



Public Service Company of Colorado

SD-267

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June 1, 1982
Fort St. Vrain
Unit #1
P-82172

Mr. Darrel G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Fort St. Vrain Unit No. 1
Post TMI-2 Requirements

REF: USNRC Generic Letter 82-10

Dear Mr. Eisenhut,

As requested by the above referenced letter please find attached our update of the applicable NUREG 0737 items.

You will note that many of the items are still under review by either ORNL or the NRC, and we cannot, therefore, provide you definitive implementation schedules until we receive some acceptance or guidance that may result from those reviews.

Items such as I.C.1, II.B.2.3, II.A.1.2, and III.D.3.4 are still under review by either ORNL or NRC. We have responded to set forth our programs regarding III.A.2.2 and based on preliminary review by ORNL and NRC comments during our last emergency exercise (August 1981) we believe we are proceeding with an appropriate program including the Class A model. We will be utilizing this system during our upcoming exercise. We do not at this time, however, have anything in writing from either ORNL or the NRC on the acceptance of programs we have submitted.

One of our major areas of concern is Item 1.A.1.3.2, Minimum Shift Crew. As indicated in the attachment our initial compliance is highly dependent on the results of recent NRC licensing exams. Continued compliance is highly dependent on personnel turn over and unforeseen absences until such time that we can provide training and obtain additional SRO and RO licenses. Given the unique situation of having the only HTGR and the regulatory requirement to advance from RO to SRO, it takes time to train and license an adequate number of personnel. As indicated in the attachment, pending successful results of the recent license candidates we will be able to meet the July 1, 1982 date, but most certainly the number of people we will have will not provide any cushion for unforeseen circumstances. We hope that you can factor our particular situation into your thinking on this item.

Very truly yours,



Don W. Warembourg
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

DWW/kac

cc:

B. Clark
G. Kuzmyz
B. Grimes
J.T. Collins (Region IV)

Fort Saint Vrain Unit No. 1

NUREG 0737 ITEMS SCHEDULED AFTER MARCH 1, 1982

P-82172

1.A.1.3.1 Overtime

In NRC's letter dated December 23, 1982 our position on overtime for operators was approved. We had issued an Operations Order in December 1980 which reflect the position approved by the NRC a year later. Subsequently we received NRC Generic Letter 82-02, and we reissued the Operations Order on March 22, 1982 to be consistent with the guidelines of the Generic Letter. We believe this item has been fully implemented.

1.A.1.3.2 Minimum Shift Crew

Our response of February 10, 1982 (See P-82038) remains unchanged. Obviously the requirement to have an extra SRO on shift will have a serious impact upon us. Pending the results of the recent license candidate exams we should have a staff to meet the minimum requirements, but we certainly will not have any cushion or reserve to accomodate unforeseen absences or personnel turnover. We are striving to provide additional SRO's, but with time restrictions between RO and SRO it will take us some time before we have a sufficient number of operators with an SRO license where we will be able to cope with sicknesses and unforeseen turnover or absences. Having the only HTGR complicates this staffing build-up. Pending reasonable success with recent license candidates we feel we can meet the July 1, 1982 date but we feel it is extremely important that you recognize the problems that may develop after July 1, 1982 which could place us in position where in we would be unable to comply with the minimum requirements.

1.C.1 Emergency Procedures

We have recently completed revisions to our emergency procedures. As indicated in NRC's letter of December 23, 1982, these revised procedures are under review by the NRC and ORNL. Our next refueling outage is scheduled for September/October 1983 and we are assuming that we will be in a position to evaluate NRC/ORNL comments, with the intent of providing a final revision to the procedures by this refueling in 1983.

1.D.1 Control Rooms Design

No reply required.

1.D.2 SPDS

No reply required.

II.B.1 RCS Vents

No reply required.

II.B.2.3 Plant Shielding

Presently under review by ORNL. Until review is completed we cannot address this item, nor any implementing schedules. Based on our submittals we believe we are in full compliance.

II.D.1.2 RV and SV Test Program

Not applicable to FSV.

II.D.1.3 Block Valves

Not applicable to FSV.

II.F.2 Instrumentation, Inadequate Core Cooling

No reply required, but this item has been closed for FSV per NRC letter of December 23, 1982.

II.K.30 & 31 SV LOCA Analysis

Our staff augmentation was forwarded in our letter P-81308, dated December 7, 1981. We were informed during the NRC Emergency Appraisal Audit in January 1982 that we could expect a response to our letter shortly. We are still awaiting this response, and we are therefore unable to address this matter further.

III.A.1.2 Upgrade Emergency Support Facilities

Our position on emergency support facilities was set forth in P-81178, dated June 30, 1981. This letter indicates an implementation date of May 1983. We have never received any comments from the NRC.

III.A.2.2 Meteorological Data

Our meteorological program was set forth in P-81070 dated February 26, 1981 with further clarification provided in P-81127 dated April 15, 1981. We now have the 10 and the 60 meter towers in service providing meteorological information to recorders at the towers. We are presently completing the telemetry work to tie the tower instrumentation to the Control Room. As indicated in our letter to ORNL (See P-81263 dated October 22, 1981) we have made every attempt to expedite completion of the 60 meter tower. We believe we will have the meteorological tower tied to our computers in the Control Room well before the October 1982 date.

III.D.3.A Control Habitability

Per NRC letter of December 23, 1981, most items appear to be acceptable. This matter is still under review by ORNL and we cannot address it further at this time.