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Docket File

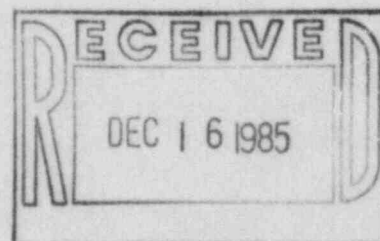
Public Service
Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

December 11, 1985
Fort St. Vrain
Unit No. 1
P-85466

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

ATTN: Mr. E. H. Johnson



Docket No. 50-267

SUBJECT: QA Procedure Review Program

- REFERENCES: 1) PSC Letter, Gahm to Collins,
dated May 1, 1984 (P-84127)
- 2) NRC Letter, Denton to Walker,
dated October 16, 1984 (G-84392)
- 3) PSC Letter, Lee to NRC Regional
Administrator, dated January 4,
1985 (P-85003)
- 4) NRC Letter, Martin to Lee, dated
January 17, 1985 (G-85024)
- 5) PSC Letter, Singleton to Johnson,
dated January 29, 1985 (P-85028)
- 6) NRC Letter, Butcher to Lee, dated
November 19, 1985 (G-85470)

Dear Mr. Johnson:

The purpose of this letter is to request that the NRC staff consider the elements of the QA Procedure Review Program as passive rather than active commitments.

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Two Public Service Company commitments to the NRC are involved in this program. One is to establish procedures for review and concurrence by QA of safety-related procedures and changes thereto. The other is to implement a QA review of the content and adequacy of Technical Specification Procedures.

In January, 1985, Public Service Company submitted a response to the NRC which clarified the phased implementation of the QA Procedure Review Program.

The response, which was submitted in Reference 5), P-85028, provided:

- background information associated with the program, and provided a basis from which the program was derived.
- the implementation status of the program, and included methodology used to integrate the two commitments.
- the timetable anticipated for completion of the procedure review process.

At the time, it was anticipated that QA would complete a review of all procedures--at least one time--by July 1, 1986. In addition, it was anticipated that QA would complete a review of the Technical Specification Surveillance Requirement (SR) Requirements, excluding the Environmental Surveillance Requirements (ESR's) by January 1, 1986.

This latter process was to begin in conjunction with the implementation phase of the SR Test Program which is a part of the Fort St. Vrain Technical Specification Upgrade Program.

As a result of the proposed schedule for completion of this Upgraded Program as contained in Reference 6), G-85470, the Quality Assurance Operations Department has reassessed the viability of anticipated completion dates of its two commitments to the Procedure Review Program.

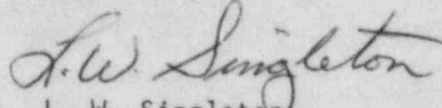
A major consideration in that reassessment was the motivation to be responsive to the intent of the NRC staff findings that prompted establishment of the Review Program. Another consideration was the recognition that any delays in beginning the SR Test Procedure review process would be undesirable. This consideration is reflected in the fact that the QA Operations Department began reviewing SR Test Procedures for content and adequacy in July, 1985.

Furthermore, approximately 1250 safety-related procedures, and 75 SR Test Procedures have been reviewed to date as part of the continuing process which constitutes the QA Procedure Review Program as defined in Reference 5), P-85028 and the attachments thereto.

For the reasons stated above, we believe that a transition of the Review Program commitments from an active (specific date for completion) to a passive (on-going) status is justified, and request your written concurrence with this proposal.

If you have any further questions in this matter, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,

A handwritten signature in cursive script that reads "L. W. Singleton".

L. W. Singleton
Manager, Quality Assurance Division
Fort St. Vrain Nuclear
Generating Station

LWS/MJF:kac