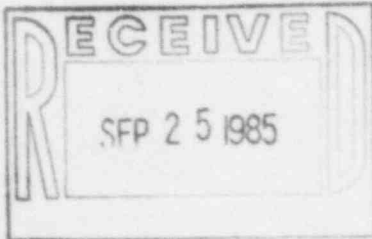




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16805 WCR 19 1/2, Platteville, Colorado 80651



September 23, 1985
Fort St. Vrain
Unit No. 1
P-85336

Regional Administrator
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Attn: Mr. R. D. Martin

Docket No. 50-267

SUBJECT: Independent Verification

REFERENCE: 1) G-85195, letter dated
May 22, 1985, Johnson
to Lee

2) P-85178, letter dated
May 22, 1985, Gahm to
Martin

3) G-84392, Assessment
Report, October 16,
1984, Denton to
Walker

Dear Mr. Martin:

By way of Reference 1, the Nuclear Regulatory Commission requested Public Service Company of Colorado to re-evaluate the Fort St. Vrain program for double verification of system or equipment status, particularly in connection with maintenance activities. Reference 2 (same date as Reference 1) provided an overview of the anticipated program for double verification to be undertaken as part of the Nuclear Performance Enhancement Program (NPEP) at Fort St. Vrain. We have completed our re-evaluation as requested. This letter provides the current status of our efforts.

Administrative Procedure P-1, Plant Operations, has been completely rewritten, approved and issued. With regards to the independent verification questions, Station Manager Administrative Procedure Six

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(SMAP-6), which supports APM P-1, requires the independent review and development of a safety evaluation for all setpoint changes. Additionally, changes to the Alarm Index which are affected by setpoint changes are independently verified.

A second procedure, SMAP-18, requires that the installation and removal of all temporary configurations are independently verified upon issuance and return.

Administrative Procedure P-2, Equipment Clearances and Operation Deviations, has been completely rewritten, approved, and issued. With regards to the independent verification question, supporting procedure SMAP-19 has been issued. This procedure requires that all equipment clearances and all Operations Deviations are independently verified upon issuance and return.

All of the above procedural controls are issued and in-place. These procedural controls address the vast majority of situations for which our re-evaluation has determined that independent verification is prudent. Two other areas for which we are in the process of incorporating independent verifications are the Results Procedures and system valve line-ups.

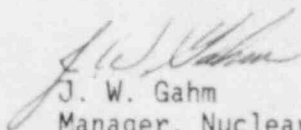
For the Results Procedures, which deal with calibration and maintenance of instruments, we have determined that additional controls beyond those required for equipment clearances are prudent. Consequently, administrative procedure RPA-01 has been developed and is being used as the basis for the independent verification for calibration and maintenance of instruments. The rewrite of the Results Procedures is addressing these requirements and will be completed in accordance with the NPEP.

For system valve line-ups, we have drafted the necessary forms to ensure a completely independent system line-up to be performed at the discretion of the Superintendent of Operations. As you are aware we are rewriting our System Operating Procedures per the NPEP's rule. Obviously, system valve line-ups are an integral part of this effort. Therefore, we intend to implement the valve line-up forms on an interim basis until formal issuance of the System Operating Procedures.

-3-

We believe that our re-evaluation of the independent verification issue has resulted in a comprehensive program. If you have any questions in this regard, please contact Mr. Mike Holmes at (303) 571-7511.

Sincerely,



J. W. Gahm
Manager, Nuclear Production
Fort St. Vrain Nuclear
Generating Station

JWG:CHF/djc