

January 7, 1997

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

SUBJECT: PROPOSED SAMPLING AND SURVEY PLAN FOR THE EFFLUENT PATHWAY,  
FORT ST. VRAIN FINAL SURVEY PROGRAM

Dear Mr. Crawford:

The Nuclear Regulatory Commission staff has reviewed the Public Service Company of Colorado's (PSC) September 11, 1996, submittal (P-96068) entitled, "Proposed Sampling and Survey Plan for Effluent Pathway, Fort St. Vrain Final Survey Program." We have enclosed a number of comments that need to be resolved before final approval of the submittal.

If you have any questions, please contact me, at (301) 415-6702, or David Fauver, at (301) 415-6625.

Sincerely,

[ORIGINAL SIGNED BY:]

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

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

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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If you have any questions, please contact me, at (301) 415-6702, or David 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  
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Fort St. Vrain  
Docket No. 50-267  
License No. DPR-34

Letter dated: January 7, 1997

cc:

Mr. Wayne H. Brunetti  
President, and  
Chief Executive Officer  
Public Service Company  
of Colorado  
P.O. Box 840  
Denver, CO 80201-0840

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

Chairman, Board of County Commissioners  
of Weld County, Colorado  
Greeley, CO 80631

Regional Representative  
Radiation Programs  
Environmental Protection Agency  
1 - Denver Place  
999 18th Street, Suite 1300  
Denver, CO 80202-2413

Radiation Control Division (RCD-DO-B1)  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, CO 80222-1530

Commitment Control Program Coordinator  
Public Service Company of Colorado  
16805 Weld County Road 19-1/2  
Platteville, CO 80651

Mr. M. H. Holmes  
Nuclear Licensing Manager  
Public Service Company of Colorado  
16805 Weld County Road 19-1/2  
Platteville, CO 80651

NRC Comments on Public Service Company of Colorado Submittal, "Proposed Sampling and Survey Plan for Effluent Pathway, Fort Saint Vrain Final Survey Program." September 11, 1996

- 1) The RESRAD analysis for determining the site-specific guideline values used a scenario that assumes the open land areas will continue to be used as pasture land. Additional information is needed to support the assumed future land use and potential future dose to members of the public. PSC should use the default parameters from Scenario C of PG-8-08 to determine the most conservative unrestricted use dose and compare this dose with the dose using the site-specific guideline values PSC believes to be more realistic. Approval of the alternate scenario will depend on the magnitude of the differences between the baseline and guideline values, the time required for the dose from Scenario C to be reduced to acceptable levels by radionuclide decay (which provides an indication of how long the alternate land use scenario would need to be in place), and the strength of the justification for the alternative scenario.
- 2) Were subsurface samples collected during characterization to support the PSC conclusion that contamination is limited to the surface? If so, please provide the results. If not, please provide additional information supporting this conclusion.
- 3) Were each of the soil/sediment samples analyzed for all of the radionuclides listed in Table 7.1? What information was used to select the radionuclides listed in Table 7.1? Why was Sr-90 not included in the table?
- 4) The characterization data were used as the primary justification for reducing the sample size in the effluent pathway survey units. Please provide the effluent pathway characterization results for NRC review. There is insufficient justification provided for not providing sample frequencies consistent with NUREG-5849 for affected areas. If characterization data meet the same data quality objectives as the final survey, these data can be used as final survey data.
- 5) Was the potential for groundwater contamination evaluated?
- 6) The Jay Thomas Ditch was designed as Affected Class 1 thus requiring 100% scan. Table 7.4 designates the area as Affected Class 1 but does not reflect the 100% scan for the Jay Thomas Ditch. What is the basis for this discrepancy?
- 7) What is the area of the sediment storage area?

Enclosure

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If you have any questions, please contact David M. Fauver at (301) 415-66251 or I can be contacted at (301) 415-6702.

Sincerely,  
 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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