



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

Docket

May 4, 1988

Docket No.: 50-267
EA NO. (88-69)

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 RADIOACTIVITY EFFLUENT MONITORS (TAC NO. 66505)

The staff has completed its review of the Public Service Company of Colorado's submittal dated October 1, 1987 requesting changes in Technical Specifications (TS) regarding monitoring of radioactive effluents. This review also considered supplemental information that was submitted in a letter dated February 15, 1988.

The proposed amendment would: (1) allow you to use additional monitors to fulfill TS requirements for monitoring particulates, halogens, and noble gases; (2) require under some circumstances that you repair inoperable monitors within 7 days, rather than 30 days; (3) clarify when a gamma spectral analysis will be performed on samples taken from the gas waste tank; and (4) correct an error in Environmental Surveillance Requirement 8.1.2.

The enclosed draft input to the Safety Evaluation Report concludes that Item 1 is unacceptable for the reasons noted in the report. Items 2, 3 and 4 meet the applicable regulatory guidance and requirements and are therefore acceptable.

The deficiencies of your proposal have been discussed with Mr. M. Holmes of your staff. The staff can reconsider your proposals if the following requirements are included.

- A requirement to check the additional particulate and halogen monitors (RT-4801 and 4802) every four hours, when these are the only operable monitors.
- A requirement to check the additional noble gas monitor (RT-4803) every four hours, when it is the only operable monitor. Also, the additional noble gas monitor could only be utilized in this mode for a 30 day period.

Please provide your response to this draft Safety Evaluation input within 60 days of the date of this letter.

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R. O. Williams, Jr.

- 2 -

The information requested in this letter affects fewer than 10 respondents; therefore OMB clearance is not required under P.L. 96-511.

Sincerely,

15/

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

cc: E. Branagan
D. Lynch

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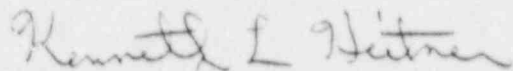
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R. O. Williams, Jr.

- 2 -

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Sincerely,



Kenneth L. Heitner, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
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RADIATION PROTECTION BRANCH'S INPUT TO SAFETY EVALUATION REGARDING
FORT ST. VRAIN RADIOACTIVE EFFLUENT MONITORS
DOCKET NO. 50-267

1.0 INTRODUCTION

By letter dated October 1, 1987, Public Service Company of Colorado, the licensee for Fort St. Vrain Nuclear Generating Station, requested a license amendment to revise their Technical Specifications (TS) (Ref. 1). In response to an NRC staff request, supplemental information was submitted in a letter dated February 15, 1988 (Ref. 2). The amendment concerns the monitoring of radioactive effluents at Fort St. Vrain.

The proposed amendment would: (1) allow the licensee to use additional monitors (RT-4801, RT-4802, and RT-4803) to fulfill the TS requirements for monitoring particulates, halogens, and noble gases, respectively; (2) require the licensee under some circumstances to repair inoperable monitors within 7 days, rather than 30 days; (3) clarify when a gamma spectral analysis will be performed on samples taken from the gas waste tank; and (4) correct an error in Environmental Surveillance Requirement (ESR) 8.1.2, note 4 (page 8.1-24).

2.0 EVALUATION

Item 1 - Additional Monitors

Environmental Limiting Condition of Operation (ELCO) 8.1.1.g.2 (page 8.1-3) currently requires that if the halogen or the particulate monitor becomes inoperable, gaseous effluents may continue to be released from the reactor building ventilation system provided that the effluent is continuously monitored with auxiliary sampling equipment. The licensee has proposed amending this ELCO to state that the monitor referenced in the ELCO is "the required monitor," and that if "the required monitor" is not available, then samples shall be obtained at least once per seven days and analyzed within 24 hours. The effect of this change (and a corresponding change to ESR 8.1.1, note, page 8.1-9) would be to allow the licensee to indefinitely use monitors (RT-4801 and 4802) that would alarm at a "local" location, rather than alarm in the control room, as the required monitors (see Attachment 1 of Ref. 2). The monitors that presently serve this function are required to alarm in the control room.

The staff finds the proposed change unacceptable because if the additional monitors (RT-4801 and 4802) failed to operate, the failure would not be known until someone checked the local alarm location. The licensee notes that this area is currently checked every four hours (Ref. 1, Attachment 4, page 3); however, the TSs do not require this surveillance.

ELCO 8.1.1.g.3 (page 8.1-4) currently requires that if both noble gas monitors become inoperable, gaseous effluents may continue to be released from the reactor building ventilation system provided that grab samples are taken at least once per eight hours and analyzed within 24 hours. The licensee has proposed amending the ELCO (and also ELCO 8.1.1.g.4) to state that the monitor referenced in the ELCO is "the required monitor." The effect of this change

(and a corresponding change to ESR 8.1.1, note, page 8.1-9) is similar to the effect for the halogen and particulate monitors. The change would allow the licensee to indefinitely use a monitor (RT-4803) with a "local" alarm, rather than an alarm in the control room, as one of the required monitors (see Attachment 1 of Ref. 2). In contrast to the two existing monitors (RT-7324-1 and 2), the added monitor is not capable of terminating releases from the reactor building vent.

The staff finds the proposed change unacceptable for the reasons noted in regard to the halogen and particulate monitors, and also because the added monitor does not have the capability to terminate releases.

Item 2 - Inoperable Monitors

ELCO 8.1.1.g.8 (page 8.1-6) currently requires that if one or more of the gaseous effluent monitors are inoperable, "best efforts shall be exerted to return the instruments to operable status within thirty days, and if unsuccessful," provide an explanation in the next Semi-Annual Effluent Report. The licensee has proposed amending the TS to exert "best efforts" to return the instruments to operable status within seven days and if unsuccessful, to submit a special report within 14 days. The staff finds the proposed change acceptable.

Item 3 - Gamma Spectral Analysis

The licensee proposes to change ESR 8.1.1.1.d (page 8.1-10) to clarify when a gamma spectral analysis shall be performed on samples taken from the gas waste tank. The licensee proposes to analyze the samples within 48 hours. The staff finds this change acceptable since it is consistent with the standard technical specifications.

Item 4 - Correction

The licensee proposes to delete ESR 8.1.2.d.4 (page 8.1-24) since it is not applicable to the instrument controls at Fort St. Vrain. The staff finds this change acceptable.

3.0 CONCLUSIONS

The staff has reviewed Public Service Company of Colorado's proposed amendment regarding the monitoring of radioactive effluents at Fort St. Vrain. The staff finds Item 1 unacceptable for the reasons noted in the report.

The staff finds that Items 2, 3 and 4 meet the applicable regulatory guidance and requirements and are therefore acceptable.

Principal Contributor: Edward F. Branagan, Jr.

4.0 REFERENCES

1. Letter from R. O. Williams, Jr., Public Service Company of Colorado, to Nuclear Regulatory Commission, dated October 1, 1987.
2. Letter from R. O. Williams, Jr., Public Service Company of Colorado, to Nuclear Regulatory Commission, dated February 15, 1988.