



Public Service™

June 23, 1988
Fort St. Vrain
Unit No. 1
P-88212

Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

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

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: Additional Information
on Proposed Changes to
Section 7 of the FSV
Technical Specifications

REFERENCES: 1) PSC Letter, Williams
to Calvo, dated
2/5/88 (P-88053)

2) NRC Letter, Heitner
to Williams, dated
5/24/88 (G-88183)

Dear Mr. Calvo:

This letter provides additional information as requested in Reference 2 and concerns PSC's submittal (Reference 1) of the proposed changes to Section 7, Administrative Controls, of the FSV Technical Specifications.

NRC Comment #7

Figure 7.1-2 Fort St. Vrain Conduct of Operations Chart

FSV has eliminated the position of (1) Superintendent of Training, (2) Results I&C Supervisors, (3) Shift Supervisor Training, and (4) Superintendent Scheduling Planning and Stores.

We find the elimination of the positions of Superintendent of Training and Shift Supervisor Training acceptable as the training function is now under the new position of Nuclear Training Manager (see 1. above). We find the elimination of the position of Superintendent Scheduling Planning and Stores acceptable as we do not require that function to be a part of Figure 7.1-2. We find the elimination of the Results I&C Supervisors not acceptable without a description as to how that function will be accomplished.

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PSC Response

The Results I&C Supervisor position will continue in the actual FSV Nuclear Production Division Organization. The functions that would have been accomplished as a PORC Member are being fulfilled by the Superintendent of Nuclear Betterment Engineering and/or the Results Engineering Supervisor, both of whom are on the PORC Membership list and meet the requirements of ANSI 18.1, 1971.

The proposed changes (Reference 1) would be in accordance with planned PORC Membership reduction for the sake of enhanced continuity and as requested in NRC Letter, Heitner to Williams, dated 12/5/86.

NRC Comments #9, 10

Section 7.4.b. - Procedures

FSV has revised the provisions for review and approval of procedures to allow their review by a PORC subcommittee and subsequent approval by appropriate management prior to implementation.

We find this requested change unacceptable unless the Safety Evaluation for the change to the procedures are reviewed by the PORC and the procedures are approved by a manager predesignated in writing by the Station Manager.

Section 7.4.c. - Temporary Changes to Procedures

FSV has revised the provisions for the review and approval of temporary changes to procedures to allow the changes to be reviewed by a subcommittee of the PORC and subsequent approval by the appropriate management.

We find the requested change unacceptable unless the Safety Evaluation for the change to the procedures is reviewed by the PORC and approved by a Manager predesignated in writing by the Station Manager.

PSC Response

The approval of procedures and approval of changes to procedures will not be changed by this amendment proposal. The purpose of the subcommittees is to perform preliminary reviews and make recommendations to PORC prior to the procedures going to PORC. This will allow PORC to concentrate on the safety issues involved with the procedure change, if any. All procedures referenced in the Technical Specifications AC 7.4.b and AC 7.4.c will continue to be reviewed by PORC and approved in accordance with Administrative Procedure G-2, FSV Procedure Systems, and Technical Specification AC 7.1.2.5.a.

PSC considers that the subject areas in question will require further discussion with the NRC, including clarification of the extent to which Safety Evaluations are performed for procedure changes. In many cases, procedures being revised are not described in the FSAR and do not involve safety concerns and, therefore, do not require a

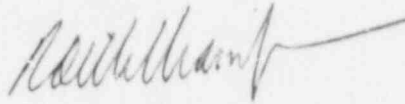
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Safety Evaluation to be performed. It is possible that a revised Technical Specification amendment request may be necessary.

PSC has recently undergone a reorganization, therefore further changes to Section 7 will be required. Among the changes will be a proposal to eliminate the organization charts (NRC Generic Letter 88-06) from the Technical Specifications and incorporate them in the FSAR, which is updated annually. Until such time as a new amendment proposal can be processed, PSC intends to pursue NRC approval of the existing amendment request.

If you have any questions regarding this information, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,



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

ROW/DLF/lmb

cc: Regional Administrator, Region IV
ATTN: Mr. T. F. Westerman, Chief
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Mr. Robert Farrell
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