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Public Service  
Company of Colorado

September 11, 1996  
Fort St. Vrain  
P-96068

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: **Proposed Sampling and Survey Plan for Effluent Pathway,  
Fort St. Vrain Final Survey Program**

Dear Mr. Weber:

This letter describes Public Service Company of Colorado's (PSCo) plans for demonstrating that the liquid effluent pathway and surrounding open land areas satisfy the 10 mrem/year criteria provided in the Fort St. Vrain (FSV) Final Survey Plan, and requests NRC approval of a revised sampling and survey plan for this area.

The FSV Final Survey Plan addresses the liquid effluent pathway as part of open land areas and does not provide more specific requirements for this area. PSCo and our decommissioning contractor, the Westinghouse Team/Scientific Ecology Group (WT/SEG), consider that a specific sampling and survey plan is appropriate for the liquid effluent pathway because it has been well characterized and can be reasonably divided into areas with different contamination potentials. During operational and decommissioning releases, over 1000 characterization samples/measurements were taken. Based on the measurement results, PSCo and the WT/SEG consider that the liquid effluent pathway and surrounding areas can be divided into three survey levels, with reduced sample frequencies, survey frequencies, and scan requirements appropriate for the potential for contamination.

The proposed survey treatment for the FSV liquid effluent pathway is described in a WT/SEG Technical Basis Document (TBD), *Final Survey Requirements for the Liquid Effluent Pathway*, FSV-FRS-TBD-209, attached to this letter. This TBD describes the specific sampling and survey plans, the historical characterization efforts, and the

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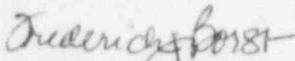
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technical and ALARA justification for the proposed survey treatment. The site-specific guideline values for residual concentrations of radionuclides in soil and water, and the RESRAD computer code used to derive them are also described.

PSCo and the WT/SEG consider that the sampling and surveying program described in the attached TBD, developed specifically for the FSV liquid effluent pathway and surrounding areas, represents a conservative survey effort at a cost savings of approximately \$1,000,000 compared to current requirements for affected open land areas, and is in accordance with sound ALARA principles. To meet our project schedule commitments, PSCo and the WT/SEG have initiated final survey efforts based on this approach, and we request NRC approval as soon as reasonably practicable. We acknowledge that survey efforts for these packages are being undertaken at our risk and we note that survey documentation packages can be supplemented or modified prior to submittal to the NRC, to insure resolution of any comments.

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

Attachment

FJB/SWC

cc: Regional Administrator, Region IV

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