



PUBLIC SERVICE COMPANY OF COLORADO

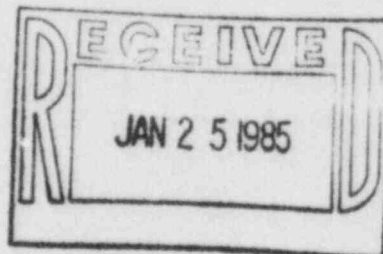
P. O. BOX 840 • DENVER, COLORADO 80201

OSCAR R. LEE
VICE PRESIDENT

January 18, 1985
Fort St. Vrain
Unit No. 1
P-85005

Regional Administrator
Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

ATTN: Mr. E. H. Johnson



Docket No. 50-267

SUBJECT: Fort St. Vrain Fuel Element
Inspection Program

REFERENCE: 1) PSC letter, Warembourg to Johnson,
dated 7/31/84 (P-84246)
2) NRC letter, Johnson to Lee,
dated 10/19/84 (G-84400)

Dear Mr. Johnson:

In response to the NRC positions stated in Reference 2, the Public Service Company of Colorado hereby makes the following commitments to resolve the NRC's concerns regarding Fort St. Vrain fuel surveillance activities:

1. PSC will develop and submit for NRC approval a new Section 7.0, Administrative Controls, Technical Specification which will require: (1) that PSC develop and implement a Fuel Surveillance Program, (2) that PSC obtain NRC approval of the Fuel Surveillance Program, including changes thereto prior to undertaking changes in Fuel Surveillance Program activities, and (3) that PSC report the results of Fuel Surveillance Program activities to the NRC.

8502050448 850118
PDR ADOCK 05000267
P PDR

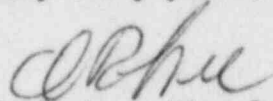
H005
RETURN ORIGINAL
TO RIV 1/0

2. PSC will develop and submit for NRC approval the aforementioned Fuel Surveillance Program document. The Fuel Surveillance Program document will consolidate all previous PSC fuel surveillance commitments which have not been completed by the time the document is submitted for approval. The Fuel Surveillance Program document will encompass the fuel surveillance activities stated in Reference 1, which were previously proposed for direct incorporation into the Fort St. Vrain Technical Specifications.
3. The proposed Technical Specification change and the Fuel Surveillance Program document will be submitted to the NRC for approval by May 1, 1985.

In the proposed Fuel Surveillance Program document, PSC will attempt to clearly distinguish between: (1) PSC fuel surveillance commitments that are responsive to Fort St. Vrain fuel safety concerns, and (2) fuel surveillance activities of a research and development nature whose performance may be subject to the availability of DOE funding. An example of the latter type of fuel surveillance activity is the Post Irradiation Examination of nonreference forms of fuel in the Fuel Test Elements. While the NRC has expressed interest in how nonreference forms of fuel perform, PSC does not agree to fund examinations of fuel forms whose performance is not vital to the verification of Fort St. Vrain fuel safety.

If you have any questions on this matter, please contact Mr. M. H. Holmes at (303) 571-8409.

Very truly yours,



O. R. Lee, Vice President
Electric Production

ORL/MHH:pa

