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R.O. WILLIAMS, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

February 3, 1988
Fort St. Vrain
Unit No. 1
P-88046

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

Attention: Mr. Jose A. Calvo
Director, Project Directorate IV

Docket No. 50-267

SUBJECT: PSC COMMENTS ON REVISED NRC FIRE PROTECTION SAFETY EVALUATION

REFERENCES:
1) NRC letter, Heitner to Williams, dated December 18, 1987 (G-87454)
2) PSC letter, Williams to Berkow, dated January 16, 1987 (P-87013)
3) PSC letter, Walker to Berkow, dated December 20, 1985 (P-85488)
4) PSC letter, Williams to Calvo, dated December 15, 1987 (P-87422)

Dear Mr. Calvo:

PSC has reviewed the NRC's revised Fort St. Vrain Fire Protection Safety Evaluation in Reference 1. PSC's comments are mostly editorial suggestions and are noted in the attached marked up draft Safety Evaluation. Most of these markups are self explanatory. A few merit a brief explanation, as described below:

A006

Section 1.0

PSC considers that the NRC's previously issued Safety Evaluations on fire protection for the Three Room Control Complex should be referenced as part of the FSV fire protection regulatory guidance to complete the itemization of applicable NRC regulatory guidance to FSV on fire protection. Accordingly, these have been noted in the FSV Fire Protection Program Plan Section 1.2 and should be specified by the NRC in Section 1.0 of the SER as well.

Section 1.2

PSC considers that the schedular exemption from 10 CFR 50.48 requested in FSV's Appendix R Evaluation should be addressed and granted in this Safety Evaluation since it has not been officially approved yet. This involves adding a Section 2.13 to the SER on this subject.

Section 2.1

PSC notes that the NRC has chosen to use the term "post fire shutdown system" to denote the "FSV Fire Protection Shutdown/Cooldown" model, which is different from the FSV "safe shutdown" systems occasionally used in the draft Safety Evaluation. PSC has utilized the "post fire shutdown system" language where it may not have been included throughout the safety evaluation.

Section 2.1.2.1

The following sentence was added to the safety evaluation based on PSC's comments of January, 1987 in Reference 2:

> "The post fire shutdown procedure includes an instruction that should nuclear instrumentation be unavailable, operators are to activate the use of the Reserve Shutdown System, in shutting down following a fire event."

This PSC comment was an explanatory enhancement, based on PSC's inclusion of such an instruction in FSV procedure SSCHDPC, "Safe Shutdown and Cooling with Highly Degraded Plant Conditions", as noted in Reference 3. The PSC Response to NRC Question 14 in Reference 3 justified that source range flux monitoring was unnecessary following a fire at FSV, since like a BWR there could be no fire-induced boron dilution. As an additional safeguard PSC stated,

> "If following a fire the neutron monitoring instrumentation is lost or indication appears to be erroneous, the Reserve Shutdown Procedure will be activated.

This requirement was in addition to the FSV Interim Technical Specification LCOs 3.1.4 and 3.1.6., which require full insertion of sufficient control rods to achieve the specified shutdown margin, as verified by operable rod position indication, or the actuation of sufficient reserve shutdown material to achieve the specified shutdown margin, when the reactor is shutdown.

When FSV procedure SSCHDPC, "Safe Shutdown and Cooling with Highly Degraded Plant Conditions", was superceded by procedure SSC-03, "Recovering From a NonCongested Cable Area Fire Resulting in an Interruption of Forced Circulation" and the commitments in Reference 3 were superceded by the FSV Fire Protection Program Plan submitted to the NRC in Reference 4, this requirement was deleted in an effort to standardize operator actions in accident events. The applicable Technical Specifications and operator training on them are sufficient to ensure the timely actuation of the Reserve Shutdown System, if necessary, following a fire event. Therefore the additional neutron monitoring instrumentation induced actuation of the Reserve Shutdown System is not necessary, and should be deleted.

Section 2.1.2.2

PSC suggests adding the conclusion from PSC's most recent analysis concerning the effects of no liner cooling system operation on the PCRV during functioning of the FSV Fire Protection Shutdown/Cooldown model, as an enhancement to the safety evaluation.

Section 2.1.2.3

PSC noted a suggested revision of the flow path description of the FSV Fire Protection Shutdown/Cooldown Train A to more accurately reflect the model in this section. PSC suggests revising Reference 16 in the draft SER to reflect PSC's most recent analysis instead of the superceded analysis referenced.

Section 2.1.3.1

PSC has included suggested wording concerning the verification of the FSV fire protection equipment operability requirements, which were recently submitted to the NRC in Reference 4.

If you have any questions concerning these comments, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,

R. O. Williams, Jr.
Vice President,
Nuclear Operations

cc: Regional Administrator, Region IV
ATT: Mr. T. F. Westerman, Chief
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 18, 1987

G-87454
Rec'd. 12-29-87

Docket No. 50-267

Mr. R. O. Williams, Jr.
Vice President, Nuclear Operations
Public Service Company of Colorado
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Dear Mr. Williams:

SUBJECT: REVISED FIRE PROTECTION SAFETY EVALUATION FOR COMMENT (TAC NO. 54373)

We have reviewed your comments on our earlier draft fire protection safety evaluation (SE) dated November 18, 1986. Your comments were submitted by letter dated January 16, 1987 (P-87013). Additionally, we have updated the SE to reflect certain changes you have proposed to your post-fire safe shutdown model, as described in your letter dated May 15, 1987 (P-87167). Our revised SE is enclosed for your comments.

As noted in the SE, a number of items are left open for verification through inspection. The inspection of these items will be scheduled separately, but you are responsible for maintaining these items in an acceptable condition.

We have also held a number of discussions with your staff concerning the listing of fire protection modifications yet to be completed. The most recent update of this list is your submittal dated April 29, 1987 (P-87160). We find it acceptable for you to modify this list and inform the Commission at regular intervals of your changes. However, the overall goal of completing all fire protection modifications by startup following the fourth refueling should not be compromised.

We request you provide your final comments within 60 days of the date of this letter. The information requested in this letter affects fewer than 10 respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Kenneth L Heitner

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

Enclosure:
As stated

cc w/enclosure:
See next page

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