

August 4, 1997

Public Service Company of Colorado
ATTN: Mr. M. H. Holmes
550 15th Street, Suite 700
Denver, Colorado 80202-4256

Dear Mr. Holmes:

This letter refers to your application dated July 15, 1997, requesting an amendment to your Quality Assurance Program Approval No. 0346, Revision 7.

The quality assurance program provided in your application is written in terms mainly to address independent spent fuel storage installation activities and is broader in scope than is required for your current transportation activities. Therefore, the quality assurance program provided is not clear as to its applicability to transportation activities. To clarify the applicability of your program to transportation activities, please address the issues identified in the enclosure. This information should be provided within 45 days from the date of this letter. If you have any questions regarding this matter, you may contact Mr. James Spets of my staff at (301) 415-8553.

Sincerely,

Original /s/ by

John P. Jankovich, Section Chief
Transportation and Storage Inspection Section
Spent Fuel Project Office, NMSS

Docket No. 0710346

Enclosure:
As stated

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**Comments to Public Service Company of Colorado's (PSCo's)
Proposed Revision to Quality Assurance Program (QAP) Approval
for Radioactive Material Packages Number 0346**

1. Clearly define what portions of the QAP are applicable to transportation.
2. Clearly define which positions/personnel are involved in transportation activities and what their responsibilities are (e.g., Corporate Executive, ISFSI Manager, QA Manager, Engineering Manager, etc.).
3. Define how PSCo will ensure that only the NRC approved QAP for transportation, with the applicable SAR revision, will be utilized.
4. Modify organization charts to show relationships between personnel/positions involved in transportation activities.
5. In Section 11.3.1.1, "Quality Program Levels" clarify what is meant by "or the "Important to Safety" provisions of shipment requiring the use of the NRC approved packages in accordance with 10 CFR Subpart H." It should be noted that NUREG/CR-6407, INEL-95/0551, "Classification of Transportation Packaging and Dry Spent Fuel Storage Systems Components According to Important to Safety" provides guidance on component classification.
6. Revise Section 11.3.1.5, "Regulatory Commitments" to address 10 CFR 21 applicability to 10 CFR 71 activities.
7. Define if Section 1.5, as referenced in Section 11.3.1.5, is applicable to transportation activities.
8. Define if Appendix A11-2, as referenced in Section 11.3.1.5, is applicable to transportation activities.
9. Section 11.3.1.5 only addresses 10 CFR 71 Subpart H. Address other applicable section of 10 CFR 71.
10. First sentence of Section 11.3.2.1, "Performance" is confusing and needs to be rewritten.
11. Clarify that Section 11.3.2.1, "Reviews" is also applicable to transportation activities and certificate of compliance requirements.
12. Define in Section 11.3.2.4, "Procurement Control" that procurement documentation must designate pertinent documentation to be furnished with packaging (e.g., certificates of compliance, as-built drawings, photographs, sketches, use and maintenance manuals, etc.).

13. In Section 11.3.2.6, "Identification and Control of Items" address the control of limited-life items.
14. In Section 11.3.2.7, "Handling, Storage, and Shipping" address NRC, DOT, and certificate of compliance requirements and protective environments.
15. In Section 11.3.2.8, "Test Control" address suitable environmental conditions for testing and documentation and evaluation of test results.
16. In Section 11.3.2.15, "Records" address record retention requirements of 10 CFR § 71.91 (a), 10 CFR § 71.91 (c), and 10 CFR § 71.135.
17. Apply comment 2. to Section IX, "Conduct of Operations."