to changes needed by the user to improve safety, ALARA aspects and overall work performance
- Management team leadership evaluations have been completed
- Increased communication between work groups and organizations
- Much more active coordination of ALARA groups in daily activities

Recent NRC Inspections have Confirmed Improvements in Radiological Protection Program

## PERSONNEL ISSUES (Continued)

Events That Have Occurred During Defueling Have Been Cause for Management Concern in Areas of Industrial Safety, Radiation Safety, Technical Specification/License Compliance and Procedural Compliance/Adequacy

A Number of Actions Have Taken Place or Are Continuing

- All hands safety sessions to obtain feedback and suggestions from employees resulting in Safety Action Plan
- New Electric Production Safety Program implemented
- Revised shift turnover procedures
- Established on-shift training for back shifts
- Established night order book for the Fuel Deck
- Established procedure logic diagram for assistance in planning shift activities
- A revised Action Plan being developed for next shipment of Control Rod Drive Bodies
- Procedures revised to address specific deficiencies and incorporate additional witness points and HP surveys
- Increased training provided to fuel deck personnel and continuing evaluation of human factors aspects of defueling
- Continuing human factors review of defueling procedures with feedback from crews and observation by procedure writers
- Increased management visibility on back shift
- Progressive discipline initiated for several employees

## CONCLUSIONS

PSC is Committed to Safety in All Aspects of Fort St. Vrain Activities

Quality and Radiological Protection Will Not Be Compromised As We Proceed With Defueling and Decommissioning

PSC's Preferred Option is Still to Ship All Spent Fuel to a DOE Facility in Accordance With Our 1965 Contract

PSC is Optimistic That Decommissioning Will Be Completed by End of 1995

Low Level Waste Disposal and Associated Costs Continue to be of Significant Interest to PSC

PSC Recognizes That Employee Attitude Will Continue to Require Close Attention - Management Team Is Taking Necessary Action to Ensure Plant Safety

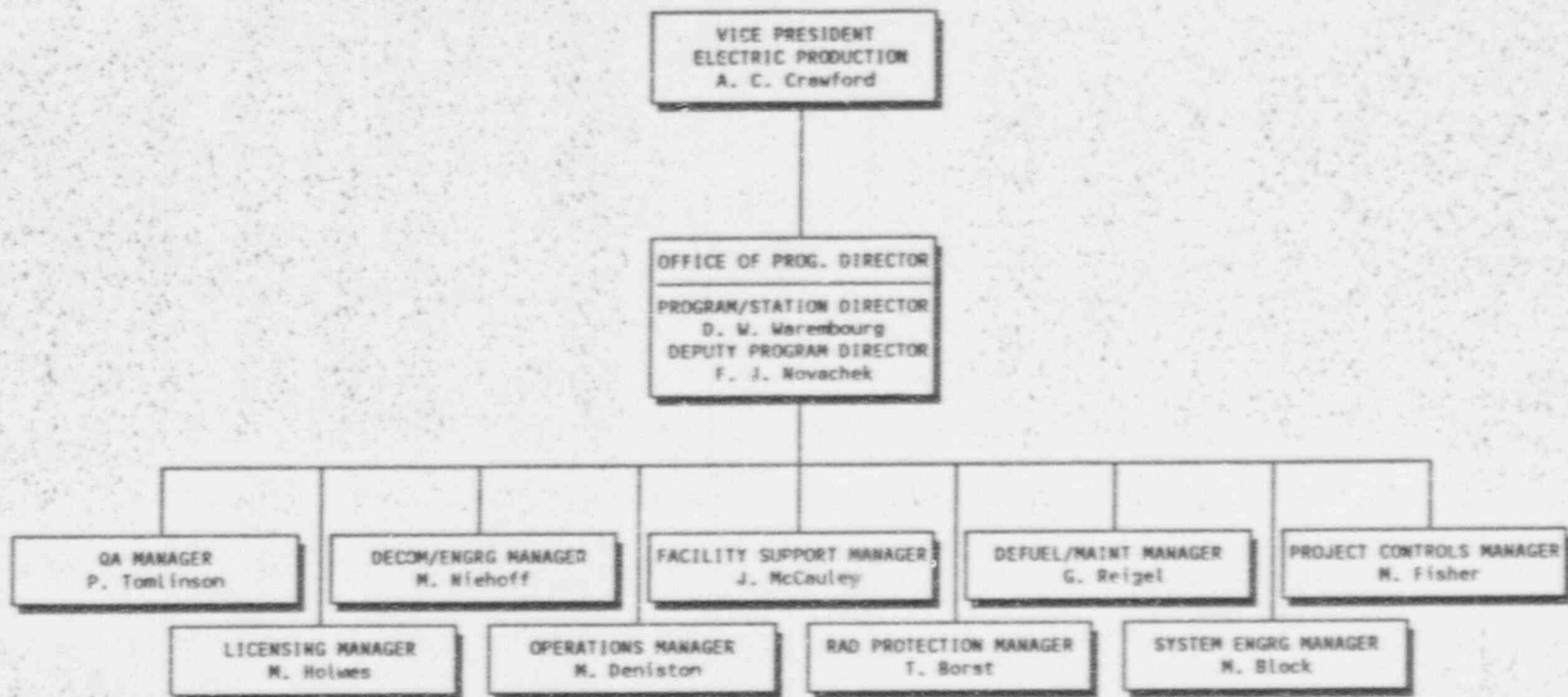
PSC Continues to Be an Active Participant in Community Activities

PSC Continues to Pursue our Core Values of Safety, Excellence and Finding the Better Way

PSC Recognizes the Importance of its Relationship with the NRC and is Committed to Open Communications



NUCLEAR OPERATIONS (DEFUELING PHASE)





FFS DECOMMISSIONING ORGANIZATION

