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Public Service
Company of Colorado
P O BOX 840
DENVER CO 80201-0840

A. Clegg Crawford
Vice President
Electric Production

May 7, 1993
Fort St. Vrain
Unit No. 1
P-93045

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

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

Docket No. 50-267

SUBJECT: **Proposed Amendment to Decommissioning Technical Specifications**

Dear Mr. Austin:

This letter submits Public Service Company of Colorado's (PSC's) proposed change to Design Feature 4.3 of the Fort St. Vrain (FSV) Decommissioning Technical Specifications (DTS), to facilitate removal of core outlet coolant thermocouple assemblies. Design Feature 4.3 currently requires that penetrations in Fort St. Vrain's Prestressed Concrete Reactor Vessel (PCRV) be sealed by welding or by installing blind flanges, to protect against leakage of shield water.

There are seven PCRV penetrations that provide access to core outlet coolant thermocouple assemblies. PSC originally intended to remove the thermocouple assemblies through these penetrations and then install blind flanges, before shielding water was introduced into the PCRV. However, radiation levels from the thermocouple assemblies were too high for removal through the penetrations, and it was decided to remove them underwater.

The underwater thermocouple removal method chosen by PSC's decommissioning contractor is described and illustrated in the attached No Significant Hazards Consideration Evaluation (Attachment 3). In general, the thermocouple assemblies will be pushed into the PCRV cavity, by use of a push-rod assembly through the penetration. Inside the PCRV cavity, the thermocouple assemblies can be handled underwater with long-handled tools. During use of the push-rod assembly, the penetration blind flanges must be removed, and this requires a revision to Design Feature 4.3.

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PSC proposes to revise the requirements of Design Feature 4.3 to allow the core outlet coolant thermocouple penetration blind flanges to be removed, one at a time, during underwater removal of the thermocouple assemblies. While blind flanges are removed, shield water leakage will be prevented by redundant shaft seals on the push-rod assemblies. Blind flanges will be installed before and after the thermocouple assembly removal process, which is expected to be completed within eight hours per penetration.

PSC's proposed change to Design Feature 4.3 is described in the following attachments:

Attachment 1 - Summary of Proposed Change
Attachment 2 - Proposed Change
Attachment 3 - No Significant Hazards Consideration Evaluation

PSC has determined that the proposed change to Design Feature 4.3 involves No Significant Hazards Consideration, as described in 10 CFR 50.92. Further, PSC considers that the consequences of postulated PCRV shield water leakage during use of push-rods are substantially less than the worker doses that would result from removal of the 200 R/hr thermocouples externally through the PCRV penetrations. Approval of this proposed DTS amendment is consistent with PSC's efforts to keep worker radiation exposures as low as is reasonably achievable.

PSC requests NRC approval of the attached proposed Decommissioning Technical Specification amendment as soon as is reasonably possible, to support thermocouple removal activities that are currently planned for the third quarter of 1993.

If you have any questions concerning this submittal, please contact Mr. M. H. Holmes at (303) 620-1701.

Very truly yours,

A. Clegg Crawford

A. Clegg Crawford
Vice President
Electric Production

ACC/SWC

Attachments

cc: w/attachment

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