



Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

September 3, 1982
Fort St. Vrain
Unit No. 1
P-82370

Mr. George Kuzmycz
Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20034

REFERENCE: Telephone Conversation of 9-3-82

Dear Mr. Kuzmycz:

A conservative analysis performed by General Atomic Company on the effects of reserve shutdown material being present in Region 27 indicates that a potential may exist for operating in a mode outside the limits specified in LCO 4.1.3. Due to the flux tilt created by the suspected presence of reserve shutdown material in Region 27, the calculated reactivity worth of the control rod pair in Region 11 may exceed the maximum allowable worth as determined conservatively by interpolation between the end of cycle values given in Figure 5.5 of the Safety Analysis Report For Fuel Reload 1 Extended Operation and those given in Figure 5-5 of the Safety Analysis Report For Fuel Reload 2 (Cycle 3).

In view of the information above, General Atomic Company has provided to Public Service Company the attached plot which indicates the conditions under which the potential reactivity insertion due to the withdrawal of the control rod pair in Region 11 may exceed that analyzed in the Design Base Rod Withdrawal Accident. Public Service Company intends to operate in accordance with this plot until such time as reserve shutdown material is not present in Region 27 or until a future analysis reveals another acceptable operating strategy. In addition, Public Service Company will review its operating history to determine whether past conditions could have allowed the potential for a reactivity insertion greater than that analyzed in the Design Base Rod Withdrawal Accident to exist.

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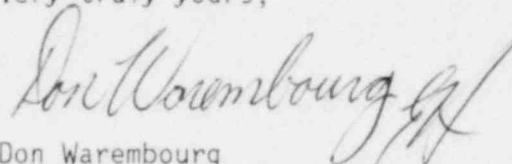
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Of course, any deviation from the forementioned approach will be reported promptly in accordance with the Fort Saint Vrain Technical Specifications.

If you have any questions, please contact me.

Very truly yours,

A handwritten signature in cursive script, reading "Don Warembourg". The signature is written in dark ink and includes a stylized flourish at the end.

Don Warembourg
Manager, Nuclear Production

DW/lrb

Enclosure

