

16805 WCR 19 1/2, Platteville, CO 80651

May 19, 1992 Fort St. Vrain Unit No. 1 P-92196

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20355

ATTN: Dr. Seymour H. Weiss, Director Non-Power Reactor, Decommissioning and Environmental Project Directorate

Docket No. 50-267

SUBJECT: Request for Early Approval of One Provision of the Procommissioning Technical Specifications

REFERENCE: PSC Letter, Crawford to Weiss, dated March 19, 1992 (P-92115)

Dear Dr. Weiss:

This letter supplements Public Service Company of Colorado's (PSC's) previous request for approval of the Fort St. Vrain (FSV) Decommissioning Technical Specifications (DTS), submitted via the referenced letter. PSC specifically requests early consideration of the DTS provision that deletes current limitations on temperatures of the Prestressed Concrete Reactor Vessel (PCRV) liner cooling water system.

PCRV liner cooling water system temperature limits are currently provided in LCO 4.2.15 in the FSV Technical Specifications. The DTS do not include requirements for PCRV liner cooling water system temperatures. PSC requests that the NRC take early action to approve this provision of the DTS by approving the deletion of LCO 4.2.15 from the current FSV Technical Specifications.

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Public Service Company of Colorau

PO BOX 840

DENVER CO 80201-0840

A. Clegg Crawford Vice President Electric Production P-92196 May 19, 1992 Page 2

PSC requests early consideration of the deletion of PCRV temperature limits to reduce the heat being added to the Reactor Building, and thereby allow a cooler work environment for workers in that area. LCO 4.2.15 currently includes an 85 degree F minimum temperature limit on average PCRV liner cooling water system inlet and outlet temperatures. This requires the addition of heat from steam coils, which results in uncomfortably hot conditions for workers on the refueling floor of the Reactor Building. These hot conditions are further degraded by warm summer weather and are not conducive to peak personnel performance during the remaining fuel removal and plant closure activities.

The temperature limits in LCO 4.2.15 minimized temperature variations within the PCRV concrete during the entire range of operating and shutdown conditions, thereby ensuring its structural integrity. PSC has completed the removal of all nuclear fuel from the PCRV, so there is no longer a need for the PCRV to contain the fission products that could be released from an active core. The PCRV's current functions are to contain the remaining activity and to provide shielding for workers. These functions are identical to the functions that the PCRV will perform during decommissioning. The ability of the PCRV to perform these functions would not be compromised if its temperature was allowed to cool and reach equilibrium with the ambient temperature in the Reactor Building.

As discussed above, PSC requests that the requirements of LCO 4.2.15 be deleted, consistent with the DTS. Accordingly, the following attachments are provided:

Attachment 1 Summary of Proposed Change

Attachment 2 Proposed Change

Attachment 3 Supporting Safety Analysis

The attached safety analysis provides supporting justification for the early action requested. A No Significant Hazards Consideration Analysis in accordance with the standards in 10 CFR 50.92, was provided for the DTS submittal in the referenced letter. PSC's decommissioning authorization and the accompanying revision to the Technical Specifications were noticed in the Federal Register (57 FR 8940) and no public comments were received. In the absence of public comments, PSC requests that this early consideration be approved as soon as reasonably practical, to improve the work environment inside the FSV Reactor Building.

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If you have any questions regarding this matter, please contact Mr. M. H. Holmes at (303) 620-1701.

Very truly yours,

A. Clegg Crawford

Vice President

Electric Production

ACC/SWC/Img

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

REFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of the Facility Operating License)

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UBLIC SERVICE COMPANY OF COLORADO

Application for Amendment to the Facility Operating License License No. DPR-34

OF THE

PUBLIC SERVICE COMPANY OF COLORADO

FOR THE

FORT ST. VRAIN NUCLEAR GENERATING STATION

This application for Amendment to the Finility uneralism License, License No. DPR-34, is submitted for NRC review and a proval.

Respectfully submitted,

PUBLIC SERVICE COMPANY OF COLORADO

By A. Clegg Crawford Vice President Electric Production

KELLY, STANSFIELD & O'FONNELL James K. Tarpey Mark A. Davidson '7th Street Plaza Jenver, Colorado 80202

Attorneys for Applicant

UNITED ' \TES OF AMERICA NUCLEAR REG. LATORY COMMISSION

In the Matter of the Facility Operating License)
of

Public Service Company of Colorado Fort St.

Vrain Unit No. 1

Docket No. 50-267

AFFIDAVIT

A. Crawford, being first duly sworn, deposes and says: That he is Vice President, Electric Production, of Public Service Company of Colorado, the Licensee herein, that he has read the foregoing Application of Amendment to the Facility Operating License and knows the contents thereof, and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

A. Clegg Crawford
Vice President
Electric Production

ST. TE OF Colorado	
courty of Boulder	
Subscribe and sworn to before me, a Notary Public on this 19th day of may, 1992.	

Lack Burns

My commission expires 9/12 , 1992