

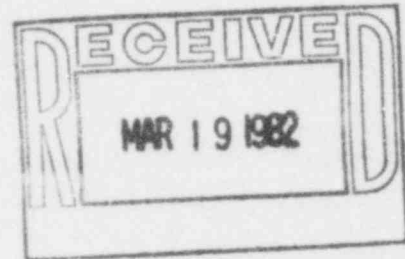
PUBLIC SERVICE COMPANY OF COLORADO

P. O. BOX 840 • DENVER, COLORADO 80201

OSCAR R. LEE
VICE PRESIDENT

March 11, 1982
Fort St. Vrain
Unit No. 1
P-82071

Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Dr., Suite 1000
Arlington, TX 76011



SUBJECT: I & E Inspection Report 81-28

REFERENCE: NRC Letter Dated February 17, 1982
(G-82051)

Dear Mr. Collins:

This letter is in response to the Notice of Violation received as a result of the inspection conducted by Messrs. B. Murray and W. L. Holley of your staff on December 7-11, 1981. The following response to the item contained in the Notice of Violation is hereby submitted:

1. Technical Specification LCO 4.8.1(c) states in part:

"Plant equipment in the helium purification system (. . . including the titanium sponge), . . . shall be utilized to keep releases of radioactive materials to unrestricted areas as low as practicable. . ."

Contrary to the above, the titanium sponge in the helium purification system has not been in operation since April, 1980.

This is a Severity Level V Violation (Supplement I).

- (1) The corrective steps which have been taken and the results achieved:

Titanium sponge has been placed in the helium purification system and is available for use upon activation of the system. The system is currently not in use, as the PCRV is depressurized. This places us in compliance with LCO 4.8.1(c).

- (2) The corrective steps which will be taken to avoid further violations:

This Technical Specification will be evaluated to determine the need for having operable titanium sponge in the helium purification system. Based on a review of effluent discharges from Fort St. Vrain in the 20 months between April 1980 and January 1982, approximately 370 curies of tritium were released via the liquid waste discharge path, while approximately 14 curies were released via the gas waste discharge path. In the 20 months preceeding April 1980, approximately 4 curies of tritium were released via the gas waste discharge path, while the titanium sponge was in service. The electrical generation of the plant for the above two time periods was approximately 1,300,000 MWH (net) and 565,000 MWH (net), respectively.

From the above information it can be seen that:

- a.) Tritium in the primary coolant is being removed in the liquid form prior to reaching the titanium sponge; and
- b.) The curies of gaseous tritium, released per net MWH for periods when the titanium sponge was in service and was out of service are essentially the same.

Based on the above preliminary evaluation, we feel that the presence or absence of the titanium sponge has little effect on gaseous tritium release, and we seriously question the need for the present Technical Specification. We will in all probability, be requesting a change to this Technical Specification in the immediate future.

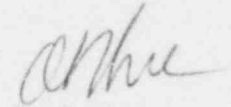
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(3) The date when full compliance will be achieved:

Full compliance was achieved when the titanium sponge was returned to service on March 10, 1982.

Should you have any further questions, please contact Mr. Edwin D. Hill, (303) 571-7436, Ext. 218.

Very truly yours,

A handwritten signature in cursive script, appearing to read "OR Lee".

O. R. Lee
Vice President

ORL/skd

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Public Service Company of Colorado
Fort St. Vrain Unit No. 1

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Docket No. 50-267

AFFIDAVIT

... being duly sworn, hereby deposes and says that he is Vice President of Electrical Production of Public Service Company of Colorado; that he is duly authorized to sign the file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Report 81-28; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



O. R. Lee
Vice President of Electrical Production

STATE OF Colorado)
COUNTY OF Weld) ss

Subscribed and sworn to before me, a Notary Public in and for the State of Colorado
on this 11th day of March, 1982.

Audrey L. Kitzman
Notary Public

My commission expires 11-29, 1983