



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

February 10, 1981

Mr. William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: APPLICATION OF NRC ACTION PLAN TO FORT ST. VRAIN NUCLEAR
GENERATING STATION

Dear Mr. Dircks:

The ACRS Subcommittee on the Fort St. Vrain Nuclear Generating Station met on January 27, 1981 with representatives of the Licensee, Public Service Company of Colorado, and with members of the NRC Staff.

At this meeting we discussed the implications of the TMI-2 accident in relation to the Fort St. Vrain plant which, as you know, is a high-temperature gas-cooled reactor (HTGR), not a light-water-cooled reactor (LWR).

It became apparent during this meeting that many items of the NRC Action Plan and related NRC Staff positions developed from the TMI accident are being applied to the Fort St. Vrain plant without appropriate consideration being given to certain basic differences between HTGRs and LWRs. This procedure does not constitute good regulatory policy, nor does it necessarily lead to appropriate improvements in safety for Fort St. Vrain or to confidence in the regulatory process.

Many of the Action Plan items are not applicable to Fort St. Vrain. Examples include reactor water level measurements, high point reactor vents, PORV related items, and subcooling meters. The NRC Staff has recognized some of these differences.

At the same time it is clear that many of the Action Plan items apply directly in whole or in part to Fort St. Vrain. But there are many items that lie between these positions. In addition to the major differences in HTGR and LWR technology, there are significant differences in response times required to deal with both operating transients and postulated accidents. There are also differences in fission product inventories in the coolant and in potential radiological releases.