

April 10, 1996

Docket No. 50-267
License No. DPR-34

Mr. A. Clegg Crawford
Vice President, Electric Operations
Public Service Company of Colorado
P.O. Box 840
Denver, Colorado 80201-0840

Dear Mr. Crawford:

SUBJECT:

The Nuclear Regulatory Commission staff has reviewed the Public Service Company of Colorado's (PSC) October 12, 1995, submittal (P-95077), and the PSC March 5, 1996, supplemental submittal (P-96009) both entitled, "Fort St. Vrain Final Survey Plan for Site Release, Proposed Revisions for Survey of Piping Systems and Suspect Affected Survey Units." We are requesting additional information (Enclosure 1) to clarify the proposed modifications for the survey of piping systems and suspect affected survey units.

If you have any questions, please contact David N. Fauver at (301) 415-6625.

Sincerely, *15/*
Clayton L. Pittiglio, Project Manager
Low-Level Waste and
Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated
cc: See attached list

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Mr. A. Clegg Crawford
Vice President, Electric Operations
Public Service Company of Colorado
P.O. Box 840
Denver, Colorado 80201-0840

Dear Mr. Crawford:

SUBJECT: RESPONSE TO THE FORT ST. VRAIN PROPOSED REVISIONS TO FINAL SURVEY
PLAN FOR SITE RELEASE FOR SURVEY OF PIPING SYSTEMS AND SUSPECT
AFFECTED SURVEY UNITS

The Nuclear Regulatory Commission staff has reviewed the Public Service Company of Colorado's (PSC) October 12, 1995, submittal (P-95077), and the PSC March 5, 1996, supplemental submittal (P-96009) both entitled, "Fort St. Vrain Final Survey Plan for Site Release, Proposed Revisions for Survey of Piping Systems and Suspect Affected Survey Units." We are requesting additional information (Enclosure 1) to clarify the proposed modifications for the survey of piping systems and suspect affected survey units.

If you have any questions, please contact David N. Fauver at (301) 415-6625.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clayton L. Pittiglio".

Clayton L. Pittiglio, Project Manager
Low-Level Waste and
Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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COMMENTS ON THE FORT ST. VRAIN PROPOSED REVISIONS TO FINAL SURVEY PLAN FOR SITE RELEASE FOR SURVEY OF PIPING SYSTEMS AND SUSPECT AFFECTED SURVEY UNITS

1. The TLD's appear to provide an acceptable estimate of the average contamination in the pipes. However, the uncertainty of measurements made by individual TLD's, and the ability of individual TLD measurements to demonstrate compliance with maximum contamination limits, has not been sufficiently characterized. The analysis provided in Attachment 1 to PSC's March 5, 1996, response to NRC February 12, 1996, Comment 10, provides only a partial estimate of this uncertainty. Please provide a full characterization of the uncertainty of individual TLD measurements of localized contamination, i.e., small areas of contamination in geometries that differ from the calibration geometry. Are TLD's suited for the quantitative assessment of localized contamination, or should TLD's be considered to quantify average contamination levels only, and to provide qualitative estimates of localized contamination?
2. Based on the uncertainty analysis requested above, please provide justification for the investigation levels provided in PSC's March 5, 1996, response to NRC February 12, 1996, Comment 1. Because of the uncertainty in individual measurement results, it may be appropriate to base investigation levels, and decisions to perform additional decontamination, on lower maximum measurements than proposed by PSC.
3. What percentage of the 1 inch pipes are accessible for survey with the GM detectors if an investigation is required? What actions are proposed if the GM detectors cannot be used? Will additional decontamination be performed?
4. PSC indicates that an investigation will be conducted if the average contamination in a given pipe exceeds 25,000 dpm/100 cm² and is twice the average for the survey unit. This investigation level appears high. The objective of the comment (NRC February 12, 1996, Comment 2) was to ensure that the measurement results from selected pipes are representative of the entire survey unit. The results from individual pipes could indicate a non-representative sample at average contamination levels below 25,000 dpm/100 cm². Please provide additional justification for the selection of the 25,000 dpm/100 cm² value and the "two times survey unit average" value, and why investigation at lower values are not necessary to demonstrate that the survey results in a given pipe are representative of the entire survey unit.

Fort St. Vrain
Docket No. 50-267
License No. DPR-34

Letter dated: April 10, 1996

cc:

Mr. Wayne H. Burnett
President, and
Chief Executive Officer
Public Service Company
of Colorado
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Denver, CO 80201-0840

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