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December 19, 1996
Fort St. Vrain
P-96105

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

Docket No. 50-267

SUBJECT: QUARTERLY SUBMITTAL OF THE 10 CFR 50.59 REPORT OF
CHANGES, TESTS AND EXPERIMENTS FOR FORT ST. VRAIN
DECOMMISSIONING

REFERENCE: NRC Letter dated November 23, 1992, Erickson to
Crawford (G-92244)

Gentlemen:

This letter transmits the quarterly 10 CFR 50.59 Report of Changes, Tests, and Experiments affecting Decommissioning of the Fort St. Vrain (FSV) Nuclear Station. The attached report includes a description of each change, test and experiment as well as a summary of the safety evaluation. This report covers the period of September 1, through November 30, 1996.

This report is being submitted pursuant to Condition (b)(2) of the "Order Approving Decommissioning Plan and Authorizing Decommissioning of Facility", transmitted in the referenced letter, which states the following:

"The licensee shall submit, as specified in 10 CFR 50.4, a report containing a brief description of any changes, tests and experiments, including a summary of the safety evaluation of each. The report must be submitted quarterly."

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If you have any questions concerning this report, please contact
Mr. M. H. Holmes at (303) 571-7633.

Sincerely,



Frederick J. Borst
Decommissioning Program Director

FJB/JRJ

Attachment

cc: Mr. Michael F. Weber, 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

DECEMBER 1996
QUARTERLY 10 CFR 50.59 REPORT OF CHANGES, TESTS AND EXPERIMENTS
FOR FSV DECOMMISSIONING

Background:

The following is a brief discussion of 10 CFR 50.59 changes to the Fort St. Vrain (FSV) facility or procedures as described in the Decommissioning Plan (DP) and tests and experiments not described in the DP, in the time period from September 1, through November 30, 1996.

The quarterly decommissioning reports are submitted pursuant to Paragraph (b)(2) of the FSV Decommissioning Order (issued in NRC letter dated November 23, 1992, Erickson to Crawford), which states:

"The licensee shall submit, as specified in 10 CFR 50.4, a report containing a brief description of any changes, tests and experiments, including a summary of the safety evaluation of each. The report must be submitted quarterly."

Changes to the FSV Facility or its Procedures as Described in the Decommissioning Plan

There were no changes to the FSV facility as it is described in the DP during this reporting period. There were changes to the updated FSV Final Survey Plan (FSP), discussed in Section 4 of the DP. The preface to the FSP contains criteria that permit implementation of certain revisions to the FSP without prior NRC approval. A safety evaluation was performed on recently proposed FSP revisions which determined these criteria were met, as discussed below.

1. Changes to the FSP Revising Criteria for Acceptance of a Survey Area or Unit for the Final Survey

Final Survey Plan (FSP) Section 3.8.4, "Turnover for Final Survey", lists a number of conditions to be satisfied prior to acceptance of a survey area or unit for the final survey. One of the conditions listed is that results of operational radiological surveys be included in Final Survey packages.

This was revised so that the source of radiological survey results is not strictly limited to operational surveys, but can also include characterization surveys and surveys or information used in the development of, or in response to, Radiological Occurrence Reports (RORs). It is appropriate to include a summary or synopsis of the results of previous surveys, including (but not limited to) operational surveys, to provide some historical perspective of the

survey area or unit and to support that the area or unit has been adequately remediated and is ready for final survey.

FSP Section 3.8.4 and Section 3.8.14, "Access Control Measures", state that all decommissioning and/or decontamination activities in a survey area or unit must be completed prior to final survey. An additional requirement states that all tools and equipment not required to perform the survey must be removed from the area.

These sections were revised to permit final survey of the survey area or unit to commence even with decommissioning/decontamination activities underway, provided adequate controls are in place to minimize the potential for contamination. In addition, final survey could take place with tools and equipment in the survey area or unit, provided the tools or equipment do not interfere, either physically or radiologically, with the final survey.

Draft NUREG/CR-5849, Section 2.3.5, Final Status Survey, states, in part:

"A survey to determine the final condition of the site is performed after decontamination activities (if any were required) are complete..."

At FSV, this survey is actually the initial final survey (which is used to establish the final radiological condition of the area, if no further remediation is required), remediation control surveys (if required), 10% verification surveys (if required), any additional validation/verification surveys required, and QC surveys. Determination of the final condition of the site is concluded only after all required surveys are performed. Although, in some instances the final survey may begin prior to completion of all decontamination activities, the collection of survey results constitutes the basis for conclusion of the final condition.

Also, it is not necessary to remove all tools and equipment from a survey area if they do not interfere with the performance of the final survey. Many areas, along with the tools and equipment in these areas, will continue to be used for the repowering of FSV.

It was determined that the FSP revisions described above do not constitute an unreviewed safety question and meet the following additional criteria defined in the FSP that authorize PSCo to make changes to the FSP without prior NRC approval:

- The proposed revisions do not require changes to the Decommissioning Technical Specifications.
- The proposed revisions do not reduce the required survey frequency for the classification of a survey unit.
- The proposed revisions do not increase the action levels for

conducting investigation and followup surveys.

○ The proposed revisions do not affect the statistical treatment of survey data in a manner which could reduce the confidence that the site meets the criteria for unrestricted use.

It was concluded that the FSP revisions described above do not constitute an unreviewed safety question, and may be implemented without prior NRC approval in accordance with the FSP requirements.