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January 20, 1995  
Fort St. Vrain  
P-95011

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: Response to Comments Regarding the Final Survey Plan for  
Site Release**

**REFERENCES:**

1. NRC Letter, Pittiglio to Crawford, dated January 17, 1995  
(G-95005)
2. PSCo Letter, Fisher to Austin, dated January 11, 1995  
(P-95005)
3. PSCo Letter, Warembourg to Austin, dated September 21,  
1994 (P-94080)

Dear Mr. Austin:

Attached are Public Service Company of Colorado's (PSCo) responses to the NRC's comments from Reference 1, regarding the revised Fort St. Vrain Final Survey Plan for Site Release.

PSCo considers that the attached responses, combined with the responses provided in References 2 and 3, fully address the NRC's comments and are consistent with our recent discussions with Messrs. David Fauver and Clayton Pittiglio of your staff. Based on the clarifications and commitments provided herein and in References 2 and 3, PSCo requests approval of the revised Final Survey Plan.

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P-95011

January 20, 1995

Page 2

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

Sincerely,

Mary J. Fisher by *J. Berst*

Mary J. Fisher

Decommissioning Program Director

MJF/SWC

Attachment

cc: w/attachment

Regional Administrator, Region IV

Mr. Robert M. Quillin, Director

Radiation Control Division

Colorado Department of Public Health and Environment

**FORT ST. VRAIN NUCLEAR STATION**

**FINAL SURVEY PLAN FOR SITE RELEASE**

**RESPONSE TO NRC COMMENTS  
PROVIDED IN JANUARY 17, 1995 LETTER  
FROM C. L. PITTIGLIO**

**ATTACHMENT TO P-95011**

### **NRC Comment 1**

- 1) *Will direct measurements be taken at locations identified as elevated during the scan survey?*

Yes, if an area of elevated activity is identified during the scan of a survey unit, the location will be marked and fixed point measurements for removable and total activity will be collected at that location in addition to the prescribed set of systematic measurements for the survey unit.

*Will the results of these direct measurements be included in the calculations of the mean and standard deviation to determine compliance with unrestricted use criteria, and included in the final survey report?*

Yes, the results of these fixed point measurements will be included in the calculation of the mean and standard deviation for the survey unit to determine compliance with the unrestricted use criteria, assuming that the survey unit does not require remediation and/or reclassification. If the survey unit requires remediation or reclassification, the results of the initial fixed point measurements will be archived as characterization survey data and the survey unit, or newly-defined subunit, will be resurveyed.

The results of resurvey will be considered as the final survey of record and will be included in the calculation of the mean and standard deviation for the survey unit to determine compliance with the unrestricted use criteria. For instances where resurvey is performed, the final report will be annotated indicating that the initial data for a survey unit has either been replaced or supplemented with subsequent survey data.

### **NRC Comment 2**

- 2) *What characterization data, or survey data, will be used to support classification of survey units as affected, suspect and non-suspect, and unaffected areas?*

One or more of the following types of data is available and will be used to determine the initial classification of survey units; operational history, characterization data, operational surveys performed to support decommissioning, routine surveillances and turnover surveys (for affected survey units only).

### NRC Comment 3

3) *What criteria will be used to classify areas as affected/suspect, affected/non-suspect, and unaffected?*

A survey unit may be classified as belonging to one of three categories; unaffected, non-suspect affected, and suspect affected.

A survey unit may be initially classified as unaffected if there is little or no potential for the presence of licensed material based upon operational history, characterization data, and routine surveillances. The presence of licensed material (in excess of MDA), or previous remediation would preclude a survey unit from being classified as unaffected.

A survey unit consisting of walls above two meters and ceilings within an affected area may be initially classified as suspect or non-suspect. Based upon engineering judgement, and in consideration of operational history, characterization data, operational surveys performed in support of decommissioning, routine surveillances and turnover surveys, a survey unit may be classified as non-suspect if:

1. It is not expected that average removable or total activity within the survey unit will exceed the larger of: 25% of the unrestricted use criteria; or the MDA for the equipment used to perform the survey.
2. It is not expected that an individual measurement for removable or total activity within the survey unit will exceed the larger of: 50% of the unrestricted use criteria; or the MDA for the equipment used to perform the survey.

An affected survey unit will be classified as suspect if there is reason to believe that there ~~was~~ licensed material within the survey unit, unless it meets the criteria specified above for a non-suspect affected survey unit.

#### NRC Comment 4

- 4) *Please describe, in greater detail, the procedure for investigating survey results in unaffected areas that exceed 25% of the unrestricted use criteria and in affected/non-suspect areas that exceed 50%. In addition, describe what the investigation will entail, what additional samples will be collected, and when will areas be reclassified as affected areas?*

The purpose of performing the investigation surveys is to confirm the initial final survey measurement, and if verified to exceed action levels, to define the bounds of the elevated activity. Depending on the results of the investigation survey, the survey unit may require remediation and/or reclassification and resurvey. The investigation surveys will generally consist of a scan survey over 100% of the accessible surfaces and measurements for removable and total activity. Typically the investigation survey will include an area of at least nine square meters, centered around the point of interest.

Investigation surveys will be performed within an unaffected survey unit if an individual final survey measurement for removable or total surface activity indicates the presence of licensed material (in excess of MDA). If during the investigation survey, measurements for removable or total surface activity are verified to exceed 25% of the unrestricted use criteria, the survey unit will be reclassified.

The action levels to initiate investigation surveys within non-suspect affected survey units are individual final survey measurements for removable or total surface activity in excess of 50% of the unrestricted use criteria. If greater than 10% of the initial final survey measurements within a non-suspect affected survey unit are verified to exceed this action level, or if an individual measurement exceeds the guideline values, then the survey unit will be reclassified as suspect affected and resurveyed. Conversely, if less than or equal to 10% of the initial final survey measurements within a non-suspect affected survey unit are verified to exceed this action level, and none of the individual measurements exceed the guideline values, then an investigation survey and/or reclassification will be performed.

The action levels to initiate investigation surveys within suspect affected survey units are individual final survey measurements for removable or total surface activity in excess of 75% of the unrestricted use criteria.

If during the investigation survey the initial measurement results cannot be confirmed, the initial measurement results will be flagged as suspect (anomaly) data in the final survey data base. The computer down loads, filed as part of the survey package, will be annotated as such. The investigation measurement results will be considered as the final survey of record and will be included in the calculation of the mean and standard deviation for the survey unit to determine compliance with the unrestricted use criteria.

If during the investigation survey the initial measurement results are confirmed, and remediation and/or reclassification is required, the initial measurement results will be archived as characterization data in the final survey data base. The computer down loads, filed as part of the survey package, will be annotated as such. The results of the post-remediation final survey, or the final survey subsequent to reclassification will be considered as the final survey of record and will be included in the calculation of the mean and standard deviation for the survey unit to determine compliance with the unrestricted use criteria. For instances where resurvey is performed, the final report will be annotated indicating that the initial data for a survey unit has either been replaced or supplemented with subsequent survey data.

If during the investigation survey the initial final survey measurement results are confirmed, but remediation and/or reclassification is not required, the initial measurement results and the investigation survey results will be considered as the final survey of record and will be included in the calculation of the mean and standard deviation for the survey unit to determine compliance with the unrestricted use criteria.