

NOV 05 1984

In Reply Refer To:
Docket: 50-267

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

Dear Mr. Lee:

We have reviewed your resubmittal of the applicable guidance for compliance with 10 CFR 50, Appendix R, which you sent by letter dated August 17, 1984. Our comments and questions are contained in the enclosure. We request that you respond to the enclosure as part of the first and/or second portion of the fire protection review as outlined in your schedule.

Any questions on this subject should be discussed with the NRC project manager.

Since this reporting requirement relates solely to Fort St. Vrain, OBM clearance is not required by PL 96-511.

Sincerely,

Original Signed By
E. H. Johnson

E. H. Johnson, Chief
Reactor Project Branch 1

Enclosure:
NRC Comments and Questions

cc:
(see next page)

<i>for</i>	SPES <i>R.S. Ireland</i>	SPES <i>Rest</i>	RPB1 <i>EH</i>
	PCWagner/1k	REIreland	EHJohnson
	11/2/84	11/2/84	11/2/84

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J. W. Gahm, Manager, Nuclear
Production Division
Fort St. Vrain Nuclear Station
16805 WCR 19½
Platteville, Colorado 80651

L. Singleton, Manager, Quality
Assurance Division
(same address)

C. K. Millen, Senior Vice President
Public Service Company of Colorado
P. O. Box 840
Denver, Colorado 80201

Mr. David Alberstein, 14/159A
GA Technologies, Inc.
P. O. Box 85608
San Diego, California 92138

Kelley, Stansfield & O'Donnell
Public Service Company Building
550 15th Street, Room 900
Denver, Colorado 80202

Chairman, Board of County Comm.
of Weld County, Colorado
Greeley, Colorado 80631

Regional Representative
Radiation Programs
Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80203

Mr. H. L. Brey, Executive Staff
Assistant, Electric Production
Public Service Company of Colorado
P. O. Box 840
Denver, Colorado 80201

bcc distrib. by RIV:

RPB1	Resident Inspector
RPB2	Section Chief (SP&ES)
EP&RPB	P. Wagner, RPB1
RIV File	D. Powers, RPB1
COLORADO STATE DEPT. HEALTH	
G. Lainas, DL	J. Miller, ORB3
J. Taylor, IE	E. Jordan, IE
D. Kubicki, NRR/ASB	W. Shield, ELD
M. Murphy, RIV	

R. D. Martin, RA
MIS System
R. Denise, DRS&P
E. Haycraft, DRSP/LA
D. Eisenhut, D/DL
T. Colburn, ORB3
T. Wambach, NRR/ORB5
L. Whitney, IE

NRC Comments and Questions on Appendix R Submittal

A. Attachment 1

1. We recommend that an implementation schedule be provided with each modification, as that modification is proposed, rather than waiting until 3 weeks after NRC approval of the final portion of your review. We assume that, as required by 10 CFR 50.48, some modifications will be implemented concurrently with the review as inferred from the statement "modifications not complete at that time."
2. Since the basis for accepting possibly higher consequences from a fire in the J and G wall area is, in part, the additional protection provided by an automatic spray system, we question why this modification cannot be implemented in a more timely manner.

B. Attachment 2

1. Item III.D.

The phrase, "prior to considering any postulated fire damage," needs to be explained. Section III.L of Appendix R, which is the basis for the requirements being considered, requires alternate shutdown equipment be powered by an onsite power source following any fire which would require its operation.

2. Item III.I.

The last sentence, referring to equipment being "considered to be manually operable within 1 hour after the start of the fire," needs to be explained. We question the ability to reenter a fire area within 1 hour to operate equipment because of the need to extinguish the fire, remove the smoke and possibly clear away debris. A more prudent approach may be to consider a 2-hour delay in the review and analysis to allow for an orderly reentry. If the analysis does not allow for longer time periods, we would consider shorter than 2-hour periods on a case-by-case basis rather than as a general criteria.