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Log # TXX-00021
File # 10010
916 (3.7)
Ref. # NUREG-1600

January 20, 2000

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
DOCKET NUMBER NO. 50-445
SUPPLEMENT TO ENFORCEMENT DISCRETION FOR
FEEDWATER ISOLATION VALVES (FIVS) AND ASSOCIATED
BYPASS VALVES

REF: TXU Electric letter TXX-00019 from C. L. Terry to U. S. Nuclear
Regulatory Commission, dated January 19, 2000

Gentlemen:

The following information supplements the enforcement discretion request for maintenance activities on feedwater isolation valve 1-03 (see referenced letter). This information is being provided based on a phone call between TXU Electric and the NRC on January 20, 2000.

1. An additional issue was discovered on January 19, 2000, concerning the discovery that unit specific loads were on common buses which may not be in conformance with the specific words in Reg. Guide 1.81, Revision 1, Regulatory Position C1. This event was conservatively reported to the NRC as a one hour report per 10 CFR Section 50.72 (b)(1) (ii)(B), outside design basis (see NRC Event Number 36604). TXU Electric has reviewed the details of this newly discovered potential nonconformance and has concluded that the issue is not related to the maintenance activity associated with Feedwater Isolation Valve (FIV) 1-03 and no additional compensatory actions are required for this new issue prior to commencing work on FIV 1-03.

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2. If significant problems are encountered while repairing FIV 1-03, CPSES will place this valve in an operable status or comply with the appropriate CPSES Technical Specification.
3. If the maintenance activity on FIV 1-03 takes longer than one shift to complete, the on-coming operations crew and maintenance personnel will be thoroughly briefed prior to assuming their respective duties in accordance with CPSES heightened level of awareness guidance.
4. No other risk significant activities will be in progress that affect Unit 1 while maintenance activities are in progress on FIV 1-03.

TXU Electric requests that the NRC grant the requested enforcement discretion to provide the additional time necessary to complete the required repairs and testing to FIV 1-03 if unexpected delays are encountered. If there is a significant change in the circumstances associated with this exercising of enforcement discretion, TXU Electric will notify the NRC.

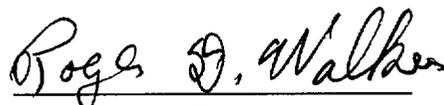
This communication contains no new licensing basis commitments regarding CPSES Unit 1.

Sincerely,



C. L. Terry

By:



Roger D. Walker
Regulatory Affairs Manager

JCH/jh

c - E. W. Merschoff, Region IV
D. H. Jaffe, NRR
J. I. Tapia, RIV
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