



Public Service Company of Colorado

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December 13, 1982
Fort St. Vrain
Unit No. 1
P-82546

U. S. Nuclear Regulatory Commission
ATTN: Mr. Philip C. Wagner
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

- References:
- (1) G-82328, Note from Wagner to Warembourg, dated 10-28-82
 - (2) P-82391, Technical Specification submittal, dated 9-14-82.
 - (3) P-82112, Technical Specification submittal, dated 4-20-82
 - (4) G-82178, Generic Letter 82-12
 - (5) G-82357, Letter from Diggs to Lee, dated 11-17-82

Dear Mr. Wagner:

Attached for your review and comments are proposed revisions to Section 7.1 of the Fort St. Vrain Technical Specifications. Per our previous discussions, these proposed revisions incorporate the formal Technical Specification change submittals that have recently been made and the additions you suggested in your note to me dated October 28, 1982.

Since the attachment to this letter is a composite of many submittals, letters, and discussions, the following clarifications are provided.

1. The page numbering for Section 7.1 was changed to accommodate the proposed revisions.

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2. In Section 7.1.1 (2) UNIT STAFF, a new statement has been added to cross reference this section to the new Table 7.1-1 concerning the minimum shift crew composition. This statement was added in response to the recommendation you made via your note to me of October 28, 1982 (G-82328).
3. Section 7.1.1 (2)(i) is a new section that was added to address staff working hour guidelines. The text in this section is identical to that previously made in our formal submittal dated September 14, 1982 (P-82391).
4. Section 7.1.1 (3)(c) is a new section that was added to address the qualification and training requirements for the Technical Advisors. The text in this section is identical to that made in our formal submittal dated April 20, 1982 (P-82112). In your note dated October 28, 1982, you indicated that this change was acceptable, and would be included with other changes.
5. Section 7.1.2 (1) MEMBERSHIP is a revised section to reflect job title changes in the plant organization which affect PORC membership. The text in this section is identical to that previously made in our formal submittal dated September 14, 1982 (P-82391).
6. Section 7.1.3 (2) MEMBERSHIP is a revised section to reflect job title changes which affect the NESC membership. The text in this section is identical to that previously made in our formal submittal dated September 14, 1982 (P-82391).
7. A new Table 7.1-1 has been added to address the minimum shift crew composition, as recommended in your note to me dated October 28, 1982 (G-82328). Note that we have used applicability modes that are more appropriate for Fort St. Vrain operation than the temperature criteria suggested in your note. Refer to the discussion that follows.
8. Figure 7.1-2 has been revised to reflect the job title changes addressed in item 5 above. This figure is identical to that previously made in our submittal dated September 14, 1982 (P-82391).

Of the eight items listed above, the only one of consequence which you have not previously seen is the new Table 7.1-1. The criteria which we have used to determine applicability "modes" for Fort St. Vrain are based on the definitions that are presently in the Technical Specifications for Hot Shutdown, Cold Shutdown, and Refueling Shutdown conditions. Clearly, the modes used by PWR's and BWR's (Modes 1 through 6) are not appropriate for Fort St. Vrain since they are not defined for an HTGR. Additionally, establishing a temperature criteria to define the staff manning requirements is not appropriate; for example, the Technical Specifications define a Cold

Shutdown as having sufficient reactivity inserted to assure that a shutdown margin of at least $0.01 \Delta\rho$ would be achieved if the core temperature were 80°F , but that the actual core temperature is any temperature greater than or equal to 80°F . It is not unusual for the actual coolant temperature to be well above 220°F and for the reactor to be in a Cold Shutdown condition. Therefore, if the temperature criteria were used, we would be required to supplement our operational staff even though the reactor was in a Cold Shutdown condition.

A review of the various possible combinations of the Reactor Mode Switch ("Off," "Fuel Loading," and "Run" positions) and the Interlock Sequence Switch ("Startup," "Low Power," and "Power" positions) has shown that these switch positions, alone, are not sufficient to satisfy the intent of the proposed 10CFR50.54 change.

It is our position that the best criteria for the staff manning requirements should be keyed to the shutdown conditions currently defined in the Technical Specifications. This approach removes the ambiguity associated with a temperature criteria, and guarantees a specific reactor "mode" in combination with a minimum required shutdown margin. We request that you give this approach careful consideration for the proposed revision to 10CFR50.54 in general, and Fort St. Vrain in particular.

Due to the number of changes that have been submitted and/or requested to Section 7.1 in the recent past, it is apparent that a methodical approach should be taken with regards to license amendments concerning these subjects. I suggest that the NRC and PSC concentrate their efforts on reviewing the composite attachment to this letter and withhold all licensing actions on previous submittals to Section 7.1. Subsequent to this review, I will obtain the plant and corporate approvals necessary for a formal Technical Specification change submittal.

A fee of \$1,200 was deemed to be necessary for our previous submittal of September 14, 1982. A voucher for this amount has been obtained in response to a letter from the License Fee Management Branch (G-82357). However, since the fees associated with the changes to Section 7.1 in its entirety have not been established, I am withholding the \$1,200 payment until a final determination of the fee is made. The appropriate fee will then accompany our formal composite submittal.

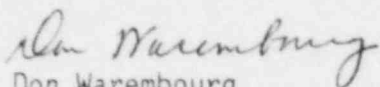
Please be aware that consistent with our NUREG-0737 commitments, the changes proposed by the attached Technical Specification are being administratively enforced at the present time. The Technical Specification, then, is merely a means of formalizing these commitments. In this respect, any delays experienced in finalizing the Technical Specification have no safety implications as far as plant operations or emergency response is concerned.

Mr. Philip Wagner

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If you have any questions, please give me a call on (303) 785-2223, extension 200.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Don Warembourg".

Don Warembourg
Manager, Nuclear Production

DW/clb

Attachment