

DmB

NOV 29 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 July 19, 1984, letter that deals with the emergency operating procedures (EOPs) upgrade programs at Fort St. Vrain. In the letter, you requested that TMI Task Action Plan Item I.C.1, "Guidance for the Evaluation and Development of Procedures for Transients and Accidents," be closed based on your efforts to date, and NRC contractor review of the EOPs. You also requested that: (1) development of a Program Generation Package be carried out as part of the Detailed Control Room Design Review (DCRDR), and (2) implementation of a detailed Program Generation Package be delayed until completion of the pre-implementation audit of the DCRDR.

We find it acceptable to implement upgraded EOPs based on a Procedures Generation Package (PGP) after submittal of the DCRDR Summary Report currently scheduled for April 1985. We feel this schedule is acceptable because of the EOP upgrade efforts to date. Further, we believe this would allow proper coordination of the EOP upgrade and DCRDR efforts through the function and task analysis. Upon completion of the DCRDR Summary Report, you should provide a proposed schedule for submission of the PGP (excluding plant-specific technical guidelines) and a proposed schedule for subsequent revision, training, and implementation of the EOPs. We believe approximately 18 months following the DCRDR audit should be sufficient time to complete the EOP upgrade effort.

We have also evaluated whether the EOP upgrade effort could be carried out as a part of another effort related to the upgrade of emergency response capabilities, allowing closure of TMI Task Action Plan Item I.C.1. While there is a common element in the EOP upgrade and DCRDR efforts; namely, the function and task analysis; the elements, objectives and acceptance criteria for the two efforts are significantly different. In addition, the comments included in our May 31, 1984, letter point to the need for a more systematic approach to the upgrading and long-term maintenance of the EOPs at Fort St. Vrain. Based on these considerations, TMI Task Action Plan Item I.C.1 will remain an open issue until an acceptable PGP has been developed and implemented at Fort St. Vrain.

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SPES *RBI*
REIreland
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RPB1 *JM*
EHJohnson
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If you have any questions on this subject, please contact me.

Sincerely,

Philip C. Wagner

Philip C. Wagner
Senior Project Manager

cc:

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