

AUG 27 1985

Docket: 50-267

Public Service Company of Colorado
ATTN: O. R. Lee, Vice President
Electric Production
P. O. Box 840
Denver, Colorado 80201-0840

Gentlemen:

We have reviewed your December 30, 1983, application "Proposed Changes to the Inservice Inspection and Testing Requirements" and find that additional information is needed. The findings of our review were discussed with members of your staff during meetings held during the week of July 22, 1985, on the Technical Specifications Upgrade Program.

We have coordinated our review with corresponding portions of the Fort St. Vrain Technical Specification Upgrade Program now in progress. This has been done by associating as well as possible the corresponding "Draft Items" from the upgrade program with each of the surveillances reviewed. In doing this we have found many Draft Upgrade Items which are unsatisfactory, although in a few cases we find them superior to the proposed surveillances. Identification and discussion of these items now appears in the enclosure (identified by following the assigned number with a "U" for upgrade).

Major items of importance are:

- ° The December 30, 1983, submittal does not complete the surveillance program committed to by the licensee. We observe that together with the material addressed by Fort St. Vrain License Amendment 33 the current review deals with the higher priority items, but some Category II systems remain as well as the majority of the Category III and IV systems. Whether these surveillances should be addressed in the context of the present technical specifications or as part of the upgrade program should be based on the anticipated rate of progress of the upgrade program.
- ° Many of the systems we addressed were reviewed in the context of the July 1, 1983, edition of the ASME Code which includes "Rules for Inspection and Testing of Components of Gas-Cooled Plants," (Section XI, Division 2). This reference expedited our review, provided suitable comparability with light water reactors, and otherwise strengthened the quality of the Fort St. Vrain surveillance program. It is our recommendation that this code be used wherever practicable. While there may be some necessary exceptions both parties will have to take, our review has illustrated the benefits of consistency, completeness and efficiency in spite of some potential difficulties. This practice would be similar to that used for older LWRs.

RIV:RSB/ES (w)
PCWagner:gb
8/22/85

ES RSB
REIreland
8/26/85

RSB DRH
DRHunter
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- ° Fort St. Vrain License Amendment 33 and document prepared by ASTA Inc., which formed part of the basis were also reviewed. One of the ASTA recommendations was that PSC investigate the application of visual examination techniques to certain portions of the thermal barriers in the lower plenum. While it was concluded in the SER supporting Amendment 33 that no practical access was available for such examinations, we believe that this issue should not remain closed. It is our opinion that PSC should commit to a continuing awareness of advancements in inspection techniques, particularly those involving miniaturization of instrumentation, and be prepared to implement such inspections should the technology become available.

A copy of our evaluation is enclosed for your review and comment. It is our understanding, based on discussions at the above mentioned meeting, that PSC will provide a resubmittal of these requirements within 90 days of your receipt of this evaluation.

Since this reporting requirement relates solely to the Fort St. Vrain Station, OMB clearance is not required under P.L. 96-511.

Sincerely,

"Original Signed By:
D. R. HUNTER"

Dorwin R. Hunter, Chief
Reactor Safety Branch

Enclosure:
Evolution of ISI/TSI

cc:
Mr. D. W. Warembourg, Manager
Nuclear Engineering Division
Public Service Company of Colorado
P. O. Box 840
Denver, Colorado 80201

Mr. David Alberstein, 14/159A
GA Technologies, Inc.
P. O. Box 85608
San Diego, California 92138

Kelley, Stansfield & O'Donnell
Public Service Company Building
550 15th Street, Room 900
Denver, Colorado 80202

Public Service Company
of Colorado

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Chairman, Board of County Comm.
of Weld County, Colorado
Greeley, Colorado 80631

Regional Representative
Radiation Programs
Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80203

Mr. H. L. Brey, Manager
Nuclear Licensing/Fuels Div.
Public Service Company of Colorado
P. O. Box 840
Denver, Colorado 80201

J. W. Gahm, Manager, Nuclear
Production Division
Fort St. Vrain Nuclear Station
16805 WCR 19½
Platteville, Colorado 80651

L. Singleton, Manager, Quality
Assurance Division
(same address)

Colorado Radiation Control Program Director

bcc distrib. by RIV:

RPB	Resident Inspector
RSB	Section Chief, RSB/ES
P. Wagner, RSB/ES	R. Denise, DRSP
RIV Official Reading File	
CPB/NRR	D. Eisenhut, D/DL
K. Heitner, ORB3	J. Taylor, IE
T. King, ARC	G. L. Plumlee, TSRG

R. D. Martin, RA
EP&RPB
E. Haycraft, DRSP/LA
E. Butcher, ORB3
G. Lainas, DL
E. Jordan, IE

Enclosure

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EVALUATION OF TECHNICAL SPECIFICATION CHANGES
FOR INSERVICE INSPECTION AND TESTING PROPOSED

ON DECEMBER 30, 1983

PUBLIC SERVICE COMPANY OF COLORADO

FORT ST. VRAIN NUCLEAR GENERATING STATION

DOCKET 50-267

INTRODUCTION

By letter dated December 30, 1983 (Reference 1) the Public Service Company of Colorado (PSC) proposed changes to the Fort St. Vrain Technical Specifications concerning inservice inspection and testing requirements (ISIT). These proposed changes are a continuation of the ISIT upgrade program initiated in response to a commitment in Section 3.3 of the Safety Evaluation Report of January 20, 1972 (Reference 2) to review the in-service inspection program five years following the start of commercial operation. The NRC and PSC agreed to a staged and prioritized upgrade program with those systems of highest priority identified as Category I (Reference 3). Our reviews and revisions of essentially all the Category I systems were issued on March 8, 1983 (Reference 4) as License Amendment No. 33 together with a supporting Safety Evaluation Report. Reference 1 addresses a single Category I surveillance interval and certain Category II and III changes but does not complete the upgrade program. We used the ASME Boiler and Pressure Vessel

Code, Section XI, Division 2, "Rules for Inspection and Testing of Components of Gas Cooled Reactors," as guidance in performing our review. This was in addition to our usual custom review practice for Fort St. Vrain that is based upon operating history and experience, consideration of safety importance based on safety analyses, and the unique design features of the facility.

GENERAL COMMENTS

- 1) The NRC has not yet formally adopted Division 2, Section XI of the ASME Code. This is due to both a lack of resources for the NRC to participate in the final stages in the Code's development and to a technical concern. The technical concern pertains to Articles 1GB-1221, "Exemptions Based on Component Function," and 1223, "Exemptions Based on Component Size," which would exempt from examinations those connections to the primary system for which failure would not result in a rate of depressurization greater than that used for the design basis accident. While we believe exemptions for connections of the size of instrument lines are acceptable, as is permitted for LWRs, substantially larger sizes, and certainly those approaching the reference cross sectional area for a design basis accident should not be exempted from review.

In spite of the fact that the Division 2 Code has not been adopted by the NRC it is useful for guidance purposes in many areas of gas reactor ISIT. In the present review, changes in many surveillance requirements for safety related water systems were proposed. For this reason sections of the ASME Code dealing with pumps (Article 1GP) and valves (Article 1GV) were particularly relevant to our review. In general, these sections were modeled after corresponding sections of the ASME Code for LWRs and are judged in many cases directly pertinent to inspection and testing of the safety related water systems of Fort St. Vrain.

We have in the past and continue to recommend that Public Service of Colorado commit to referencing applicable sections of the Division 2 ASME Code. By reference to the Code both the presentation and the review of the inspection and testing program is expedited and many details of procedures practice are clarified.

- 2) As stated previously the inservice inspection upgrade program is not yet complete. In accordance with Reference 3, the following systems remain outstanding:

TABLE 1

CATEGORY II SYSTEMS

CONTROL AND ORIFICE ASSEMBLY (12)
NITROGEN SYSTEM (25)
EMERGENCY FEED AND CONDENSATE SYSTEM (31)
PURIFICATION COOLING WATER SYSTEM (47)

CATEGORY III SYSTEMS

FUEL STORAGE FACILITY AUXILIARY SYSTEM (14)
CONTROL COMPLEX HVAC (75)
FIRE PUMP HOUSE HVAC (75)
AUXILIARY BOILER FUEL OIL SYSTEM (84)
ESSENTIAL ELECTRIC POWER SYSTEM (92)

CATEGORY IV SYSTEMS

FEED AND CONDENSATE SYSTEMS (31, 32, 33)
CIRCULATING WATER SYSTEM (41)
DECAY HEAT REMOVAL HX (42)
FIRE PROTECTION SYSTEM (45)
CO₂ SYSTEM (51)
TURBINE STEAM SYSTEMS (52, 53, 54, 55)

TABLE 1 (Continued)

RADIOACTIVE LIQUID WASTE STORAGE SYSTEM (62)
RADIOACTIVE GAS WASTE SYSTEM (63)
FUEL STORAGE WELL HVAC (73)
PCRV ENVIRONMENT MONITORING (73)
CONTROL COMPLEX ENVIRONMENT MONITORING (75)
AUXILIARY BOILER (84)
PRIMARY AND AUXILIARY ELECTRIC POWER SYSTEMS (92)
COOLANT MEASUREMENT DISPLAY SYSTEM (93)
OVERALL PLANT CONTROL SYSTEM (93)
PCRV INSTRUMENTS AND DATA ACQUISITION SYSTEM (93)
FAST GAS AND IODINE SAMPLING SYSTEM (93)
CONTROL ROD AND ORIFICING CONTROL SYSTEM (93)
SG T/C AND S/G INSTRUMENTATION SYSTEM (93)
ANALYTICAL INSTRUMENTATION SYSTEM (93)

The review of the surveillance requirements for these systems is expected to be accomplished mainly in the comprehensive Technical Specification Upgrade Program recently initiated by PSC (Reference 5). This program is organizing the Technical Specifications in the general format of NRC's PWR Standard Technical Specifications.

In Reference 3 PSC provided a listing, divided into the four priority categories, of all the systems to be reviewed in the context of the 1972 commitment regarding upgraded ISIT requirements given in Reference 2. Before we can consider PSC is in compliance with its 1972 commitment PSC should review this listing, make modifications if needed, and then certify to its completeness.

EVALUATION

The proposed changes submitted and reviewed by this amendment action are as follows:

TABLE 2

CATEGORY I SYSTEM

SR 5.3.9 SAFETY VALVES SURVEILLANCE

CATEGORY II SYSTEMS

SR 5.2.7 WATER TURBINE DRIVE SURVEILLANCE
SR 5.2.8 BEARING WATER PUMP AND MAKEUP PUMP SURVEILLANCE
SR 5.2.9 HELIUM CIRCULATOR BEARING WATER ACCUMULATORS SURVEILLANCE
SR 5.2.10 (b,d) FIRE WATER SYSTEM/FIRE SUPPRESSION WATER SYSTEM SURVEILLANCE
SR 5.2.16 (g) PCRV CLOSURE LEAKAGE SURVEILLANCE REQUIREMENTS
SR 5.2.21 ACM TRANSFER SWITCHES, VALVES AND INSTRUMENTS
SR 5.2.24 REACTOR AUXILIARY COOLING WATER SYSTEMS SURVEILLANCE
SR 5.3.4 SAFE SHUTDOWN COOLING VALVES SURVEILLANCE
SR 5.4.4 PCRV COOLING WATER SYSTEM TEMPERATURE INSTRUMENTS SURVEILLANCE
SR 5.4.5 PCRV COOLING WATER SYSTEM FLOW INSTRUMENTS SURVEILLANCE
SR 5.5.3 REACTOR BUILDING EXHAUST SYSTEM SURVEILLANCE

TABLE 2 (Continued)

CATEGORY III SYSTEM

SR 5.7.2 FUEL STORAGE FACILITY SURVEILLANCE

Our evaluation of each of these proposed changes is stated below.

1. SR 5.2.7 - Water Turbine Drive Surveillance

- a) The proposed change would extend the annual test interval for one circulator and the associated water supply valving in each loop to the next scheduled plant shutdown if the test was not performed during the previous year. We find this proposed change acceptable provided that the surveillance interval does not exceed 18 months on the basis that (1) operating experience has illustrated sufficiently satisfactory performance of this system such that no significant hazard is created by an extension of this test interval, (2) potential hazards from an additional shutdown and startup transients would be avoided and (3) decay heat can still be removed via steam driven circulators or the Liner Cooling System. The provision to not have the surveillance interval exceed 18 months is consistent with NRC Standard Technical Specifications for LWRs and ensures a minimum surveillance interval.

- b) The proposed change would extend the annual test interval for safety valves in the water turbine supply lines to the next scheduled plant shutdown if the test was not performed during the previous year. We find this proposed change acceptable, provided that the surveillance interval does not exceed 18 months, based on the same reasons as given in comment 1 (a) above.

- c) The phrase "every three months" has been changed to read "quarterly" for the functional testing of both turbine water removal pumps and the turbine removal tank overflow to the reactor building sump. We recommend that the standard technical specification terminology of 92 days be used rather than that proposed.

1U.¹ Draft Item 4.5.1.1b.1 - Helium Circulator

- Power Operation and Low Power

The turbine water removal pumps would be tested only once per refueling cycle, an extension of the surveillance interval inconsistent with both the ASME Code and the current 92 day interval. No mention is made of surveillance of turbine water drain tank overflow. Our concerns in this regard are: (1) Why should the test interval for the turbine water removal pumps be extended to once per refueling cycle? and (2) Why is surveillance of the turbine water drain tank overflow not specified?

2. SR 5.2.8 - Bearing Water Pump and Makeup Pump Surveillance

The bearing water makeup pumps have been added to this surveillance. We recommend that circulating bearing water pumps be added to the title for consistency.

- a) The phrase "every three months" has been changed to read "quarterly" for the operation of the Normal Makeup Pump in the recycle mode. We recommend that the terminology of STS of 92 days be used rather than that proposed.

¹U indicates that this is an item from the Fort St. Vrain Technical Specification Upgrade program that corresponds to the Technical Specification under review immediately preceding.

- b) The phrase "every three months" has been changed to read "quarterly" for the functional testing of the Emergency Makeup Pump. We recommend that the terminology of STS of 92 days be used rather than that proposed.

- d) The proposed surveillance for the bearing pumps would provide for a functional test of the pumps and associated instruments and controls at each scheduled plant shutdown, or at the next scheduled plant shutdown if less than a year has elapsed from the previous test. This schedule would not disrupt normal plant operation and provides a test not previously required. We find this surveillance acceptable as it is consistent with current practice in the application of the ASME Code to current plants, provided the surveillance interval does not exceed 18 months.

2U. Draft Item 4.5.1.1.b2 - Helium Circulator

- Power Operation and Low Power

The bearing water makeup pump would be tested once per refueling cycle and no mention of the emergency makeup pump is made. This is inconsistent with SR 5.2.8 and the ASME Code. In addition, no mention of bearing water pump surveillance (SR 5.2.8d) is made. Therefore, information should be provided on: (1) Why is the bearing water makeup pump surveillance inconsistent with SR 5.2.8 and the ASME Code? and (2) Why is there no surveillance requirement for the bearing water pump?

3. SR 5.2.9 - Helium Circulator Bearing Water Accumulators

The proposed test interval for testing of the helium circulator bearing water accumulators, instruments and controls would be extended from monthly to quarterly. The licensee justifies this change on a review of prior test results which shows satisfactory performance. Based on this justification we find the proposed change acceptable. We recommend that the quarterly interval be stated as 92 days.

3U. Draft Item 4.5.1.1.a - Helium Circulator

- Power Operation and Low Power

This Draft Item requires functional testing of the bearing water accumulators system at 31 day intervals but does not identify testing of the instrumentation and controls as an explicit requirement. In addition, annual calibration of the instruments is not indicated as is done in SR 5.2.9. Therefore, information should be provided addressing: (1) Why does the proposed surveillance of the accumulators omit required testing of the instrumentation and controls? and (2) Why is annual calibration not indicated?

4. SR 5.2.10 - Fire Water System/Fire Suppression Water System Surveillance

- b) A reduction by 5 percent in the flow and head testing requirements for the firewater pumps has been proposed to account for pump degradation. Degradation to this degree is acceptable under the

ASME Code and the pump performance continues to exceed the minimum performance requirements by a sufficient margin. We find the proposed changes acceptable.

- d) The fire suppression water system pressure is changed to read "275 feet water gauge" from "125 psig." This is an acceptable change.

4U. Draft Item 4.5.4

Why does the system functional test in Part f.5 not provide for minimum flow and head measurements? To be acceptable this Draft Item should be consistent with the requirements of the ASME Code.

5. SR 5.2.16 - PCRV Closure Leakage Surveillance Requirements

- g) The proposed change would require once during each refueling cycle a leakage test and for each helium purification cooler well, a calibration of the well pressure monitoring instruments and a functional test of the instruments and controls used to automatically isolate the purification system. The addition of this surveillance requirement verifies the operability of instruments used to monitor containment integrity. To make a judgement on the acceptability of the proposed leakage test a description of how this requirement meets the intent of the ASME Code, Article 1GB, "Examination and Inspection," should be provided.

5U. Draft Item 4.6.4.5.a.2 - PCRV Integrity

Draft Item 4.6.1.3 - Interspace Pressurization

It is not clear that these two surveillances together contain the essential requirements of SR 5.2.16(g). If they do not, then SR 5.2.16(g) should be included explicitly. Alternatively, (1) each Draft Item could be modified to clarify that it pertains to "well" closures as well as "penetration" closures, or (2) a definition could be added that clarifies that a "well" closure is also a penetration closure.

6. SR 5.2.21 - ACM Transfer Switches, Valves, and Instrument Surveillance

The surveillance requirement has been retitled from the previous title of SR 5.2.21 - Handvalve and Transfer Switch Surveillance.

- a) For those valves and transfer switches that must be manually positioned for actuation of the Alternate Cooling Method (ACM) mode of operation, the licensee proposes to change the surveillance interval to annually or at the next scheduled plant shutdown if such a test was not performed during the previous year. While we understand that full operation of these valves and switches is not possible during plant operation, we nevertheless believe that it is necessary to demonstrate operability of these components more frequently. Thus we do not find this proposed change acceptable and recommend that the original surveillance interval for an operability check of this equipment be maintained (4 to 8 months) and a full functional test be performed at annual or at refueling intervals not to exceed 18 months.

- b) A new surveillance requirement for calibration at each refueling interval has been proposed for local indicators for the helium purification dryer inlet temperature, for the helium purification pumpdown line pressure and for the reactor plant cooling water surge tank cover gas pressure. From the information provided it is not clear that: (1) these proposed surveillances are sufficient to assure operational readiness of these components, and (2) the components to be given surveillance provide a complete set to assure operational readiness of the systems they serve. Therefore, information needs to be provided addressing the above.

6U. Draft Item 4.7.8.c.2 - ACM Diesel Generator

This Item pertains to the surveillance of the ACM transfer switches. The proposed 18 month surveillance interval for the ACM switches is longer than the surveillance intervals proposed for these same switches in SR 5.2.21 and is not considered acceptable for the same reason and discussed in comment 6(a) above. In addition, it should be explained where the remaining surveillances have been located in the Upgrade Technical Specifications.

7. SR 5.2.24 - Reactor Auxiliary Cooling Water Systems Surveillance

The title of this surveillance requirement has been changed from Circulation Water Makeup System Surveillance. We find this acceptable.

- b) The surveillance interval for functionally testing each circulating water pump is proposed to be extended to monthly from weekly. As the monthly interval is in accordance with the ASME Code and surveillance requirements have been added to the proposed change regarding instrument calibration, pump performance capability and mechanical condition, we find the proposed change acceptable.
- d) The proposed surveillance requirement would be a new requirement pertaining to the integrity of the circulating water makeup pond embankments. The proposed addition is consistent with LWR service water requirements and is considered acceptable.
- e) The proposed surveillance requirement would be a new requirement pertaining to the testing of each service water pump and the associated instruments. We have reviewed these requirements and have found them in partial accord with the ASME Code. We would find them acceptable if the licensee either conforms to the detailed requirements of the ASME Code or provides an acceptable alternative.
- f) The proposed surveillance requirement would be a new requirement pertaining to the testing of each reactor plant cooling water pump and the associated instruments. We have reviewed these

requirements and have found them in partial accord with the ASME Code. We would find them acceptable if the licensee either conforms to the detailed requirements of the ASME Code or provides an acceptable alternative.

- g) The proposed surveillance requirement would be a new requirement pertaining to the testing of each purification cooling water pump and the associated instruments. We have reviewed these requirements and have found them in partial accord with the ASME Code. We would find them acceptable if the licensee either conforms to the detailed requirements in accordance with the ASME Code or provides an acceptable alternative.
- h) The proposed surveillance requirement would be a new requirement pertaining to the testing and calibration of instruments and valves used for automatic insolation of portions of the reactor plant cooling water system. We find that an interval of each refueling cycle not to exceed 18 months for a full stroke test of each valve is acceptable for those valves that cannot be tested during plant operation. However, the interval for a functional check of those valves and instruments capable of being tested by a partial stroke should be performed semi-annually in accordance with the precedent of SR 5.2.21 or quarterly in accordance with the guidance of the ASME Code.

7U. Draft Items

The Draft does not recognize the Reactor Auxiliary Cooling Water System as a comprehensive system and appears to make no provisions for some of the surveillances described in SR 5.2.24. For example, in Section 4.7.4, "Service Water System" no specific surveillances are required although an operability demonstration is made by reference to surveillance testing of the diesel generators (4.8.1.1.2). However, 4.8.1.1.2 has no explicit requirements pertaining to pumps, valves and instruments of this system. Specific surveillance requirements for safety systems is required by the ASME Code and should be added for the Reactor Auxiliary Cooling Water System.

8. SR 5.3.4 - Safe Shutdown Cooling Valves Surveillance

The licensee proposes to test valves used for safe shutdown cooling on an annual basis or following scheduled plant shutdown. This is not acceptable except for cases where it is not physically possible to perform a more frequent surveillance. For those valves that can be tested during reactor operation, are required to initiate and function during safe shutdown cooling, and which are not called upon to operate during normal plant operation, the licensee should provide testing requirements and intervals in conformance with the ASME Code.

8U. Draft Item 4.5.2.1.a - Steam Generator

The only pertinent surveillance for valves of the safe shutdown cooling system is given by the above Draft Item which requires testing at 18 month intervals of the flow through the emergency feedwater header and the emergency condensate header to the steam generators. This is not satisfactory because it does not meet the objectives of the ASME Code which requires shorter test intervals and explicit testing procedures. The problem exists with all other Draft surveillance requirements in Section 4.5, "Safe Shutdown Cooling" as these also refer to Item 4.5.2.1a.

9. SR 5.3.9 - Safety Valves Surveillance

- a) This proposed surveillance would require verification of safety valve setpoints at five year intervals for the steam generator superheater, reheater and steam/water dump tank. The requirement is satisfactory provided 1) that a schedule for additional testing is developed for any valve in a system that fails to function on a regular test and 2) that an acceptable test procedure is developed or referenced. Conformance to the ASME Code (Subsection 1GV) for Class C valve testing would meet the above requirements and simplify the development of an acceptable technical specification requirement.

- b) The licensee proposed that all other Class I safety valves not covered by other surveillance requirements shall be setpoint tested at 10 year intervals. This is unacceptable. The licensee should conform with the ASME Code in this matter.

9U. Draft Item 4.5.2.1.b - Steam Generator

This Item provides for setpoint testing of superheater and reheater safety valves at five year intervals but does not identify a test procedure or provide guidance in the event of testing failures. Conformance with the ASME Code would resolve this problem.

Draft Item 4.7.1.2

This Item provides a similar requirement for the steam/water pump system safety valve setpoint. Again, conformance with the ASME Code would resolve this problem.

10. SR 5.4.4 - PCRV Cooling Water System Temperature Instrument Surveillance

- a) The proposed surveillance requirement clarifies the monthly monitoring of the PCRV cooling system water inlet temperature, individual tube water outlet temperatures, and the associated outlet temperature alarms. We find the proposed clarification acceptable.

- b) The proposed surveillance requirement clarifies requirements for annual calibration of the temperature monitoring scanner, the inlet and outlet header temperature indicators, and the outlet subheader temperature indicators. We find the proposed clarification acceptable.
- c) The proposed surveillance requirement would extend calibration of the inlet header and tube outlet thermocouples from an annual interval to a five year interval. We do not find this surveillance interval extension acceptable since no justification has been provided.

10U. Draft Item 3/4.6.3 - PCR/V Liner Cooling System Temperatures

No surveillance requirements comparable to SR 5.4.4 are given in this Draft Item. Consideration should be given to providing similar requirements in the upgraded technical specifications.

11. SR 5.4.5 - PCR/V Cooling Water System Flow Instruments Surveillance

The proposed surveillance would extend annual calibration of the flow scanner instruments and alarms and the six subheader flowmeters to the next scheduled plant shutdown if they were not calibrated during the previous year. We find this extension acceptable up to a surveillance interval not exceeding 18 months since the potentials for additional plant transients are reduced and since the LWR-STs, in general, specifies surveillance intervals not to exceed 18 months when utilizing intervals of shutdown or refueling.

11U. Draft Item 3/4.6.2 - PCRV Liner Cooling System

No surveillance requirements comparable to SR 5.4.5 are given. We believe that similar requirements should be considered in the upgraded technical specifications.

12. SR 5.5.3 - Reactor Building Exhaust System Surveillance

- e) The proposed surveillance requirement would verify at weekly intervals that the total pressure drop across the HEPA filter and charcoal absorber banks to be less than six inches of water at filter design flow \pm 10 percent. Subsequent to this proposal the Draft Upgrade Technical Specifications have been issued and it is our opinion that appropriate portions of Draft Item 4.6.5.2.c.3, "Reactor Building Exhaust System," which generally specifies the testing requirements given in the Standard Technical Specifications, should be utilized in lieu of PSC's proposal.
- f) The proposed surveillance requirement would verify annually the performance capability and mechanical condition of each exhaust fan or at the next scheduled shutdown if such verification was not performed during the previous year. We find this surveillance requirement acceptable provided that the surveillance interval does not exceed 18 months, since the LWR-STS, in general, specifies surveillance intervals not to exceed 18 months when utilizing intervals of shutdown or refueling.

- g) The proposed surveillance would require calibration of the instrumentation associated with the filters and fans at annual intervals or at the next scheduled shutdown if calibration was not performed during the previous year. We find these surveillance requirements are acceptable up to a surveillance interval not exceeding 18 months since the potentials for additional plant transients are reduced and since the LWR-STs, in general, specifies surveillance intervals not to exceed 18 months when utilizing intervals of shutdown or refueling.

12U. Draft Item 4.6.5.2 - Reactor Building Exhaust System

The surveillance requirements described herein are generally consistent with LWR Standard Technical Specifications. However, additional information should be provided addressing: (1) Why there is no provision for vibration monitoring of the fans and for calibration of the exhaust system instrumentation and (2) Why should not the surveillance frequency be at 720 hour intervals rather than semi-annually?

13. SR 5.7.2a - Fuel Storage Facility Surveillance

The proposed surveillance would require an annual functional test of the emergency ventilation system. This surveillance, together with parts a and b of SR 5.7.2c, have been substantially revised in Draft Item 4.9.3, "Fuel Storage Well." We believe action on this item should be deferred until discussions on comment 13U. below are completed.

13U. Draft Item 4.9.3 - Fuel Storage Well

The material in this Draft Item appears to represent an improved and better developed surveillance than that described in SR 5.7.2 and should be considered for inclusion in SR 5.7.2a.

REFERENCES

1. O. R. Lee (PSC) letter to J. T. Collins, "Proposed Technical Specification Changes - Inservice Inspection and Testing Requirements," No. P-83416, December 30, 1983.
2. Safety Evaluation by the Division of Reactor Licensing, U.S. Atomic Energy Commission in the Matter of Public Service Company of Colorado, Fort St. Vrain Nuclear Generating Station, Docket No. 50-267, January 30, 1972.
3. J. K. Fuller (PSC) letter to S. A. Varga, "Fort St. Vrain Inservice Inspection and Testing Program," No. P-79289, November 30, 1979.
4. P. C. Wagner (NRC) letter and enclosure to O. R. Lee (PSC), "Fort St. Vrain Nuclear Generating Station, Amendment No. 33 to Facility Operating License DPR-34," March 8, 1983.
5. O. R. Lee (PSC) letter to E. H. Johnson (NRC), "Technical Specification Upgrade Program," December 20, 1984.