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Public Service
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March 15, 1993
Fort St. Vrain
Unit No. 1
P-93021

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

ATTN: John H. Austin, Chief
Decommissioning and
Regulatory Issues Branch

Docket No. 50-267

SUBJECT: 10 CFR 20 Exemption Request - Supplemental Information

REFERENCE: PSC Letter, Crawford to Taylor, dated November 25, 1992
(P-92309)

Dear Mr. Austin:

This letter provides additional information in support of Public Service Company of Colorado's (PSC's) referenced request for an exemption from the revised radiation protection standards in 10 CFR 20.1001 through 20.2401. During a recent telephone conversation, Mr. Clayton L. Pittiglio, the NRC's Project Manager, requested that PSC provide clarification of the following:

- Administrative limit for doses to pregnant females
- Annual administrative limit for doses to workers
- Compatibility of Fort St. Vrain dose records with other nuclear facilities

The administrative limits for all activities at Fort St. Vrain are specified in Scientific Ecology Group (SEG) procedure FSV-RP-DOS-A-100, "Fort St. Vrain Decommissioning Project External and Internal Dosimetry Program," a copy of which is available in the NRC Resident Inspector's office at Fort St. Vrain. SEG issues Radiation Protection procedures for the entire Fort St. Vrain decommissioning project, with PSC approval. Section 5.2 of FSV-RP-DOS-A-100 provides administrative whole body dose limits of 500 mrem per term for declared pregnant females and 4.5 Rem per year for any individual. As also discussed in the referenced letter, these limits and the rest of the FSV Radiation Protection Program administratively restrict worker doses at Fort St. Vrain within the limits of the revised 10 CFR 20 standards.

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As also discussed in the referenced letter, PSC proposes to continue tracking and recording worker exposures in terms of whole body doses, as opposed to the Total Effective Dose Equivalents (TEDEs) introduced by the revised 10 CFR 20 requirements. The TEDE normally includes both external (whole body) and internal doses. The NRC questioned how other nuclear facilities in the future would be able to assign dose allowances for workers who previously received doses from the Fort St. Vrain decommissioning project, since Fort St. Vrain doses would be whole body doses and the dose allowances at other nuclear facilities would be in TEDEs.

PSC expects that the whole body doses recorded for workers at Fort St. Vrain will typically be numerically the same as TEDEs. Internal doses during Fort St. Vrain decommissioning are expected to be low enough that they would not have to be included in a TEDE determination, per 10 CFR 20.1202, even if a TEDE determination were performed. PSC will continue to provide workers with exposure history reports that identify the external doses received and internal radionuclide intakes in terms of % Maximum Permissible Body Burden. For the large majority of workers, which are expected to have negligible internal intakes, other nuclear facilities will be able to assign a TEDE dose allowance based on their external dose. For any individual with an internal intake that is not negligible, an associated dose will be estimated.

PSC trusts that this information is responsive to your questions and we request that the NRC approve an exemption from the revised requirements of 10 CFR 20 for the Fort St. Vrain decommissioning project. If you have any questions regarding this submittal, please contact Mr. M. H. Holmes at (303) 620-1701.

Sincerely,


Don W. Warembourg
Decommissioning Program Director

DWW/SWC

cc: Regional Administrator, Region IV

Mr. Ramon E. Hall, Director
Uranium Recovery Field Office

Mr. Robert M. Quillin, Director
Radiation Control Division
Colorado Department of Health