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July 16, 1992

Mr. Pete J. Cohlma  
Unit Manager  
Environmental Programs  
Public Service Company  
of Colorado  
P.O. Box 840  
Denver, Colorado 80201-0840

Dr. Seymour H. Weiss, Director  
Non-Power Reactor, Decommissioning and Environment  
Project Directorate  
U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

**RE: Tritium Discharge**  
**PSC - Fort Saint Vrain Station**  
**Permit No.: C0-0001121**  
**Weld County**

Dear Mr. Cohlma and Mr. Weiss:

The Water Quality Control Division has reviewed Public Service's letter of June 9, 1992 and analyzed the information we gathered on our tour of the Fort Saint Vrain site on June 17, 1992. The Division is very concerned with the release of tritium into state waters especially as it appears that a finite amount of highly contaminated waste is the source. We feel that additional review of the proposal is necessary. The Division is seeking legal council on what, if any, requirements the state can impose on such a discharge including the ability to require a permit modification before a discharge can occur. The Division will be forwarding a list of questions concerning the discharge in the near future. Three of the items of immediate concern are:

- 1.) What treatment alternatives, other than dilution, were evaluated? Was the "no discharge" scenario evaluated? What are the costs associated with these alternatives? Why were the alternatives discredited?
- 2.) Please supply me with the calculations, including all assumptions, used to determine where in the South Platte River the tritium standard would be met and a map which clearly shows this location.

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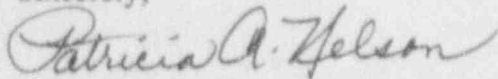
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- 3.) The Division is not supportive of the point of compliance being determined 5 miles downstream of the property boundary. It is required in the state's Water Quality Control Act that effluent limitations be met at the end of the pipe. Is it normally NRC procedure to set in stream compliance points? What is the current effluent limitation for tritium? What is the statutory/regulatory basis which supports the proposed point of compliance?

We are sorry for the inconvenience, however we need assurance that adequate water quality protection is provided. We will be forwarding additional questions to you in the near future. We would appreciate a response to the items above in the near future. Please contact me with any questions or if you feel a meeting would be advantageous.

Sincerely,



Patricia A. Nelson, P.E.  
Industrial Unit Chief  
Permits and Enforcement Section  
WATER QUALITY CONTROL DIVISION

cc- M. H. Holmes, PSC - Fort Saint Vrain  
George Vonesh, PSC  
Ken Weaver, CDH Radiation Control Division  
Don Holmer, Permits and Enforcement, WQCD  
Bob Shukle, Permits and Enforcement, WQCD

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