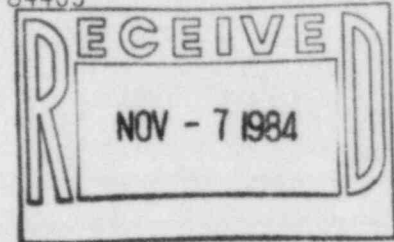




Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

October 30, 1984
Fort St. Vrain
Unit #1
P-84465



Regional Administrator
Reactor Project Branch Chief
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Attn: Mr. Eric Johnson

SUBJECT: MPC DETERMINATION FOR
PARTICULATE RADIONUCLIDES

Dear Mr. Johnson:

In a recent audit of the Fort St. Vrain offsite Dose Calculation Manual (ODCM) by our Nuclear Facility Safety Committee (NFSC), a question was raised regarding the appropriate maximum permissible concentration (MPC) in air for particulate radionuclides. Specifically, ELCO 8.1.1b, Radioactive Gaseous Effluent, Limiting Conditions for Operation, states that, "For purposes of calculating permissible release rates...MPC for halogens and particulates with half-lives longer than eight days will be reduced by a factor of 700 from their listed value in Table II, Column 1 of Appendix B to 10CFR20". In reviewing NUREG-0472, Draft, "Radiological Effluent Technical Specifications for PWR's" and NUREG 0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants", which were used to develop the Fort St. Vrain ODCM, we can find no justification for the 700-fold reduction for particulate MPC's.

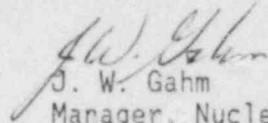
If the MPC reduction for particulates has a technical basis, we would like to receive the appropriate documentation so that our supporting information can be updated and strengthened. If no basis exists for the MPC reduction, we do not feel that ELCO 8.1.1b should be retained as currently written, and we will submit an appropriate Technical Specification Change request in the near future to remove any reference to particulates in ELCO 8.1.1b.

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Your prompt response is appreciated; please contact Mr. Michael Holmes at (303) 571-8409 if you have any questions on this matter.

Sincerely,



J. W. Gahm
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

JWG/d1b