

AUG 28 1985

Docket: 50-267

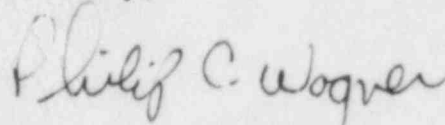
Public Service Company of Colorado  
ATTN: M. Holmes, Licensing Manager  
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Gentlemen:

As we discussed during the meeting on Technical Specifications (TSs) at the Fort St. Vrain Station on July 26, 1985, and during the telephone conference on August 13, 1985, it is our intention to include the review and approval of some of the applications for proposed changes to the TSs as part of the Upgrade Program. Attached as Enclosures 1 and 2 are the lists of applications which we intend to review as part of the Upgrade Program and those we intend to review separately. It is our present opinion that the applications included in Enclosure 1 are not completely acceptable and would require some modification; the comparable requirements in the Upgrade Program draft, however, appear to be more acceptable. Therefore, it appears that a more efficient use of your and our resources can be achieved by incorporating certain reviews into the Upgrade Program.

I would appreciate your review of the enclosures to ensure the accuracy and completeness of the pending applications and any comments you may have on our approach.

Sincerely,



Philip C. Wagner  
Senior Project Manager

Enclosures:  
As stated

cc:  
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PCWagner:gb  
8/20/85

ES *R26*  
REIreland  
8/26/85

RSB *DR*  
DRHunter  
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R. D. Martin, RA  
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E. Haycraft, DRSP/LA  
E. Butcher, ORB3  
G. Lainas, DL  
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ACTIONS TO BE INCLUDED IN THE TECHNICAL  
SPECIFICATION UPGRADE PROGRAM

1. Electrical Technical Specifications (TAC 51955)

- The original application (P-83415) dated 12/30/83, which was submitted in response to Safety Evaluations dated 8/17/82 and 10/12/82 related to degraded grid and onsite power systems undervoltage protection, was superseded by a rewrite of the electrical systems section of the TSs in response to a 10/12/83 enforcement conference commitment. The 6/26/84 (P-84187) reapplication did not contain all of the requested upgrades and was further revised by a 2/6/85 (P-85041) application. (This application also responds to Generic Letter 84-15 (TAC 55861) for diesel generator reliability.)
- Since the latest submittal is not completely acceptable and since recent NRC positions of diesel generator testing appear to be more acceptable to PSC, the needed revisions will be included in the Upgrade Program and no further action will be taken on the submitted applications.
- The recently completed modifications to the AC and DC electrical systems are being reviewed for acceptability as a separate issue.

2. NUREG-0737 Technical Specifications (TAC 54535)

- The application dated 7/31/84 (P-84242) was submitted in response to Generic Letters 83-36 and 37. Review of the Upgrade Program draft indicates that the requirements contained therein more closely follow the guidance contained in the Generic Letters than the proposed application. Therefore, inclusion of this review in the Upgrade Program seems to be appropriate.

3. Circulator Operability Requirements (TAC 56927)

- The application dated 2/6/85 (P-85042) would require numerous changes to be found acceptable. The requirements proposed in the Upgrade Program are being revised as a result of the meetings conducted from July 22 to 26, 1985. Therefore, efficiency would indicate that this application should be included in the Upgrade Program.

4. Restart Requirements

- The tendon wire surveillance requirements approved in the July 8, 1985 Safety Evaluation will be included in the Upgrade Program as committed to by PSC.
- The revised interim Control Rod Drive Mechanism and Reactivity Control Technical Specifications approved in Safety Evaluations dated July 12, 1985 and July 23, 1985, will be included in the Upgrade Program as committed to by PSC.

## ACTIONS BEING REVIEWED INDEPENDENTLY

## 1 Instrument Setpoints (TAC 47416)

- Problems discovered in the methods used to establish instrument setpoints resulted in a 10/1/80 applications which was discussed at a meeting in Denver on 10/27/83 during which PSC agreed to a resubmittal. The reapplication provided by letter dated 6/21/85 (P-85214) is being reviewed by NRR under TIA 83-15.
- The recent application contains some accident reanalyses which will require review in addition to the instrumentation review. Present plans call for completing our review in a time frame to allow incorporation into the Upgrade Program, however, due to the magnitude of this review effort, a contingency plan to use existing values in the Upgrade at the time of issuance should be developed.

## 2. L.C.O. 4.1.9 (TAC 52634)

- Following the discovery of nonconservative assumptions in establishing these power-to-flow requirements 10/11/83, PSC submitted an LER committing to follow conservative guidance and provide a corrected requirement. An application dated 12/15/83 (P-83403) was reviewed and determined to be unacceptable. Meeting between us, our consultant at ORNL and PSC (see summary dated 9/6/84) have not resulted in a revised application. ORNL guidance on 7/17/85 and PSC submittal 8/1/85 (P-85271) indicate progress is being made.
- This issue should be resolved in the near future with the result then included in the Upgrade Program. It may be appropriate for another meeting among all involved parties to reach final resolution prior to the commitment of including the new requirements in the 10/15/85 Upgrade submittal.

## 3. ISI/IST Requirements (TAC 53417)

- The 12/30/83 (P-83416) application was submitted in response to commitments to include appropriate requirements in the TSs. The preliminary results of our review were discussed during site meetings on July 22 to 26, 1985. The results of our review and the meeting discussions will be transmitted to PSC in the near future.
- We have determined that these inspection and testing requirements should not be delayed until completion of the Upgrade Program and we will review the resubmittal PSC committed to submit within 90 days of their receipt of our evaluation as a separate issue.

## 4. Circulator Overspeed Trip Setpoint (TAC 55052)

- The application dated 5/10/84 (P-84137) contained insufficient justification to allow a complete review. A response to the 10/25/84 questions was submitted by letter dated 12/27/84 (P-84537). A request for NRR review assistance was made by memo (Denise to Eisenhower) dated 1/28/85.



- Since this change will have little effect on the Upgrade Program, the review is being handled separately.

5. Organizational Changes (TAC 56743)

- The 1/14/85 (P-85009) application was determined to be obsolete prior to the expiration of the notice period and a revised set of requirements was submitted by application dated 6/10/85 (P-85155). The revised application, however, includes a reference to the Fuel Surveillance Program which was submitted by letter dated 5/3/85 (P-85151).
- Prior to the approval of the revised application, it will be necessary for NRC to accept the Fuel Surveillance Program as incorporating all of the past commitments and agreements on this subject. This review should be completed in the near future so the organizational changes can be approved and issued to reestablish compliance with the TS.

6. Xenon Stability Testing (TAC 57788)

- In order to complete the initial rise-to-power testing program item on xenon stability, it is necessary to allow a temporary change to the TS requirement on control rod position. A special test exception type change was proposed on 5/22/85 (P-85179).
- In order to allow completion of the test program during Cycle 4 (see P-85063 dated 3/5/85 for the PSC commitment to complete these tests) this change needs to be processed as a separate issue.