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Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

16805 WCR 19 1/2; Platteville, Colorado 80651

January 5, 1995
Fort St. Vrain
P-95003

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

Docket No. 50-267

SUBJECT: FSV Decommissioning Fire Protection Plan Update

Gentlemen:

This letter transmits Public Service Company of Colorado's (PSCo) second annual update of the Fort St. Vrain (FSV) Decommissioning Fire Protection Plan (DFPP), Revision 3, Sections 1 through 4. A brief summary of the principal changes is also included. PSCo reviewed the changes reflected in this DFPP update and determined that they do not involve an unreviewed safety question, in accordance with the provisions of 10 CFR 50.59.

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

Sincerely,

Mary J. Fisher by *[Signature]*

Mary J. Fisher
Decommissioning Program Director

MJF/DLF

Attachments

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

Regional Administrator, Region IV

Mr. Robert M. Quillin, Director
Radiation Control Division
Colorado Department of Public Health and Environment

SUMMARY OF PRINCIPAL CHANGES

1994 ANNUAL UPDATE

FORT ST. VRAIN

DECOMMISSIONING FIRE PROTECTION PLAN

DFPP ANNUAL UPDATE SUMMARY OF PRINCIPAL CHANGES

Section DFP.1 Fire Protection Organization

Primary revisions include updates in response to Fire Protection Program Audit 94-05 and NRC Inspection 50-267/94-06. Many updates were initiated in order to bring the DFPP current with our progress in Decommissioning and minor clarifications/corrections.

References to BTP 9.5-1, "Fire Protection For Nuclear Power Plants" as our primary guidance document have been removed due to Plant status at this point in time in decommissioning (i.e., primarily an industrial site). Fort St. Vrain (FSV) will be using the NFPA Standards for guidance.

Discussions relating to "qualified fire protection engineer" and fire involving radioactive graphite blocks have been deleted.

Section DFP.2 Fire Protection Systems

In addition to minor clarifications and corrections, discussions relating to NFPA Standards have been revised to delete specific year references, add new Standards, and delete Standards which have been removed from the NFPAs. The Breathing Air System has been returned to service. This will not be reflected in the DFPP since PSC is not using the system. The system has been turned over to the Westinghouse Team and is being used for underwater divers performing component removal activities in the PCRV. The Breathing Air System compressors (2) are located in a separate building at the north-east corner of the Reactor Building and do not create any new or unusual fire hazards.

With decommissioning progressing and plant conversion activities for repowering increasing, changes to plant structures, systems and components are taking place continuously. With that in mind, the 37 Figures at the end of Section DFP.2 have been deleted since their relevance and accuracy are not adequate, and updates would be very difficult to maintain.

In addition, Table DFP.2.1-1, Fort St. Vrain Fire Detector Locations, has been deleted from Section DFP.2. FPOR-12 contains the Table. Having the Table located in one document only will enhance accuracy and ease of maintenance of the Table.

Section DFP.3
Fire Hazards Analysis

Section 3 contained a plant-wide Fire Hazards Analysis (FHA) which reflected operating status, fire protection systems and their status, and fire hazards. The original FHA was for FSV as an operating nuclear plant and assured compliance with 10 CFR 50, Appendix R. Given the plant status at this time, the requirements of Appendix R no longer apply. The National Fire Protection Association (NFPA) Standards are used primarily as guidance documents for FSV. The NFPAs do not require a fire hazards analysis. Hence, Section 3 has been deleted in its entirety.

Section 2.8.5 provides a brief discussion of fire areas and fire barriers within the Reactor and Turbine Buildings, and major areas outside the Plant, but within the Emergency Planning Zone.

Section DFP.4
Fire Protection Regulatory Compliance

Section DFP.4.2 compared FSV's fire protection systems and methods with Branch Technical Position BTP 9.5-1, "Fire Protection For Nuclear Power Plants" guidelines which were acceptable to the NRC for implementing General Design Criterion (GDC) 3 of 10 CFR 50, Appendix A, in the development of a fire protection program. Neither the BTP nor the GDC are applicable to FSV any longer.

Section DFP.4.3 compared FSV's systems, policies and procedures to specific NFPA Standards. The Standards were dated anywhere from 1972 to 1984. Most of the Standards have been revised and new Standards have been provided since those dates. FSV continues to utilize the NFPA Standards as guidance documents, but chooses to use the current versions and review/implement new Standards as applicable. Historical fire protection design and installation information is available within the PSC records storage system.

Based on the discussion above, Section DFP.4 has been deleted in its entirety.

Section DFP.5
Fire Protection Operability Requirements

Section DFP.5 contains the FPORs. The Annual Update does not affect any of the operability requirements. The FPORs are revised individually on an as needed basis. Each revision is accompanied by a 10 CFR 50.59 Safety Evaluation.