



Public Service

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December 24, 1985  
Fort St. Vrain  
Unit No. 1  
P-85491

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Mr. F. N. Berkow, Project Director  
Standardization and Special  
Projects Directorate

Docket No. 50-267

SUBJECT: Technical Specification  
Upgrade Program Schedule

- REFERENCE: 1) NRC Letter, Butcher  
to Lee, dated 11/19/85  
(G-85466)
- 2) NRC Letter, Martin to  
Lee, dated 7/19/85  
(G-85288)
- 3) PSC Letter, Lee to  
Berkow, dated 11/27/85  
(P-85448)

Dear Mr. Berkow:

This letter provides PSC comments on the proposed schedule for completion of the Fort St. Vrain (FSV) Technical Specification Upgrade Program, provided in Reference 1.

The following comments are based on receipt of the NRC mark-up of the Final Draft by January 30, 1986, as indicated in Reference 1. Any delays in receiving NRC comments will produce similar delays in the rest of the schedule.

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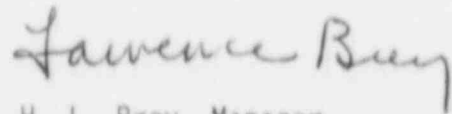
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AD - D. CRITCHFIELD (LTR ONLY)  
ED (W. JOHNSTON)  
RSH (THOMAS)  
ETCNR (PARR)  
FOR (W. HEGAN)

1. PSC considers that a TSRG reviewer visit on February 11-15, 1986, would not allow adequate time for PSC review of NRC comments. PSC proposes that this meeting be held February 24-28, 1986, at which time the list of action items will be defined.
2. In order to obtain comments from FSV operations personnel, PSC proposes that six weeks be allowed to resolve action items. Several two- or three- day meetings with the NRC should also be considered during this comment resolution period. PSC proposes that all action items and other major differences be resolved by April 11, 1986.
3. PSC considers that the requirement in Reference 2 to submit a license amendment within 90 days after NRC comments, represents the time required to resolve minor differences, and to obtain approvals of PSC's Plant Operating Review Committee (PORC) and Nuclear Facility Safety Committee (NFSC). Ninety days is not an adequate time period to resolve new problems or major differences. PSC considers that this 90 day period would begin April 11, and that an application to amend the Specifications would then be submitted by July 10, 1986.
4. PSC proposes that the NRC issue a license amendment by August 15, 1986.
5. As identified in Attachment 6 to Reference 3, PSC proposes that the upgraded Technical Specifications be implemented at the startup following the fourth refueling, to allow for training, procedure development, and data base revisions. The fourth refueling date for FSV is uncertain, but is currently planned for April 1, 1987.

PSC considers that the above schedule is consistent with the commitments identified in Reference 2. If you have any questions regarding the above comments, please contact Mr. M. H. Holmes, (303) 480-6960.

Very truly yours,

A handwritten signature in cursive script that reads "Lawrence Brey".

H. L. Brey, Manager  
Nuclear Licensing and Fuels Division

HLB/SWC/paw