



Public Service

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Company of Colorado**
P.O. Box 840
Denver CO 80201-0840

April 18, 1990
Fort St. Vrain
Unit No. 1
P-90111

A. Clegg Crawford
Vice President
Nuclear Operations

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Docket No. 50-267

SUBJECT: Request for Additional Information on
Exercise Weakness 267/8922-01

- REFERENCES: (1) NRC Letter, Collins to Crawford, dated 12/18/89
(G-89410)
- (2) PSC Letter, Crawford to Doc. Control Desk, dated
1/19/90 (P-90011)
- (3) NRC Letter, Collins to Crawford, dated 3/16/90
(G-90036)

Dear Sirs:

This letter is in response to your request for additional information made in reference 3, regarding Exercise Weakness 267/8922-01.

(1) NRC Comment:

Early in the accident scenario the senior reactor operator, or as you have designated him, the Directing Reactor Operator, appeared to be occupied with filling out notification forms and making notification calls. Your response states that these activities in no way interfered with the proper evaluation, analysis, and control of the reactor. Our point was not this individual's interference with plant evaluation, but whether he should have, in fact, been participating in plant evaluation.

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PSC Response:

NRC Information Notice No. 87-58 states "Licensees have a responsibility to provide enough on-shift personnel knowledgeable about plant operations and emergency plan implementation to enable timely, accurate, and reliable reporting of operating events without interfering with plant operations." In compliance with the aforementioned notice, during power operations at Fort St. Vrain (FSV), the Control Room has typically been staffed with three licensed reactor operators (not including the Shift Supervisor), two of whom have been assigned to plant evaluation, analysis and control. The third, the DRO, maintained the administrative functions associated with Control Room activities. Maintaining three licensed operators in the Control Room is in excess of the staffing requirements as identified in the FSV Technical Specifications. The primary duty of the DRO during emergency conditions is to perform required emergency notifications as designated by the Shift Supervisor. Actions taken by the DRO during the accident scenario were appropriate and the two other licensed operators provided adequate resources for evaluation, analysis and control of the reactor.

Past NRC inspectors have found PSC's use of the DRO position for performing emergency notifications to be an acceptable practice. During inspection 87-30, conducted by Mr. C. A. Hackney during the period of November 2-6, 1987, one of the areas of inspection included notifications and communications. The licensee notification process was found to be adequate and acceptable with no violations, deviations or findings identified. Also, during inspection 88-22, conducted by Mr. N. M. Terc, during the period of November 15-17, 1988, one of the program areas inspected included notifications of offsite agencies. Again, no violations, deviations or findings concerning this particular area were identified.

(2) NRC Comment:

It was our observation that during this period (8:08 a.m.), the Shift Supervisor was involved in briefing the arriving Operations Manager. The Operations Manager assumed the Emergency Coordinator's position at 8:15 a.m. Therefore, we believe your reference to the abundance of senior reactor operators present in the control room had no impact on the period in question in terms of plant evaluation, analysis, and control.

PSC Response:

As noted by the NRC in Reference 3, during the time Exercise Weakness 267/8922-01 allegedly occurred, the Operations Manager and the Shift Supervisor were involved with a briefing and turnover of the Emergency Coordinator function. Neither of these management individuals believed sufficient operational activities were occurring which should preclude the turnover from taking place. Further, there were two licensed operators available that had no auxiliary functions other than plant evaluation, analysis and control. Had conditions changed, mitigation of emergency conditions would have taken priority over the turnover process.

(3) NRC Comment:

In consideration of the Fort St. Vrain operating license requirements, the present condition of your facility (defueling/decommissioning) cannot mitigate any weaknesses or concerns identified in the area of emergency preparedness until plan revisions are reviewed and approved by the NRC staff.

PSC Response:

PSC recognizes that the present condition of Fort St. Vrain has no bearing on the area of emergency preparedness until plan revisions have been made and approved by the NRC staff. As stated in our letter, P-89421, dated October 24, 1989, PSC fully intends to support the emergency preparedness plan.

Based on the above, PSC considers that necessary evaluations, analyses, and control of emergency actions were fully supported by licensed operators. Therefore, no additional controls nor corrective actions are planned.

If you have any questions or comments associated with this response, please contact Mr. M. H. Holmes at (303) 480-6960.

Sincerely,



A. C. Crawford
Vice President
Nuclear Operations

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ACC/rm

cc: Regional Administrator, Region IV
ATTN: Mr. J. B. Baird
Technical Assistant
Division of Reactor Projects
(2 copies)

Mr. R. E. Farrell
Senior Resident Inspector
Fort St. Vrain

Mr. Rick Hatten, Director
Division of Disaster Emergency Services
State of Colorado