



# Public Service Company of Colorado

16805 Road 19 1/2, Platteville, Colorado 80651

October 25, 1979  
Fort St. Vrain  
Unit No. 1  
P-79247

Mr. George Kuzmycz, Project Manager  
U. S. Nuclear Regulatory Commission  
Division Project Management  
Special Projects  
Washington, D. C. 20555

Docket No. 50-267

Subject: Plateout Probe

Reference: (1) P-79028  
(2) P-79040

Dear Mr. Kuzmycz:

In Reference (1) we requested relief from SR 5.2.6 of the Fort St. Vrain Technical Specifications which involved removal and analysis of plateout probe. At that time we indicated that we would fulfill the requirement of SR 5.2.6 during the next scheduled outage.

We had planned to remove the plateout probe during our scheduled outage of October 20 through November 30 of this year. As you are aware, we experienced a forced plant shutdown on October 14, 1979, and we were not able to return to any significant power levels until October 23, 1979, and we are scheduled to shutdown on October 25, 1979, in preparation for installation of the region constraint devices. With the extended shutdown of nine days, the plateout probe has decayed sufficiently that it would require about two weeks of operation at power levels in excess of 50% to reactivate the probe to permit a meaningful analysis. In this respect, we find ourselves in a position similar to that experienced last February and are requesting relief from SR 5.2.6.

We believe that delaying the plateout probe removal at this time will have no significant impact on the health and safety of the public based on the following:

1. The plateout probe analyses is utilized to determine compliance with LCO 4.2.8 for comparison of calculated estimates of  $^{90}\text{Sr}$  and the degree of conservatism for  $^{131}\text{I}$  plateout assumptions.

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2. At the present time, based on primary coolant analyses we are considerably lower than predicted on the circulatory activities as follows:

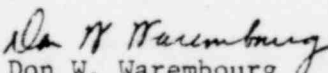
Total Circulating Activity	0.027 Ci Mev/16
Tech. Spec. Allowable (LCO 4.2.8)	2.4 Ci Mev/16
Circulating Iodine Inventory	0.374 Ci $^{131}\text{I}$
Tech. Spec. Allowable	24.0 Ci $^{131}\text{I}$
Circulating Strontium Inventory	.33 Ci $^{90}\text{Sr}$
Tech. Spec. Allowable	7.0 Ci $^{90}\text{Sr}$
Iodine Plateout (calculated)	187 Ci $^{131}\text{I}$
Tech. Spec. Allowable	5000 Ci $^{131}\text{I}$ /loop

Activity of Noble Gases are a factor of 2 to 4 less than predicted and factors of 20 to 40 less than the design bases used for accident analyses.

With the conservatism represented by the above comparisons, delaying the analyses of the plateout probe at this time will not have any effect on the design accident analysis or our ability to meet the requirements of LCO 4.2.8. We will reschedule the removal of the plateout probe for the next scheduled refueling.

Your immediate attention to this matter will be appreciated.

Very truly yours,

  
Don W. Warembourg  
Manager Nuclear Production

DWW:dkm

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