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Company of Colorado

April 19, 1996
Fort St. Vrain
P-96030

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

ATTN: Mr. Michael F. Weber, Chief
Decommissioning and
Regulatory Issues Branch

Docket No. 50-267

SUBJECT: FSV Final Survey Plan -- Contents of Release Record, Survey Package, and QA Description

Dear Mr. Weber:

This letter provides additional information regarding documentation of Final Survey efforts at Fort St. Vrain (FSV). This information was requested during an on-site inspection conducted by members of your staff and by representatives of NRC Region IV. Specifically, this letter discusses three items:

1. Definition of the contents of a Release Record; the Release Record is the documentation for each survey area and for the included survey units, that will be submitted as part of the FSV Final Survey Report. A listing of the minimum elements of a Release Record is included as Attachment 1.
2. Definition of the contents of a Survey Package; the Survey Package includes supporting information for the Release Record, such as raw survey measurement data, and will be maintained as a quality record by Public Service Company of Colorado (PSCo). A listing of the minimum elements of a Survey Package is included as Attachment 2.
3. Explanation of a new Quality Assurance (QA) Oversight Report that will be included with each Final Survey Report submittal; this QA Oversight Report will describe PSCo's oversight activities and the third party verification survey activities conducted for PSCo by GPU Nuclear; in

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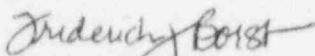
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addition, NRC inspection activities will be addressed. The QA Oversight Report, while not described in the FSV Final Survey Plan, is intended to provide additional support for Final Survey Report documentation. A more complete description is included as Attachment 3.

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

Sincerely,



Frederick J. Borst
Decommissioning Program Director

FJB/SWC

cc: Regional Administrator, Region IV

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

ATTACHMENT 1 to P-96030

RELEASE RECORD CONTENTS

Release Records provide a summary of survey area information and the survey results that are submitted to the NRC in the Final Survey Report. Each survey area is documented in a separate Release Record, which includes documentation for each included survey unit. Release Record contents are defined and controlled in Final Survey Procedure FSV-SC-FRS-I-116, and include at least the following:

<u>Section</u>	<u>Comments</u>
1. Table of Contents	Includes SEG and PSCo approval signatures
2. Survey Area Summary	Identifies operational history, decommissioning and remediation activities, isolation and control measures, and conclusions regarding the acceptability of the survey area
3. Survey Unit Summary	Identifies survey unit classification and survey design; also documents any investigations or remediation
4. Maps	Simplified sketches of survey unit surfaces, also includes simplified system schematics for piping systems, showing each measurement location
5. Statistical Summary Compilation	Summarizes statistical data for Total Surface Activity, Removable Surface Activity, and Exposure Rate (except, an Exposure Rate report is not included for piping system surfaces). Typically includes Upper Confidence Limit, Mean, Maximum, Minimum, Standard Deviation, MDA, Critical Level, Samples Reported, and Samples prescribed
6. Statistical Summary	Provides statistical summary for each test performed and data for each measurement type

Attachment 1 -- Release Record Contents (Continued)

	<u>Section</u>	<u>Comments</u>
7.	Corrected Field Activity Values	Results of each measurement corrected to reporting units (e.g., dpm/100 cm ² , μ R/hr) for each type of measurement.
8.	Graph of Activity vs. Location Number	Graphical data summary showing sample/survey results, guideline value, critical level, MDA, activity/exposure rate, and measurement location number
9.	Summary of Background Correction Values	Identifies values used to correct field background values (e.g., PIC corrections)
10.	Summary of MDA	Identifies MDA used on each download; also includes critical level and a definition of the medium code used to identify appropriate background
11.	Summary of Efficiency Values	Identifies efficiency of each detector used (except not applicable to exposure rate)
12.	Detection Equipment Used	Identifies instruments and detectors used in the survey

ATTACHMENT 2 to P-96030

SURVEY PACKAGE CONTENTS

Survey Packages provide complete documentation of the survey effort for each survey area, and for the included survey units, from initial package development, through instructions for data collection, raw measurement data, documentation of data analysis, description of any investigations or data replacements, and final review and closure. The Survey Package contains sufficient information to permit calculations to be verified. Each survey area is defined and documented in a separate Survey Package. Survey Package contents are defined and controlled in Final Survey Procedures FSV-SC-FRS-I-102, for surfaces and structures, and FSV-SC-FRS-I-114, for systems, and include at least the following:

<u>Section</u>	<u>Comments</u>
1. Survey Package Cover Sheet	Includes approvals for various package phases
Or,	
For systems, Plant System/ Penetration Survey Package Cover Sheet	Includes approvals for various package phases
2. Initial Survey Package Design	Includes initial classification
Or,	
For systems, Initial Plant System Survey Package Design	Includes initial classification; not applicable to penetrations
3. Survey Area History File	Radiological background information
Or,	
For systems, Plant System Survey Unit History File	Radiological background information

Attachment 2. Survey Package Contents (Continued)

	<u>Section</u>	<u>Comments</u>
4.a	General Survey Instructions	General survey process information
	<i>and</i>	
	Specific Survey Instructions	Instructions specific to the survey unit
	<i>Or,</i>	
4.b	<i>For penetrations, Plant Penetrations Final Specific Survey Instructions</i>	Survey instructions for penetrations
5.	Survey Maps	Simplified sketch of survey unit, showing each measurement location; for piping systems, simplified system schematic sketches; may include photos to identify measurement locations
6.	Download Report Cover Sheet	Summarizes downloads of measurement data
7.	Survey Download Data Form	Documents download of data from field detector instrument into data computer
8.	Download Report/Radiochemistry Analysis Report	Raw measurement data from field, does not include background corrections
9.	Package Validation Checklist	Documents review and completion of measurements
10.	Release Record	Described in Attachment 1 to this letter

ATTACHMENT 3 to P-96030

QUALITY ASSURANCE OVERSIGHT REPORT

The validity of final survey data is an essential element in the process of terminating the Fort St. Vrain 10 CFR Part 50 license. PSCo, our decommissioning contractor (the Westinghouse Team), and the NRC have all taken strong measures to ensure that the FSV Final Survey Report is a complete and accurate record, providing solid documentation that the FSV facility has been decontaminated to meet the established acceptance criteria.

Quality Assurance/Quality Control (QA/QC) survey activities performed by the Westinghouse Team are documented in the Final Survey Report, as described in the FSV Final Survey Plan. To provide further confidence that the final radiological condition of the FSV site is adequately documented in the Final Survey Report, PSCo intends to document additional QA measures in a QA Oversight Report; this report will be updated and submitted along with each phase of the Final Survey Report.

The QA Oversight Report will describe PSCo's principal QA oversight activities, including the following:

- Audits
- Surveillances and/or monitorings of ongoing survey activities
- Review of procedures and technical basis documents
- Review of Release Records and supporting survey packages
- Verification of calculated measurement results
- Third party verification survey activities performed for PSCo by GPU Nuclear
- NRC inspection activities and PSCo's responses to any identified findings
- Problem Reports, corrective actions, and resolutions of deficiencies