



Public Service

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Public Service
Company of Colorado

May 20, 1992
Fort St. Vrain
Unit No. 1
P-92201

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

ATTN: Director, Division of Advanced Reactors
& Special Projects

Docket No. 50-267

SUBJECT: Request for Waiver of Compliance, Fort St. Vrain Technical Specification LCO 4.2.15

- REFERENCES:**
1. PSC Letter, Crawford to Weiss, dated May 19, 1992 (P-92196)
 2. NRC Memorandum, Murley to Regional Administrators, dated February 22, 1990 (G-90326)
 3. PSC Letter, Crawford to Weiss, dated March 19, 1992 (P-92115)

Gentlemen:

This letter requests a temporary waiver of compliance from the requirements of Fort St. Vrain (FSV) Technical Specification LCO 4.2.15, Prestressed Concrete Reactor Vessel (PCR/V) Cooling Water System Temperatures. This request is submitted to allow Public Service Company of Colorado (PSC) to cool the Reactor Building and provide a more suitable work environment for remaining fuel removal and plant closure activities.

PSC has removed all nuclear fuel from the PCR/V and is in the process of removing fuel from the fuel storage wells. With no heat source in the vessel, there is no longer a need to control temperatures in the PCR/V concrete. Based on this condition, PSC requested approval to delete LCO 4.2.15 from the FSV Technical Specifications, in Reference 1. Until this Technical Specification revision can be processed and approved, PSC requests a temporary waiver of compliance.

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Approval

In accordance with the provisions of Reference 2, PSC submits the following justification for this request:

1. Requirements For Which the Waiver is Requested.

PSC requests a temporary waiver of compliance from all of the requirements of LCO 4.2.15, PCRV Cooling Water System Temperatures. This LCO specifies limits on:

1. The temperature difference between the cooling water outlet and the external concrete surface (50° F maximum),
2. The outlet water temperature (105° F maximum),
3. The difference between the inlet and outlet water temperature (20° F maximum),
4. The rate of concrete temperature change (14° F per week maximum), and
5. The average temperature of the inlet and outlet water (85° F minimum).

2. Circumstances Surrounding the Situation, Including the Need for Prompt Action; Why the Situation Could Not Have Been Avoided.

All nuclear fuel has been removed 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.

With no heat source in the PCRV, the 85° F minimum average water temperature limitation requires the addition of heat from steam heating coils. This results in uncomfortably hot conditions for workers on the refueling floor of the Reactor Building. These hot conditions, made worse by warm summer weather, are cause for concern for the health and well-being of personnel, as well as overall concern for the performance and safety of remaining defueling and plant closure activities.

The FSV defueling program has progressed smoothly to this point, largely due to exceptional performance of both personnel and equipment. We feel that a reasonably comfortable work environment is very important to the continued safe completion of this project.

PSC had not previously requested relief from LCO 4.2.15 because of a desire to minimize NRC efforts to review Technical Specification amendments, which would divert time and attention away from approval of the FSV Decommissioning Plan. The FSV defueling program originally contemplated the completion of the PCRV defueling at the same time the reactor building defueling was completed, and NRC Decommissioning Plan approval was received. Due to the exceptional performance of defueling personnel and equipment, the PCRV was defueled over two months ahead of schedule, and PCRV temperature controls can be terminated early. This improvement in fuel handling equipment performance was not anticipated based on historical equipment performance data.

3. Compensatory Actions.

No compensatory actions are required.

The functions performed by the PCRV are identical to those that will be performed during decommissioning. No temperature limits are described in the Proposed Decommissioning Plan or in the proposed Decommissioning Technical Specifications. The deletion of LCO 4.2.15 requirements will allow PSC to terminate steam heating of the PCRV liner cooling system. PCRV concrete temperatures will eventually reach equilibrium with Reactor Building ambient temperature. The remaining functions that the PCRV performs will not be compromised if its temperature is allowed to cool in this manner.

4. Evaluation of Safety Significance and Potential Consequences of Proposed Request.

Deleting LCO 4.2.15 PCRV cooling water system temperature requirements was specifically evaluated in the Safety Analysis provided in Reference 1. This analysis concluded that the deletion of these requirements would not adversely affect public health and safety.

5. Justification for Duration of Request.

This waiver of compliance is requested until approval of the deletion of LCO 4.2.15, in response to Reference 1, is received. As noted above, this request will allow the Reactor Building to be cooled, to provide more favorable worker conditions for remaining fuel removal and plant closure activities. There are no safety concerns with deleting LCO 4.2.15 requirements.

6. **Basis for Conclusion that Request Does Not Involve a Significant Hazards Consideration.**

PSC provided a Safety Analysis in Reference 1 that supported the deletion of LCO 4.2.15 temperature limits.

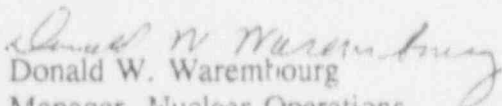
This request is consistent with the Decommissioning Technical Specifications submitted via Reference 3. A No Significant Hazards Consideration Analysis in accordance with the standards of 10 CFR 50.92, was also previously provided in Reference 3. PSC's decommissioning authorization and the accompanying revision to the Technical Specifications were noticed in the Federal Register (57 FR 8940) and no public comments were received.

7. **Basis for Conclusion that Request Does Not Involve Irreversible Environmental Consequences.**

Deletion of LCO 4.2.15 requirements does not involve any areas of the FSV site not previously disturbed during plant construction or operations. This is a plant closure activity that does not preclude any of the decommissioning alternatives and does not increase the overall cost of decommissioning. Also, this action does not involve a major structural modification to the PCRV. Since any decommissioning alternative (SAFSTOR, DECON, or ENTOMB) would allow PCRV temperatures to equilibrate with the Reactor Building ambient, none of PSC's plans or proposals for decommissioning are irreversibly affected by this action.

This request for a temporary waiver of compliance from the requirements of LCO 4.2.15 has been approved by the FSV Plant Operations Review Committee. If you have any questions regarding this information, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,


Donald W. Warembourg
Manager, Nuclear Operations

DWW/SWC

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cc: Dr. Seymour H. Weiss, Director
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Regional Administrator, Region IV

Mr. J. B. Baird
Senior Resident Inspector
Fort St. Vrain

Mr. Robert M. Quillin, Director
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