



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. DPR-34

PUBLIC SERVICE COMPANY OF COLORADO
FORT ST. VRAIN NUCLEAR GENERATING STATION

DOCKET NO. 50-267

1.0 INTRODUCTION

By letter dated December 23, 1986, Public Service Company of Colorado proposed changes in the technical specifications (TS) of the Fort St. Vrain Nuclear Generating Station. The changes involve the deletion of the snubber tables and a clarification of the requirements for performance of an engineering evaluation on inoperable snubbers. The licensee's application was made in response to NRC Generic Letter 84-13, "Technical Specifications for Snubbers", dated May 3, 1984. These changes are intended to eliminate the need for frequent TS amendments to incorporate changes in the snubber listings. The staff requested additional information from the licensee by letter dated October 19, 1987. The licensee provided this additional information by letter dated December 17, 1987.

2.0 EVALUATION

The NRC staff indicated in the referenced Generic Letter that it had reassessed the inclusion of snubber listings within the TS and concluded that such listings were not necessary provided the snubber TS are modified to specify which snubbers are required to be operable. The licensee's requested changes to the TS would delete the tabular listings of snubbers and add the criteria requiring all snubbers to be operable except those snubbers on non safety-related systems whose failures would have no adverse effects on any safety-related systems.

We have reviewed the current TS together with the proposed changes and compared these changes with the model TS provided in the Generic Letter. From our review, we find that the proposed changes are administrative in nature and do not authorize any physical changes to the plant's safety-related structures, systems or components. Any physical changes in snubber quantities, types or location would have to be reviewed under the provisions of 10 CFR 50.59 to determine if an Unreviewed Safety Question exists. Therefore, the proposed changes would not in any way reduce availability of those snubbers which are provided to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other transient events.

Based on the above discussion and the fact that the proposed changes are consistent with guidance provided in the Generic Letter, we have determined that the proposed changes are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: April 7, 1988

Principal Contributors: M. Hartzman, EMEB/DEST

April 7, 1988

Docket No. 50-267

Mr. R. O. Williams, Jr.
Vice President, Nuclear Operations
Public Service Company of Colorado
Post Office Box 840
Denver, Colorado 80201-0840

Dear Mr. Williams:

SUBJECT: FORT ST. VRAIN NUCLEAR GENERATING STATION, AMENDMENT NO. 59
TO FACILITY OPERATING LICENSE NO. DPR-34 (TAC NO. 64439)

The Commission has issued the enclosed Amendment No. 59 to Facility Operating License No. DPR-34 for the Fort St. Vrain Nuclear Generating Station. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated December 23, 1986 (P-86671) as supplemented by your letter dated December 17, 1987 (P-87412).

The amendment deletes the tabular listing of safety-related snubbers from the Fort St. Vrain Technical Specifications.

A copy of the Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next Bi-weekly Federal Register notice.

Sincerely,

/s/

Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 59 to DPR-34
2. Safety Evaluation

cc w/enclosures:

See next page

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PD4/LADH
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PD4/PM KH
KHeitner:sr
03/24/88

OGC-Rockville
et al - SH
03/24/88

PD4/D MC
JCalvo
03/27/88
ct



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The amendment deletes the tabular listing of safety-related snubbers from the Fort St. Vrain Technical Specifications.

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Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Heitner".

Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

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cc w/enclosures:
See next page

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Public Service Company of Colorado

Fort St. Vrain

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PUBLIC SERVICE COMPANY OF COLORADO

DOCKET NO. 50-267

FORT ST. VRAIN NUCLEAR GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 59
License No. DPR-34

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Public Service Company of Colorado (the licensee) dated December 23, 1986 as supplemented December 17, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

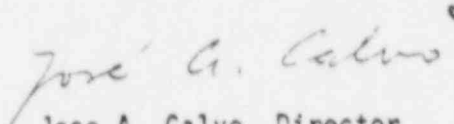
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. DPR-34 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 59, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 7, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 59

FACILITY OPERATING LICENSE NO. DPR-34

DOCKET NO. 50-267

Replace the following pages of the Appendix A Technical Specifications with the attached pages as indicated. the revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
4.3-7	4.3-7
4.3-8	4.3-8
4.3-9 to	-
4.3-16	
5.3-9	5.3-9
5.3-10	5.3-10
5.3-11	5.3-11
5.3-15	5.3-15

Specification LCO 4.3.10 - Shock Suppressors (Snubbers) -
Limiting Condition for Operation

- | a) The reactor shall not be operated at power unless all
| shock suppressors (snubbers) supporting Class I piping
| systems are operable except as noted in b) through d)
| of this LCO.
- | b) With one or more snubbers removed from service in a
| Class I system or subsystem, within 72 hours replace
| or restore the snubber(s) to operable status. If one
| or more snubber(s) is found inoperable, within 72
| hours replace or restore the inoperable snubber(s) and
| perform an engineering evaluation per Specification SR
| 5.3.8.c) on the supported component or declare the
| supported system inoperable and follow the appropriate
| action statement for that system.
- c) If the requirements of a) and b) of this LCO cannot be
met, an orderly shutdown shall be initiated and the
reactor shall be in a low power condition within
36 hours.
- d) If a shock suppressor is determined to be inoperable
while the reactor is in the shutdown or refueling
mode, the suppressor shall be made operable or
replaced prior to reactor operation at power.
- |
|

Basis for Specification LCO 4.3.10

Shock suppressors (snubbers) are designed to prevent unrestrained pipe motion under dynamic loads, as might occur during an earthquake, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping resulting from the dynamic loads produced by a seismic event. It is therefore necessary that all snubbers required to protect the Class I systems, subsystems, or components be operable during reactor power operation.

Because snubber protection is required only during relatively low probability events, a period of 72 hours is allowed for repair or replacement. In case a shutdown is required, the allowance of 36 hours to reach a low power condition will permit an orderly power reduction consistent with standard operating procedures. Since reactor operation at power should not be conducted with defective safety-related equipment, reactor power operation is prohibited with inoperable snubbers, except as stated above.

activity level decreases to less than 10% of the limit of LCO 4.3.8, at which time weekly sampling may be resumed.

Basis for Specification SR 5.3.7

The specification surveillance interval is adequate to monitor the activity of the secondary coolant.

Specification SR 5.3.8 - Shock Suppressors (Snubbers)

Surveillance

The following surveillance requirements apply to all Class I piping system shock suppressors (snubbers):

a) Visual Inspections

The first in-service visual inspection of snubbers shall be performed within six months from issuance of this Technical Specification (Amendment # 39). For the purpose of entering the schedule described in this section, it shall be assumed that the facility had been on a six-month inspection interval.

The first in-service visual inspection of snubbers shall include all Class I piping system snubbers. If less than two snubbers are found inoperable during the first in-service visual inspection, the second in-service visual inspection shall be performed 12 months plus or minus 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>Number of Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*</u>
0	18 Months plus or minus 25%
1	12 Months plus or minus 25%
2	6 Months plus or minus 25%
3, 4	12 ¹ Days plus or minus 25%
5, 6, 7	62 Days plus or minus 25%
8 or more	31 Days plus or minus 25%

*The inspection interval shall not be lengthened more than one step at a time.

b) Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not seized. Snubbers which appear inoperable as a result of visual

Inspections may be determined operable for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible, and (2) the affected snubber is functionally tested in the as-found condition and determined operable per Sections 5.3.8.d) and 5.3.8.e). However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c) Functional Tests

At least once per 18 months (not to exceed 22 1/2 months), a representative sample of each type of snubber shall be tested using one of the following sample plans: The sample plan(s) shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan(s) selected for each type of snubber prior to the test period or the sample plan(s) used in the prior test period shall be implemented:

- 1) At least 10% of the total of the type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of that type that does not meet the functional test acceptance criteria of Specification SR 5.3.8.d) or SR 5.3.8.e), an additional 10% of that type of

f) Exemption From Visual Inspection or Functional Tests

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented.

g) Record Keeping

Record keeping shall consist of:

- 1) A historical record for each snubber shall be maintained.
- 2) Concurrent with the first in-service visual inspection and at least once per refueling cycle thereafter, the historical records for each snubber shall be reviewed to determine any trends that may adversely affect service life.
- 3) The maximum expected service life for the various seals, seal materials, and applications shall be determined and established based on engineering information and the seals shall be replaced so that the maximum expected service life will not be exceeded during a period when the snubber is required to be OPERABLE. This monitoring program shall be fully implemented within 22 1/2 months from the issuance of this Technical Specification (Amendment 39).



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RELATED TO AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. DPR-34

PUBLIC SERVICE COMPANY OF COLORADO
FORT ST. VRAIN NUCLEAR GENERATING STATION

DOCKET NO. 50-267

1.0 INTRODUCTION

By letter dated December 23, 1986, Public Service Company of Colorado proposed changes in the technical specifications (TS) of the Fort St. Vrain Nuclear Generating Station. The changes involve the deletion of the snubber tables and a clarification of the requirements for performance of an engineering evaluation on inoperable snubbers. The licensee's application was made in response to NRC Generic Letter 84-13, "Technical Specifications for Snubbers", dated May 3, 1984. These changes are intended to eliminate the need for frequent TS amendments to incorporate changes in the snubber listings. The staff requested additional information from the licensee by letter dated October 19, 1987. The licensee provided this additional information by letter dated December 17, 1987.

2.0 EVALUATION

The NRC staff indicated in the referenced Generic Letter that it had reassessed the inclusion of snubber listings within the TS and concluded that such listings were not necessary provided the snubber TS are modified to specify which snubbers are required to be operable. The licensee's requested changes to the TS would delete the tabular listings of snubbers and add the criteria requiring all snubbers to be operable except those snubbers on non safety-related systems whose failures would have no adverse effects on any safety-related systems.

We have reviewed the current TS together with the proposed changes and compared these changes with the model TS provided in the Generic Letter. From our review, we find that the proposed changes are administrative in nature and do not authorize any physical changes to the plant's safety-related structures, systems or components. Any physical changes in snubber quantities, types or location would have to be reviewed under the provisions of 10 CFR 50.59 to determine if an Unreviewed Safety Question exists. Therefore, the proposed changes would not in any way reduce availability of those snubbers which are provided to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other transient events.

Based on the above discussion and the fact that the proposed changes are consistent with guidance provided in the Generic Letter, we have determined that the proposed changes are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: April 7, 1988

Principal Contributors: M. Hartzman, EMEB/DEST

April 7, 1988

Docket No. 50-267

Mr. R. O. Williams, Jr.
Vice President, Nuclear Operations
Public Service Company of Colorado
Post Office Box 840
Denver, Colorado 80201-0840

Dear Mr. Williams:

SUBJECT: FORT ST. VRAIN NUCLEAR GENERATING STATION, AMENDMENT NO. 59
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Sincerely,

/s/

Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 59 to DPR-34
2. Safety Evaluation

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EJordan	Plant File

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03/23/88

PD4/PM *KH*
KHeitner:sr
03/24/88

OGC-Rockville
ct d - B. Heitner
~~03/23~~ /88

PD4/D *MC*
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64



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Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - VII,
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Office of Nuclear Reactor Regulation

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Mr. R. O. Williams, Jr.
Public Service Company of Colorado

Fort St. Vrain

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PUBLIC SERVICE COMPANY OF COLORADO

DOCKET NO. 50-267

FORT ST. VRAIN NUCLEAR GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 59
License No. DPR-34

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Public Service Company of Colorado (the licensee) dated December 23, 1986 as supplemented December 17, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. DPR-34 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 59, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jose A. Calvo

Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 7, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 59

FACILITY OPERATING LICENSE NO. DPR-34

DOCKET NO. 50-267

Replace the following pages of the Appendix A Technical Specifications with the attached pages as indicated. the revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
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Specification LCO 4.3.10 - Shock Suppressors (Snubbers) -
Limiting Condition for Operation

- a) The reactor shall not be operated at power unless all shock suppressors (snubbers) supporting Class I piping systems are operable except as noted in b) through d) of this LCO.
- b) With one or more snubbers removed from service in a Class I system or subsystem, within 72 hours replace or restore the snubber(s) to operable status. If one or more snubber(s) is found inoperable, within 72 hours replace or restore the inoperable snubber(s) and perform an engineering evaluation per Specification SR 5.3.8.c) on the supported component or declare the supported system inoperable and follow the appropriate action statement for that system.
- c) If the requirements of a) and b) of this LCO cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a low power condition within 36 hours.
- d) If a shock suppressor is determined to be inoperable while the reactor is in the shutdown or refueling mode, the suppressor shall be made operable or replaced prior to reactor operation at power.

|
|
Basis for Specification LCO 4.3.10

Shock suppressors (snubbers) are designed to prevent unrestrained pipe motion under dynamic loads, as might occur during an earthquake, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping resulting from the dynamic loads produced by a seismic event. It is therefore necessary that all snubbers required to protect the Class I systems, subsystems, or components be operable during reactor power operation.

Because snubber protection is required only during relatively low probability events, a period of 72 hours is allowed for repair or replacement. In case a shutdown is required, the allowance of 36 hours to reach a low power condition will permit an orderly power reduction consistent with standard operating procedures. Since reactor operation at power should not be conducted with defective safety-related equipment, reactor power operation is prohibited with inoperable snubbers, except as stated above.

activity level decreases to less than 10% of the limit of LCO 4.3.8, at which time weekly sampling may be resumed.

Basis for Specification SR 5.3.7

The specification surveillance interval is adequate to monitor the activity of the secondary coolant.

Specification SR 5.3.8 - Shock Suppressors (Snubbers)
Surveillance

The following surveillance requirements apply to all Class I piping system shock suppressors (snubbers):

a) Visual Inspections

The first in-service visual inspection of snubbers shall be performed within six months from issuance of this Technical Specification (Amendment 39). For the purpose of entering the schedule described in this section, it shall be assumed that the facility had been on a six-month inspection interval.

The first in-service visual inspection of snubbers shall include all Class I piping system snubbers. If less than two snubbers are found inoperable during the first in-service visual inspection, the second in-service visual inspection shall be performed 12 months plus or minus 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>Number of Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*</u>
0	18 Months plus or minus 25%
1	12 Months plus or minus 25%
2	6 Months plus or minus 25%
3, 4	124 Days plus or minus 25%
5, 6, 7	62 Days plus or minus 25%
8 or more	31 Days plus or minus 25%

*The inspection interval shall not be lengthened more than one step at a time.

b) Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not seized. Snubbers which appear inoperable as a result of visual

inspections may be determined operable for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible, and (2) the affected snubber is functionally tested in the as-found condition and determined operable per Sections 5.3.8.d) and 5.3.8.e). However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c) Functional Tests

At least once per 18 months (not to exceed 22 1/2 months), a representative sample of each type of snubber shall be tested using one of the following sample plans: The sample plan(s) shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan(s) selected for each type of snubber prior to the test period or the sample plan(s) used in the prior test period shall be implemented:

- 1) At least 10% of the total of the type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of that type that does not meet the functional test acceptance criteria of Specification SR 5.3.8.d) or SR 5.3.8.e), an additional 10% of that type of

f) Exemption From Visual Inspection or Functional Tests

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented.

g) Record Keeping

Record keeping shall consist of:

- 1) A historical record for each snubber shall be maintained.
- 2) Concurrent with the first in-service visual inspection and at least once per refueling cycle thereafter, the historical records for each snubber shall be reviewed to determine any trends that may adversely affect service life.
- 3) The maximum expected service life for the various seals, seal materials, and applications shall be determined and established based on engineering information and the seals shall be replaced so that the maximum expected service life will not be exceeded during a period when the snubber is required to be OPERABLE. This monitoring program shall be fully implemented within 22 1/2 months from the issuance of this Technical Specification (Amendment 39).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. DPR-34

PUBLIC SERVICE COMPANY OF COLORADO
FORT ST. VRAIN NUCLEAR GENERATING STATION

DOCKET NO. 50-267

1.0 INTRODUCTION

By letter dated December 23, 1986, Public Service Company of Colorado proposed changes in the technical specifications (TS) of the Fort St. Vrain Nuclear Generating Station. The changes involve the deletion of the snubber tables and a clarification of the requirements for performance of an engineering evaluation on inoperable snubbers. The licensee's application was made in response to NRC Generic Letter 84-13, "Technical Specifications for Snubbers", dated May 3, 1984. These changes are intended to eliminate the need for frequent TS amendments to incorporate changes in the snubber listings. The staff requested additional information from the licensee by letter dated October 19, 1987. The licensee provided this additional information by letter dated December 17, 1987.

2.0 EVALUATION

The NRC staff indicated in the referenced Generic Letter that it had reassessed the inclusion of snubber listings within the TS and concluded that such listings were not necessary provided the snubber TS are modified to specify which snubbers are required to be operable. The licensee's requested changes to the TS would delete the tabular listings of snubbers and add the criteria requiring all snubbers to be operable except those snubbers on non safety-related systems whose failures would have no adverse effects on any safety-related systems.

We have reviewed the current TS together with the proposed changes and compared these changes with the model TS provided in the Generic Letter. From our review, we find that the proposed changes are administrative in nature and do not authorize any physical changes to the plant's safety-related structures, systems or components. Any physical changes in snubber quantities, types or location would have to be reviewed under the provisions of 10 CFR 50.59 to determine if an Unreviewed Safety Question exists. Therefore, the proposed changes would not in any way reduce availability of those snubbers which are provided to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other transient events.

Based on the above discussion and the fact that the proposed changes are consistent with guidance provided in the Generic Letter, we have determined that the proposed changes are acceptable.

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3.0 ENVIRONMENTAL CONSIDERATION

The amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: April 7, 1988

Principal Contributors: M. Hartzman, EMEB/DEST

April 7, 1988

Docket No. 50-267

Mr. R. O. Williams, Jr.
Vice President, Nuclear Operations
Public Service Company of Colorado
Post Office Box 840
Denver, Colorado 80201-0840

Dear Mr. Williams:

SUBJECT: FORT ST. VRAIN NUCLEAR GENERATING STATION, AMENDMENT NO. 59
TO FACILITY OPERATING LICENSE NO. DPR-34 (TAC NO. 64439)

The Commission has issued the enclosed Amendment No. 59 to Facility Operating License No. DPR-34 for the Fort St. Vrain Nuclear Generating Station. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated December 23, 1986 (P-86671) as supplemented by your letter dated December 17, 1987 (P-87412).

The amendment deletes the tabular listing of safety-related snubbers from the Fort St. Vrain Technical Specifications.

A copy of the Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next Bi-weekly Federal Register notice.

Sincerely,

/s/

Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 59 to DPR-34
2. Safety Evaluation

cc w/enclosures:

See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
April 7, 1988

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Vice President, Nuclear Operations
Public Service Company of Colorado
Post Office Box 840
Denver, Colorado 80201-0840

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Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Heitner".

Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 59 to DPR-34
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. R. O. Williams, Jr.
Public Service Company of Colorado

Fort St. Vrain

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PUBLIC SERVICE COMPANY OF COLORADO

DOCKET NO. 50-267

FORT ST. VRAIN NUCLEAR GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 59
License No. DPR-34

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Public Service Company of Colorado (the licensee) dated December 23, 1986 as supplemented December 17, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

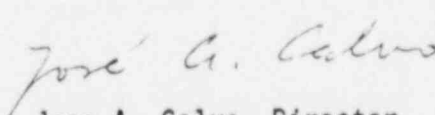
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. DPR-34 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 59, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 7, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 59

FACILITY OPERATING LICENSE NO. DPR-34

DOCKET NO. 50-267

Replace the following pages of the Appendix A Technical Specifications with the attached pages as indicated. the revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
4.3-7	4.3-7
4.3-8	4.3-8
4.3-9 to	-
4.3-16	
5.3-9	5.3-9
5.3-10	5.3-10
5.3-11	5.3-11
5.3-15	5.3-15

Specification LCO 4.3.10 - Shock Suppressors (Snubbers) -
Limiting Condition for Operation

- a) The reactor shall not be operated at power unless all shock suppressors (snubbers) supporting Class I systems are operable except as noted in b) through d) of this LCO.
- b) With one or more snubbers removed from service in a Class I system or subsystem, within 72 hours replace or restore the snubber(s) to operable status. If one or more snubber(s) is found inoperable, within 72 hours replace or restore the inoperable snubber(s) and perform an engineering evaluation per Specification SR 5.3.8.c) on the supported component or declare the supported system inoperable and follow the appropriate action statement for that system.
- c) If the requirements of a) and b) of this LCO cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a low power condition within 36 hours.
- d) If a shock suppressor is determined to be inoperable while the reactor is in the shutdown or refueling mode, the suppressor shall be made operable or replaced prior to reactor operation at power.

Basis for Specification LCO 4.3.10

Shock suppressors (snubbers) are designed to prevent unrestrained pipe motion under dynamic loads, as might occur during an earthquake, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping resulting from the dynamic loads produced by a seismic event. It is therefore necessary that all snubbers required to protect the Class I systems, subsystems, or components be operable during reactor power operation.

Because snubber protection is required only during relatively low probability events, a period of 72 hours is allowed for repair or replacement. In case a shutdown is required, the allowance of 36 hours to reach a low power condition will permit an orderly power reduction consistent with standard operating procedures. Since reactor operation at power should not be conducted with defective safety-related equipment, reactor power operation is prohibited with inoperable snubbers, except as stated above.

activity level decreases to less than 10% of the limit of LCO 4.3.8, at which time weekly sampling may be resumed.

Basis for Specification SR 5.3.7

The specification surveillance interval is adequate to monitor the activity of the secondary coolant.

Specification SR 5.3.8 - Shock Suppressors (Snubbers)

Surveillance

The following surveillance requirements apply to all Class I piping system shock suppressors (snubbers):

a) Visual Inspections

The first in-service visual inspection of snubbers shall be performed within six months from issuance of this Technical Specification (Amendment 39). For the purpose of entering the schedule described in this section, it shall be assumed that the facility had been on a six-month inspection interval.

The first in-service visual inspection of snubbers shall include all Class 7 piping system snubbers. If less than two snubbers are found inoperable during the first in-service visual inspection, the second in-service visual inspection shall be performed 12 months plus or minus 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>Number of Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*</u>
0	18 Months plus or minus 25%
1	12 Months plus or minus 25%
2	6 Months plus or minus 25%
3, 4	124 Days plus or minus 25%
5, 6, 7	62 Days plus or minus 25%
8 or more	31 Days plus or minus 25%

*The inspection interval shall not be lengthened more than one step at a time.

b) Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not seized. Snubbers which appear inoperable as a result of visual

inspections may be determined operable for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible, and (2) the affected snubber is functionally tested in the as-found condition and determined operable per Sections 5.3.8.d) and 5.3.8.e). However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c) Functional Tests

At least once per 18 months (not to exceed 22 1/2 months), a representative sample of each type of snubber shall be tested using one of the following sample plans: The sample plan(s) shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan(s) selected for each type of snubber prior to the test period or the sample plan(s) used in the prior test period shall be implemented:

- 1) At least 10% of the total of the type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of that type that does not meet the functional test acceptance criteria of Specification SR 5.3.8.d) or SR 5.3.8.e), an additional 10% of that type of

f) Exemption From Visual Inspection or Functional Tests

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented.

g) Record Keeping

Record keeping shall consist of:

- 1) A historical record for each snubber shall be maintained.
- 2) Concurrent with the first in-service visual inspection and at least once per refueling cycle thereafter, the historical records for each snubber shall be reviewed to determine any trends that may adversely affect service life.
- 3) The maximum expected service life for the various seals, seal materials, and applications shall be determined and established based on engineering information and the seals shall be replaced so that the maximum expected service life will not be exceeded during a period when the snubber is required to be OPERABLE. This monitoring program shall be fully implemented within 22 1/2 months from the issuance of this Technical Specification (Amendment 39).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 59 TO FACILITY OPERATING LICENSE NO. DPR-34

PUBLIC SERVICE COMPANY OF COLORADO
FORT ST. VRAIN NUCLEAR GENERATING STATION

DOCKET NO. 50-267

1.0 INTRODUCTION

By letter dated December 23, 1986, Public Service Company of Colorado proposed changes in the technical specifications (TS) of the Fort St. Vrain Nuclear Generating Station. The changes involve the deletion of the snubber tables and a clarification of the requirements for performance of an engineering evaluation on inoperable snubbers. The licensee's application was made in response to NRC Generic Letter 84-13, "Technical Specifications for Snubbers", dated May 3, 1984. These changes are intended to eliminate the need for frequent TS amendments to incorporate changes in the snubber listings. The staff requested additional information from the licensee by letter dated October 19, 1987. The licensee provided this additional information by letter dated December 17, 1987.

2.0 EVALUATION

The NRC staff indicated in the referenced Generic Letter that it had reassessed the inclusion of snubber listings within the TS and concluded that such listings were not necessary provided the snubber TS are modified to specify which snubbers are required to be operable. The licensee's requested changes to the TS would delete the tabular listings of snubbers and add the criteria requiring all snubbers to be operable except those snubbers on non safety-related systems whose failures would have no adverse effects on any safety-related systems.

We have reviewed the current TS together with the proposed changes and compared these changes with the model TS provided in the Generic Letter. From our review, we find that the proposed changes are administrative in nature and do not authorize any physical changes to the plant's safety-related structures, systems or components. Any physical changes in snubber quantities, types or location would have to be reviewed under the provisions of 10 CFR 50.59 to determine if an Unreviewed Safety Question exists. Therefore, the proposed changes would not in any way reduce availability of those snubbers which are provided to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other transient events.

Based on the above discussion and the fact that the proposed changes are consistent with guidance provided in the Generic Letter, we have determined that the proposed changes are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: April 7, 1988

Principal Contributors: M. Hartzman, EMEB/DEST