



**Public Service™**

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Company of Colorado**  
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August 18, 1988  
Fort St. Vrain  
Unit No. 1  
P-88302

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

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

Docket No. 50-267

SUBJECT: Proposed Record Storage Center at  
Fort St. Vrain (TAC No. 61578)

REFERENCE: See Page 3

Gentlemen:

In Reference 1, PSC received a notice of deviation in NRC Inspection 85-16 concerning the fire rating of a door in the Records Center file room at Fort St. Vrain. In References 2 and 3, PSC provided the NRC information concerning the proposed construction of a new records storage facility. The new facility was expected to resolve the inspection deviation.

Although, PSC had intended to construct a new records storage facility, the plant writedown in October, 1986 resulted in a re-evaluation of proposed construction projects. PSC has determined that a new facility is not economically prudent at this time and has therefore, postponed indefinitely construction of the new records storage facility as originally envisioned. Given the postponement of the new facility, PSC is evaluating the feasibility of making some modifications to the existing facility. In this evaluation, however, the disparity of fire ratings recommended by different versions of ANSI N45.2.9 must be resolved.

The Fort St. Vrain FSAR, Section B.5.19.9 describes PSC's application of ANSI Standard N45.2.9-1974 to quality assurance records associated with the operation of Fort St. Vrain. Although not explicitly addressed in the FSAR, the rating of fire doors within the records

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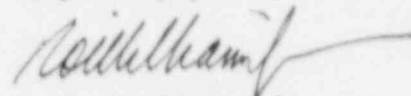
storage facility is covered by ANSI N45.2.9-1974, Paragraph 5.6 which states, "Structures, doors, frames and hardware should be Class A fire rated with a recommended four hour minimum rating." The Fort St. Vrain Records Center was constructed before the issuance of ANSI N45.2.9-1974 and PSC has not specifically made exception to this standard concerning fire protection requirements (as noted in Reference 1). PSC, however, does not consider a recommended rating to be explicitly binding. Additionally, PSC has been unable to locate a vendor which is able to supply 4 hour fire rated components.

In 1979, ANSI Standard N45.2.9 was revised to require that, "Structures, doors, frames and hardware shall be designed to comply with a minimum two hour fire rating." Given the fire rating disparity between the 1974 and 1979 versions of ANSI N45.2.9, PSC proposes to revise FSAR Section B.5.19.9 to explicitly exempt the FSV records center from the recommended four hour minimum rating and class A designation and would substitute a commitment to a 3 hour fire rating for the structure, doors, frames and hardware. This is consistent with doors and hardware more readily available from vendors and is yet more conservative than ANSI N45.2.9-1979.

PSC considers this request to fall under the provisions of 10CFR50.54(a)(3) and therefore requests NRC concurrence so that the deviation identified in Inspection 85-16 can be resolved, and evaluations of modifications to the Records Center can be completed. Attached are marked up pages for FSAR Appendix B reflecting PSC's proposed changes. Upon receipt of NRC concurrence, PSC will revise FSAR Section B.5.19.9 to reflect this change. PSC will also keep the NRC abreast of any modification plans and schedules for the Records Center as they are developed.

Should you have any questions concerning this issue, please contact Mr. M. H. Holmes at (303) 480-6960 for further information.

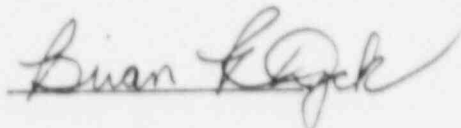
Very truly yours,



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

ROW:DG/brc

Reviewed by:



Attachment

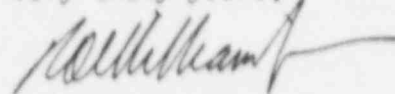
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R. O. Williams, Jr.  
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Attachment

References

1. NRC letter, Johnson to Lee dated August 13, 1985 (G-85327)
2. PSC letter, Warembourg to Johnson dated September 10, 1985 (P-85310)
3. PSC letter, Warembourg to Berkow dated April 25, 1986 (P-86069)
4. NRC letter, Hinson to Williams dated September 18, 1986 (G-86507)
5. PSC letter, Warembourg to Berkow dated August 15, 1986 (P-86516)
6. PSC letter, Williams to Calvo dated December 15, 1987 (P-87422)

Attachment

Cleaning (Section 2.4)

Implementation of ANSI N45.2.1 is specified by separate documentation. (See B.5.19.2)

Receiving, Storage and Handling (Section 2.5)

Implementation of ANSI N45.2.2 is specified by separate documentation. (See B.5.19.3)

Housekeeping (Section 2.6)

Implementation of ANSI N45.2.3 is specified by separate documentation. (See B.5.19.4)

Personnel Qualification (Section 2.7)

Implementation of ANSI N45.2.6 is specified by separate documentation. (See B.5.19.7)

B.5.19.9. ANSI N45.2.9-1974 Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.88 shall be applied to quality assurance records associated with operation of Fort St. Vrain Unit No. 1.

Those design, manufacturing, construction and operating records generated prior to implementation of this standard are not backfitted to the detailed requirements of this standard. All such records, however, are designated initially for lifetime storage. Until specific review dictates otherwise, they will be stored in the permanent record storage facility. Appropriate record indexes and filing systems permit reasonable identification and retrieval. The records are stored and preserved per the requirements of Section 5.0 of this standard.

Insert →

(c) ~~LA~~ Specific Comments

Safekeeping (Section 5.5)

The Records Storage Building is located at the plant site within the site access control fence. During off-duty hours the facility is kept locked and is monitored by regular guard patrols under the auspices of the plant security program.

Insert for FSAR Section B.5.19.9

(b) Specific Exceptions

Facility (Section 5.6)

The Records Storage Building shall be designed to comply with a minimum three hour fire rating.

The records stored in the Records Storage Building shall be afforded the protection provided by a three hour minimum fire rated facility.



Facility (Section 5.6)

A records storage building has been constructed onsite to provide for storage of records. This facility was constructed to provide adequate record protection to prevent destruction by fire, theft, flooding and vandalism.

B.5.19.10. ANSI N45.2.10-1973 Quality Assurance Terms and Definitions

The quality assurance terms and definitions contained in this standard shall be used as guidance and applied as appropriate to the Operational QA Program for Fort St. Vrain Unit No. 1.

There may be instances where existing procedures contain definitions that may not be in strict accordance with those provided by this standard. As existing procedures are revised, however, such definitions shall be evaluated to determine if the intent of definitions meets the intent of those provided by this standard.

B.5.19.11. ANSI N45.2.11-1974 Quality Assurance Requirements for Design of Nuclear Power Plants

The guidance provided by this standard and the associated Regulatory Guide 1.64 Rev. 2 (except for exceptional circumstances described in Section B.5.3.4.f.) shall be applied to design activities involving modification work controlled by the QA Program and the revision or development of plant design documents occurring during operation of Fort St. Vrain Unit No. 1.

Where codes, standards or design requirements are referenced, or are incorporated into the standard by references, which are in conflict with original design commitments as set forth in the FSAR, the FSAR commitments shall govern. Later revisions of applicable codes and standards may be invoked specifically by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an "equal or better than" original condition.

Appropriate design controls have been implemented to control modification work and associated design activities to assure that all modification work meets, or exceeds, original design requirements.

B.5.19.12. ANSI N45.2.12-1974-Draft 3, Rev. 4, February 1974 Requirements for Auditing of Quality Assurance Programs for Nuclear Plants

(a) Scope and Applicability

Except as expressly modified below, the guidance provided by this standard shall be applied to the audit program identified by the Operational QA Program for Fort St. Vrain Unit No. 1.