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SUBJECT: Forwards application for amend to License DPR-34, changing TS to impose more restrictive leak test acceptance criteria for reactor bldg ventilation sys HEPA filters to permit use of graphite handling alternatives to minimize exposures.

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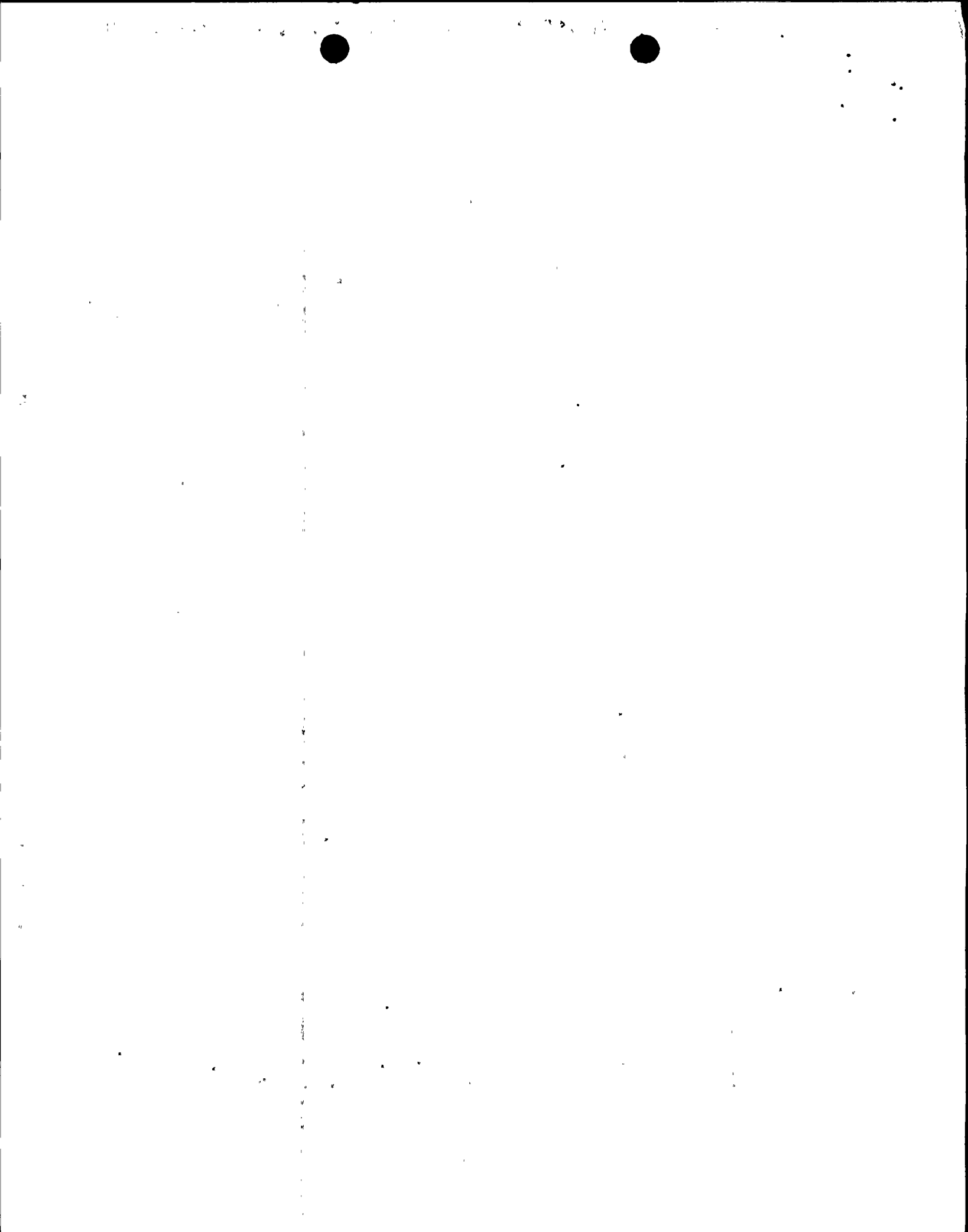
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May 18, 1993  
Fort St. Vrain  
Unit No. 1  
P-93046

**A. Clegg Crawford**  
Vice President  
Electric Production

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

ATTN: Mr. John H. Austin, Chief  
Decommissioning and Regulatory  
Issues Branch

Docket No. 50-267

**SUBJECT: Proposed Amendment to Decommissioning Technical Specifications**

Dear Mr. Austin:

This letter submits proposed changes to the Fort St. Vrain (FSV) Decommissioning Technical Specifications (DTS), to impose more restrictive leak test acceptance criteria for the Reactor Building ventilation system HEPA filters, and to extend the applicability of requirements for Reactor Building confinement integrity and ventilation system operability. Public Service Company of Colorado (PSC) is proposing these changes to permit use of graphite handling alternatives that would minimize occupational radiation exposures.

PSC and its decommissioning contractor are evaluating various packaging and multiple block handling schemes to determine the most efficient methods for disposing of graphite components that are removed from the FSV prestressed concrete reactor vessel (PCRv). Occupational radiation exposures can be minimized by packaging more than one graphite block in disposal liners, thus minimizing handling activities by workers. To support alternate packaging schemes, the heavy load drop analysis must take credit for 99 percent Reactor Building ventilation system HEPA filter efficiency, to ensure offsite dose consequences remain a small fraction of the EPA Protective Action Guidelines. However, the current DTS requirements for testing the HEPA filters are based on only 95 percent efficiency. PSC is proposing to revise SR 3.2.3 to reduce the acceptable HEPA leakage from less than 1 percent to less than 0.05 percent, consistent with use of a 99 percent HEPA efficiency in the accident analyses.

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The evaluation of alternate graphite packaging schemes has also been extended to the graphite core support blocks and core support posts, which were previously excluded from the DTS definition of Activated Graphite Blocks, and which therefore could be handled without Reactor Building confinement integrity or ventilation system operability. To account for various packaging possibilities and to account for the possibility that the core support blocks could be more activated than originally calculated in the Activation Analysis, PSC is proposing to expand the definition of Activated Graphite Blocks to include all activated graphite components that were inside the PCRV when there was irradiated fuel in the core. This will allow credit to be taken for Reactor Building confinement and ventilation filtration in the heavy load drop analyses for these graphite components, to demonstrate that the offsite dose consequences remain a small fraction of the EPA Protective Action Guidelines.

The proposed DTS changes described above are included in the following attachments:

- Attachment 1 - Summary of Proposed Changes
- Attachment 2 - Proposed Changes
- Attachment 3 - No Significant Hazards Consideration Evaluation

PSC has determined that the proposed changes included in this submittal involve No Significant Hazards Consideration, as described in 10 CFR 50.92. Further, PSC considers that approval of this proposed DTS amendment is consistent with PSC's efforts to keep worker radiation exposures As Low As is Reasonably Achievable (ALARA).

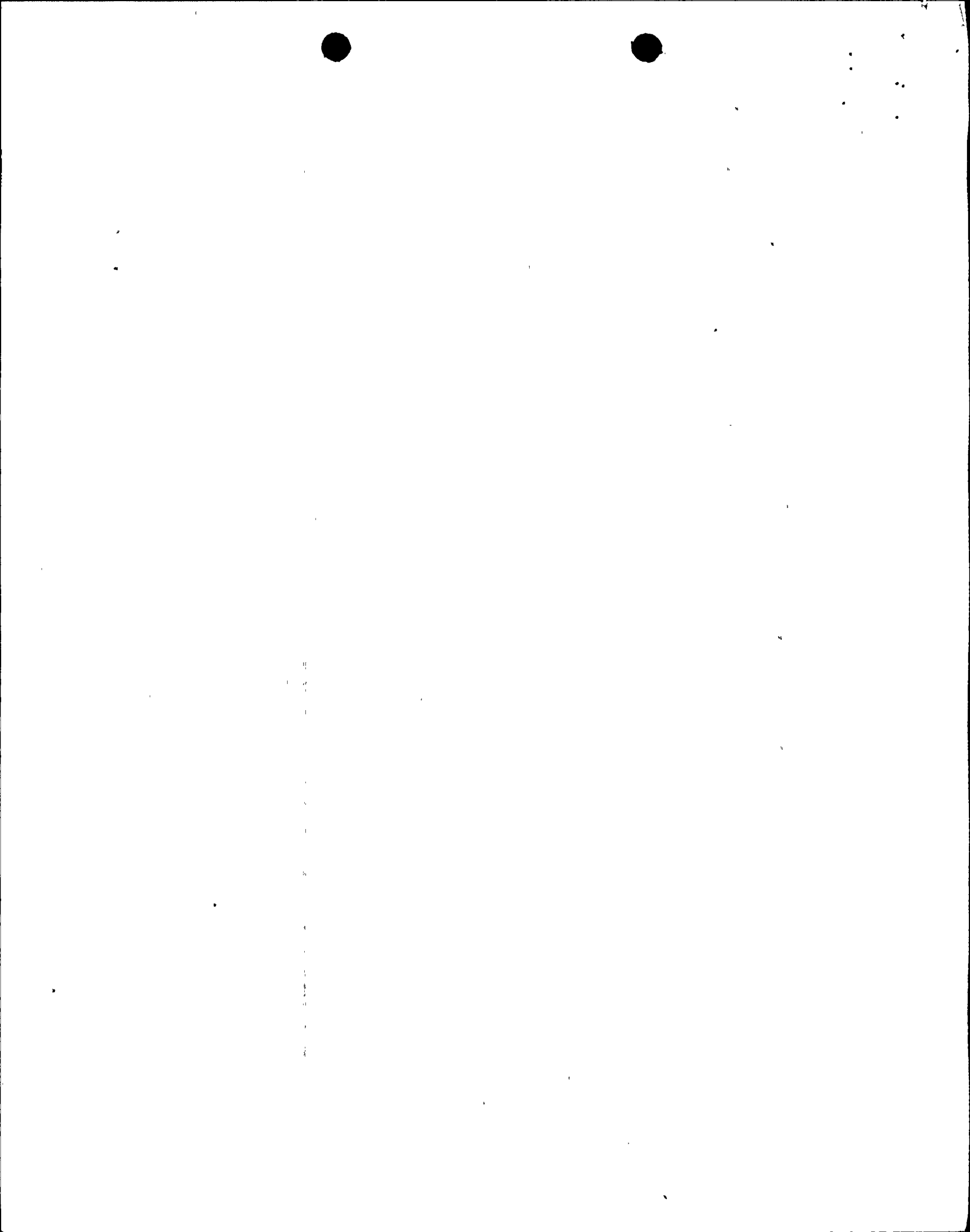
PSC requests NRC approval of the attached proposed Decommissioning Technical Specification amendment by August 15, 1993, to support scheduled graphite component disposal activities. If you have any questions concerning this submittal, please contact Mr. M. H. Holmes at (303) 620-1701.

Very truly yours,

*A. Clegg Crawford / by Dan Warrumbury*  
A. Clegg Crawford  
Vice President  
Electric Production

ACC/SWC

Attachments



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cc: w/attachment

Regional Administrator, Region IV

Mr. Ramon E. Hall, Director  
Uranium Recovery Field Office

Mr. Robert M. Quillin, Director  
Radiation Control Division  
Colorado Department of Health

