



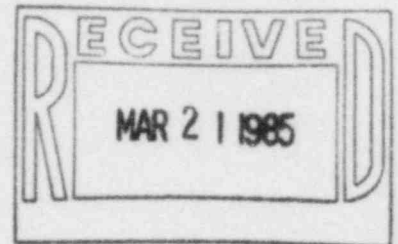
# Public Service Company <sup>of</sup> Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

March 15, 1985  
Fort St. Vrain  
Unit #1  
P-85089

Regional Administrator  
Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

ATTN: Mr. Eric Johnson



Docket No. 50-267

SUBJECT: Draft Technical Specifications To  
Improve Control Rod Reliability

Dear Mr. Johnson:

As discussed in the February 20-22, 1985 site meetings, the required actions to improve control rod and reserve shutdown reliability (identified in Executive Summary section 3.b of the October 16, 1984, audit report), consisted of proposing Technical Specification changes and implementing interim procedures to address the following:

- (1) A weekly control rod exercise surveillance program for all partially or fully withdrawn control rods;
- (2) A Limiting Condition for Operations defining control rod operability and the minimum requirements for rod position indication; and
- (3) A Limiting Condition for Operations and a corresponding surveillance test to define and confirm reserve shutdown system operability.

Discussions were held at the meeting to identify when draft LCO and SR requirements could be submitted to accommodate timely NRC review prior to restart approval. Although these drafts were not projected to be developed until later, through recent concentration of efforts they are hereby included for your review (Attachment 1).

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Draft Technical Specification changes were expressed by your staff as preferable to actual detailed procedures; therefore, this transmittal is considered to fulfill the March 15, 1985 commitment referenced in the February 22 meeting minutes (Page 104). These drafts address items (1) and (2) and are currently being used in development of the interim procedures which will be implemented prior to restart, as committed. In addition, Public Service Company commits to operate the facility in accordance with these draft LCOs and SRs until approval of a future proposal for Technical Specification changes is received.

Item (3) was addressed in an earlier transmittal dated January 28, 1985 (P-85027, page 4-8). All reserve shutdown material was identified to be replaced during the present shutdown, and an expanded surveillance program was to be incorporated into the Technical Specification Upgrade Program, scheduled for submittal by April 1, 1985.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. W. Gahm", with a stylized flourish at the end.

J. W. Gahm  
Manager, Nuclear Production  
Fort St. Vrain Nuclear  
Generating Station

JWG:MAJ/dr