

Mr. A. Clegg Crawford
Vice President, Electric Operations
Public Service Company of Colorado
P.O. Box 840
Denver, Colorado 80201-0840

January 7, 1997

SUBJECT: PROPOSED SAMPLING AND SURVEY PLAN FOR THE EFFLUENT PATHWAY,
FORT ST. VRAIN FINAL SURVEY PROGRAM

Dear Mr. Crawford:

The Nuclear Regulatory Commission staff has reviewed the Public Service Company of Colorado's (PSC) September 11, 1996, submittal (P-96068) entitled, "Proposed Sampling and Survey Plan for Effluent Pathway, Fort St. Vrain Final Survey Program." We have enclosed a number of comments that need to be resolved before final approval of the submittal.

If you have any questions, please contact me, at (301) 415-6702, or David Fauver, at (301) 415-6625.

Sincerely,

[ORIGINAL SIGNED BY:]

Clayton L. Pittiglio, Project Manager
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 50-267
License No. DPR-34

Enclosure: As stated

cc: See attached list

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NUCLEAR REGULATORY COMMISSION
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Sincerely,

A handwritten signature in cursive script, reading "Clayton L. Pittiglio", is written over the typed name.

Clayton L. Pittiglio Project Manager
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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Fort St. Vrain
Docket No. 50-267
License No. DPR-34

Letter dated: January 7, 1997

cc:

Mr. Wayne H. Brunetti
President, and
Chief Executive Officer
Public Service Company
of Colorado
P.O. Box 840
Denver, CO 80201-0840

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Chairman, Board of County Commissioners
of Weld County, Colorado
Greeley, CO 80631

Regional Representative
Radiation Programs
Environmental Protection Agency
1 - Denver Place
999 18th Street, Suite 1300
Denver, CO 80202-2413

Radiation Control Division (RCD-DO-B1)
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Commitment Control Program Coordinator
Public Service Company of Colorado
16805 Weld County Road 19-1/2
Platteville, CO 80651

Mr. M. H. Holmes
Nuclear Licensing Manager
Public Service Company of Colorado
16805 Weld County Road 19-1/2
Platteville, CO 80651

NRC Comments on Public Service Company of Colorado Submittal, "Proposed Sampling and Survey Plan for Effluent Pathway, Fort Saint Vrain Final Survey Program," September 11, 1996

- 1) The RESRAD analysis for determining the site-specific guideline values used a scenario that assumes the open land areas will continue to be used as pasture land. Additional information is needed to support the assumed future land use and potential future dose to members of the public. PSC should use the default parameters from Scenario C of PG-8-08 to determine the most conservative unrestricted use dose and compare this dose with the dose using the site-specific guideline values PSC believes to be more realistic. Approval of the alternate scenario will depend on the magnitude of the differences between the baseline and guideline values, the time required for the dose from Scenario C to be reduced to acceptable levels by radionuclide decay (which provides an indication of how long the alternate land use scenario would need to be in place), and the strength of the justification for the alternative scenario.
- 2) Were subsurface samples collected during characterization to support the PSC conclusion that contamination is limited to the surface? If so, please provide the results. If not, please provide additional information supporting this conclusion.
- 3) Were each of the soil/sediment samples analyzed for all of the radionuclides listed in Table 7.1? What information was used to select the radionuclides listed in Table 7.1? Why was Sr-90 not included in the table?
- 4) The characterization data were used as the primary justification for reducing the sample size in the effluent pathway survey units. Please provide the effluent pathway characterization results for NRC review. There is insufficient justification provided for not providing sample frequencies consistent with NUREG-5849 for affected areas. If characterization data meet the same data quality objectives as the final survey, these data can be used as final survey data.
- 5) Was the potential for groundwater contamination evaluated?
- 6) The Jay Thomas Ditch was designed as Affected Class 1 thus requiring 100% scan. Table 7.4 designates the area as Affected Class 1 but does not reflect the 100% scan for the Jay Thomas Ditch. What is the basis for this discrepancy?
- 7) What is the area of the sediment storage area?

Enclosure

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If you have any questions, please contact David M. Fauver at (301) 415-66251 or I can be contacted at (301) 415-6702.

Sincerely,
Clayton L. Pittiglio, Project Manager
Low-Level Waste and
Decommissioning Projects Branch
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