



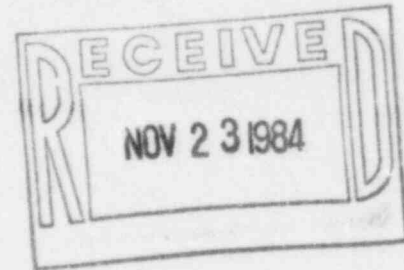
**PUBLIC SERVICE COMPANY OF COLORADO**

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**OSCAR R. LEE**  
VICE PRESIDENT

November 16, 1984  
Fort St. Vrain  
Unit No. 1  
P-84498

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



Attn: Mr. Eric Johnson

DOCKET NO.: 50-267

SUBJECT: Technical Specification Upgrade  
Program

REFERENCE: (1) NRC Letter from H. R. Denton  
to R. F. Walker dated  
October 16, 1984 (G-84392)

Dear Mr. Johnson:

In response to the NRC's concerns expressed in Reference (1) regarding the need to upgrade the Fort St. Vrain Technical Specifications, PSC has formulated a brief summary of a proposed Technical Specification Upgrade Program which is included herein as Attachment 1.

By way of clarifying and defining the scope of the proposed Technical Specification Upgrade Program, PSC has also prepared Attachment 2 to illustrate the extent to which the Standard Technical Specifications for light water reactors would be taken into consideration during the Technical Specification Upgrade Program.

Both Attachment 1 and Attachment 2 were discussed with Messrs. Wagner and Ireland of the NRC by Messrs. Brey and Holmes of PSC during a telephone conversation on November 16, 1984. At the request of Mr. Wagner, these summary Technical Specification Upgrade Program scoping documents are being submitted for your review.

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We believe the Technical Specification Upgrade Program described in Attachment 1 will be fully responsive to the NRC's concerns stated in Reference (1). PSC representatives will be prepared to discuss any questions or comments you may have concerning the Technical Specification Upgrade Program at the meeting scheduled for November 28-29, 1984 at Fort St. Vrain.

If you should have any questions in the interim, please contact Mr. M.H. Holmes at (303) 571-8404.

Very truly yours,



O. R. Lee, Vice President  
Electric Production

ORL/MHH:bb

Attachments

### Scope of the Technical Specification Upgrade Program

PSC will revise the Fort St. Vrain Technical Specifications according to the following commitments:

1. LCO's will be revised to identify the applicable operating modes, limiting condition and action statements defining remedial actions to be taken if the limiting condition is exceeded.
2. All applicable operating modes will be clearly identified for each LCO.
3. Limiting conditions and action statements will agree with FSAR accident and safety analyses.
4. LCO's will cross reference the applicable SR and SR's will cross reference the applicable LCO. All LCO's will have associated with them one or more SR's and all SR's will have associated with them one or more LCO's.
5. Surveillances will be specified as necessary and sufficient to verify compliance with the associated LCO(s).
6. SR's will describe the associated acceptance criteria.
7. Technical Specification statements will be unambiguous with a singular interpretation.
8. Terminology used in the Technical Specifications will be clearly defined.
9. Technical Specifications will be simplified if possible.
10. LCO format will be revised to include the LCO number and title, applicability statement, LCO statement, action statement(s), and cross reference to the associated SR(s).
11. Technical Specifications will be reviewed and expanded as necessary to assure accuracy, completeness and consistency with existing design and safety analysis documentation.
12. The Technical Specifications will account for and utilize existing plant equipment and safety systems.
13. The initial draft of the upgraded Technical Specifications will be submitted to the NRC by April 1, 1985.
14. A schedule for the Technical Specification Upgrade Program will be submitted to the NRC for information by December 14, 1984.

Guidelines for the Utilization of the Standard Technical Specifications for the Fort St. Vrain Technical Specification Upgrade Program.

INTRODUCTION

The Fort St. Vrain Technical Specification Upgrade Program is primarily intended to upgrade the accuracy, completeness and clarity of the existing Fort St. Vrain Technical Specifications, consistent with the licensing basis of the Fort St. Vrain plant as embodied in the FSAR. Standard Technical Specifications for light water reactors will be considered during the Fort St. Vrain Technical Specification Upgrade Program as indicated by these guidelines. Consideration of the Standard Technical Specifications during the Technical Specification Upgrade Program is not intended to be a requirement whose utilization or non-utilization must be substantiated or justified. If instances arise whereby Fort St. Vrain's design features and Technical Specification requirements may represent a possible safety concern relative to Standard Technical Specification requirements, these instances will be addressed as separate licensing issues outside of the scope of the Fort St. Vrain Technical Specification Upgrade Program.

GUIDELINES

1. Plant modifications and backfits would not be undertaken to permit the adoption of any Standard Technical Specification requirement.
2. It is outside the scope of the Fort St. Vrain Technical Specification Upgrade Program to utilize or consider any Standard Technical Specification requirement which opens the licensing basis of the Fort St. Vrain plant for further justification or analysis.
3. Significant research and development efforts or analytical investigations would not be undertaken to determine how to utilize, or whether or not a Standard Technical Specification requirement can be utilized at Fort St. Vrain. Questionable Standard Technical Specifications requiring such efforts and investigations would not be utilized or given further consideration.
4. The numbering system of the Standard Technical Specifications and the Standard Technical Specification format, whereby each LCO is juxtaposed to its associated SR, would not be utilized for the Fort St. Vrain Technical Specification Upgrade Program.
5. The Fort St. Vrain Technical Specification Upgrade Program will adopt relevant Standard Technical Specification definitions where the definitions are consistent with existing plant features and the licensing basis of the Fort St. Vrain plant, i.e. FSAR terminology and analyses.

6. The Fort St. Vrain Technical Specification Upgrade Program will adopt relevant Standard Technical Specification requirements, including limiting conditions for operation, surveillance requirements, and surveillance frequencies, which are consistent with existing plant features and the licensing basis of the Fort St. Vrain plant as embodied in the FSAR.
7. Each Fort St. Vrain Upgraded Technical Specification requirement need only be supported and justified relative to the licensing basis of the Fort St. Vrain plant as embodied in the FSAR, and justification would not be required regarding the Standard Technical Specification treatment of the same or similar requirements for light water reactor plants.