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September 18, 1992 Fort St. Vrain Unit No. 1 P-92281

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

ATTN: Dr. Seymour H. Weiss, Director

Non-Power Reactor, Decommissioning and

Environmental Project Directorate

Docket No. 50-267

SUBJECT:

Status of Fort St. Vrain Decommissioning Approvals

REFERENCE:

PSC Letter, Warembourg to Director, NRR, dated April 30, 1992

(P-92181)

Dear Dr. Weiss:

In accordance with the requirements of 10 CFR 51.45(d), this letter provides the current status of Federal, State, and local governmental permits, licenses and other approvals related to the decommissioning of Fort St. Vrain. This letter also discusses the status of compliance with applicable environmental quality standards and requirements. These requirements are generally described in Section 8.0 of the FSV Environmental Report Supplement for Decommissioning, previously submitted via the referenced letter.

The following is an updated status of Public Service Company of Colorado's (PSC's) compliance with the environmental quality requirements identified in the FSV Environmental Report Supplement for Decommissioning:

1. Federal Approvals

NRC approval of the Fort St. Vrain Proposed Decommissioning Plan, Facility License, and Decommissioning Technical Specifications is required and is in progress. Pach of these documents is in the final comment resolution stage. No other Federal permits, licenses, or approvals are required for FSV decommissioning activities.

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2. Liquid Effluents

PSC has reached agreement with the Colorado Department of Health, Water Quality Control Division (WQCD), regarding the discharge of tritium in liquid effluent during decommissioning. The WQCD participated in the development of a Tritium Discharge Understanding document. In a letter to the NRC dated August 24, 1992, the WQCD concluded that as long as PSC follows the procedures in this document, the state tritium instream standard of 20,000 pCi/l would be met and that their concerns have therefore been adequately addressed.

The Colorado Wastewater Discharge Permit for Fort St. Vrain is in the process of renewal with the WQCD. A draft permit which will address decommissioning activities is expected to be available for comment in the fourth quarter of 1992. Liquid effluent discharges can continue under the current permit until the revised permit is issued.

Air Emissions

There are currently no air permits applicable to Fort St. Vrain activities. PSC is characterizing all air emission sources at Fort St. Vrain in accordance with the Clean Air Act and Colorado state law. For any sources with criteria emissions that require notification, Air Pollution Emission Notices (APENs) will be prepared for the Colorado Department of Health Air Pollution Control Division (APCD) by the end of 1992. For any sources of air toxics that require notification to the APCD, APFNs will be prepared by the end of 1993.

Asbesios Removal

All necessary permits for asbestos abatement have been received from the Colorado Department of Health, and asbestos removal and disposal activities are currently in progress.

5. Hazardous Waste Generation

No permits or approvals are required for hazardous waste generated during Fort St. Vrain decommissioning activities. PSC has submitted a Notification of Generator Activity letter to the Colorado Department of Health, and an EPA identification number has been assigned to Fort St. Vrain. PSC's contractor, MK Ferguson, has also submitted a Notification of Generator Activity letter to the Colorado Department of Health and they have also received an EPA identification number.

6. Water Wells

Permits for on-site water wells are maintained with the Office of State Engineer, Division of Water Resources. Permits for plant service water wells are current and will not be modified for decommissioning activities. PSC has submitted applications for permanent permitting of 20 new groundwater monitoring wells and modification of permit information for 12 existing groundwater monitoring wells. These permits are expected to be processed by the first quarter of 1993.

Fuel Oil Storage

No new permits or approvals are required for fuel oil storage during Fort St. Vrain decommissioning activities. PSC is currently consolidating on-site fuel oil storage tanks into one underground storage tank. Notification of these plans has been sent to the Chief Oil Inspector for the State of Colorado and to the Colorado Department of Health, Hazardous Materials and Waste Management Division.

8. Auxiliary Boiler Inspection

A certificate of boiler inspection will be maintained for any auxiliary boiler that will be operated during decommissioning. PSC's existing boiler inspections are current and are administered by the Colorado State Boiler Inspection Branch. No changes are required during decommissioning.

9. Radio Communications

No new permits or approvals are required for radio communications during Fort St. Vrain decommissioning activities. All required FCC licenses for internal and external radio and microwave communications are current and are expected to be maintained during decommissioning.

10. Building Permits

A building permit was obtained for the underground fuel oil storage tank consolidation project discussed previously. No buildings are currently anticipated that would require a local building permit. However, if any such buildings become necessary, all required building permits will be obtained from Weid County.

11. Radioactive Waste

PSC currently has a Radioactive Material Disposal Site User's Permit for the Beatty, Nevada site, issued by the State of Nevada, that is valid through the end of 1992. Actions are currently in progress to obtain approval to use the radioactive material disposal site in Richland, Washington after January 1, 1993.

The above information reflects the status of compliance with environmental quality requirements for the early dismantlement and decontamination (DECON) decommissioning alternative, which has been selected for use at Fort St. Vrain. As required by 10 CFR 51, other decommissioning alternatives (e.g., SAFSTOR) were evaluated in the Environmental Report Supplement for Decommissioning. A change to the SAFSTOR alternative would require revision to PSC's application for N&C approval of the Proposed Decommissioning Plan, and to PSC's renewal application for the Fort St. Vrain Colorado Wastewater Discharge Permit. The SAFSTOR alternative could be undertaken in compliance with applicable environmental quality requirements without affecting any other permits or approvals.

This information is considered supplemental to that provided previously in Section 8.0 of the FSV Environmental Report Supplement for Decommissioning. No permits or approvals other than those listed are expected to be required or modified for decommissioning activities at Fort St. Vrain.

If you have any questions regarding this information, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,

Anald W Warembourg

Manager, Nuclear Operations

DWW/SWC

cc: Regional Administrator, Region IV

Mr. J. B. Baird Senior Resident Inspector Fort St. Vrain

Mr. Robert M. Quillin, Director Radiation Control Division Colorado Department of Health

Ms. Pat Nelson Industrial Unit Chief Permits and Enforcement Section Water Quality Control Division Colorado Department of Health