April 6, 1994

Docket Nos. 50-445
and 50-446

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Mr. William J. Cahill, Jr.
Group Vice President, Nuclear
TU Electric
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Dear Mr. Cahill:

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT NOS. 23 AND 9 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89 (TAC NOS. M86513 AND M86514)

The Commission has issued the enclosed Amendment Nos. 23 and 9 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications in response to your application dated May 21, 1993, and supplement dated February 23, 1994.

The amendments revise Technical Specification 3/4.7.7 and its associated Bases by replacing the requirements associated with the control room heating and ventilation (HVAC) system with requirements related to operation of the control room filtration system and control room air conditioning system. The changes are consistent with the requirements of the Westinghouse Standard Technical Specifications (NUREG-1431) issued on September 28, 1992.

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,
Original Signed By
Thomas A. Bergman, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 23 to NPF-87
2. Amendment No. 9 to NPF-89
3. Safety Evaluation

NRC FILE CENTER COPY

cc w/enclosures:
See next page

OFFICE	PDIV-2/LA	PDIV-2/PM	OGC	PDIV-2/D	OTSB #94-007
NAME	EPeyton	TBergman:ye		SBlack	CGrimes
DATE	3/10/94	3/9/94	3/17/94	3/14/94	3/14/94

FILENAME: B\M86513.AMD

OP-1

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PDR ADOCK 05000445
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Honorable Dale McPherson
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P. O. Box 851
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TEXAS UTILITIES ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1

DOCKET NO. 50-445

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 23
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated May 21, 1993, as supplemented by letter dated February 23, 1994, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-87 is hereby amended to read as follows:

   2. Technical Specifications and Environmental Protection Plan

      The Technical Specifications contained in Appendix A, as revised through Amendment No. 23, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance, to be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Suzanne C. Black

Suzanne C. Black, Director
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 6, 1994

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TEXAS UTILITIES ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 2

DOCKET NO. 50-446

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 9
License No. NPF-89

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated May 21, 1993, as supplemented by letter dated February 23, 1994, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-89 is hereby amended to read as follows:

   (2) Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 9, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TU Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance, to be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Suzanne C. Black, Director
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 6, 1994

ATTACHMENT TO LICENSE AMENDMENT NOS. 23 AND 9

FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89

DOCKET NOS. 50-445 AND 50-446

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE	INSERT
viii	viii
3/4 7-18	3/4 7-18
3/4 7-19	3/4 7-19
3/4 7-20	3/4 7-20
3/4 7-21	3/4 7-21
B 3/4 7-5	B 3/4 7-5
	B 3/4 7-5a

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

PLANT SYSTEMS

3/4.7.6 FLOOD PROTECTION

LIMITING CONDITION FOR OPERATION

3.7.6 Flood protection shall be provided for all safety-related systems, components, and structures when the water level of the Squaw Creek Reservoir (SCR) exceeds 777.5 feet Mean Sea Level, USGS datum.

APPLICABILITY: At all times.

ACTION: (Units 1 and 2)

With the water level of SCR above elevation 777.5 feet Mean Sea Level, USGS datum, initiate and complete within 2 hours, the flood protection measures verifying that any equipment which is to be opened or is opened for maintenance is isolated from the SCR by isolation valves, or stop gates, or is at an elevation above 790 feet.

SURVEILLANCE REQUIREMENTS

4.7.6 The water level of SCR shall be determined to be within the limits by:

a. Measurement at least once per 24 hours when the water level is below elevation 776 feet Mean Sea Level, USGS datum,

b. Measurement at least once per 2 hours when the water level is equal to or above elevation 776 feet Mean Sea Level, USGS datum, and

c. With the water level of SCR above 777.0 feet Mean Sea Level, USGS datum, verify flood protection measures are in effect by verifying once per 12 hours that flow paths from the SCR which are open for maintenance are isolated from the SCR by isolation valves, or stop gates, or are at an elevation above 790 feet.

PLANT SYSTEMS

3/4.7.7 CONTROL ROOM HVAC SYSTEM

CONTROL ROOM EMERGENCY FILTRATION/PRESSURIZATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.7.1 Two Control Room Emergency Filtration/Pressurization System trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, 6, and during movement of irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3, and 4:

With one Control Room Emergency Filtration/Pressurization System train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5, 6 and during movement of irradiated fuel assemblies:

a. With one Control Room Emergency Filtration/Pressurization System train inoperable, restore the inoperable train to OPERABLE status within 7 days or immediately place the OPERABLE Control Room Emergency Filtration/Pressurization System train in the emergency recirculation mode or immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.

b. With two Control Room Emergency Filtration/Pressurization System trains inoperable immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.

SURVEILLANCE REQUIREMENTS

4.7.7.1 Each Control Room Emergency Filtration/Pressurization System train shall be demonstrated OPERABLE:

a. At least once per 31 days by operating each Control Room Emergency Filtration/Pressurization System train for $\geq$ 10 continuous hours with the heaters operating.

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

SURVEILLANCE REQUIREMENTS (Continued)

(1) Verifying that the filtration unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% by using the test procedure guidance in Regulatory Position C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978*, and the emergency filtration unit flow rate is 8000 cfm ± 10%, and the emergency pressurization unit flow rate is 800 cfm ± 10%;

(2) Verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.2%; and

(3) Verifying an emergency filtration unit flow rate of 8000 cfm ± 10% and an emergency pressurization unit flow rate of 800 cfm ± 10% during system operation when tested in accordance with ANSI N510-1980.

c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.2%;

d. At least once per 18 months by:

(1) Verifying that the total pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8.0 inches water gauge while operating the emergency filtration unit at a flow rate of 8000 cfm ± 10%, and is less than 9.5 inches water gauge while operating the emergency pressurization unit at a flow rate of 800 cfm ± 10%; and

(2) Verifying that the heaters in the emergency pressurization units dissipate 10 ± 1 kW when tested in accordance with ANSI N510-1980;

*ANSI N510-1980 and ANSI N509-1980 shall be used in place of ANSI N510-1975 and ANSI N509-1976, respectively.

SURVEILLANCE REQUIREMENTS (Continued)

e. After each complete or partial replacement of a HEPA filter bank in the emergency filtration unit(s), by verifying that the unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the unit at a flow rate of 8000 cfm ± 10%;

f. After each complete or partial replacement of a charcoal adsorber bank in the emergency filtration unit(s), by verifying that the unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the unit at a flow rate of 8000 cfm ± 10%;

g. After each complete or partial replacement of a HEPA filter bank in the emergency pressurization unit(s), by verifying that the unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the unit at a flow rate of 800 cfm ± 10%.

h. After each complete or partial replacement of a charcoal adsorber bank in the emergency pressurization unit(s), by verifying that the unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the unit at a flow rate of 800 cfm ± 10%;

i. At least once per 18 months by verifying that each Control Room Emergency Filtration/Pressurization System train actuates on an actual or simulated Safety Injection, Loss-of-Offsite Power, or Intake Vent-High Radiation Signal; and

j. At least once per 18 months by verifying that each Control Room Emergency Filtration/Pressurization System train can maintain a positive pressure of $\geq$ 0.125 inches water gauge, relative to the adjacent areas during the pressurization mode of operation at a makeup flow rate of $\leq$ 800 cfm.

PLANT SYSTEMS

CONTROL ROOM HVAC SYSTEM

CONTROL ROOM AIR CONDITIONING SYSTEM (CRACS)

LIMITING CONDITION FOR OPERATION

3.7.7.2 Two CRACS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, 6, and during movement of irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3 and 4:

a. With one CRACS train inoperable, restore the inoperable train to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With two CRACS trains inoperable and at least 100% of the required heat removal capability equivalent to a single OPERABLE CRACS train available, restore the inoperable trains to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5, 6 and during movement of irradiated fuel assemblies:

a. With one CRACS train inoperable, restore the inoperable train to OPERABLE status within 30 days or immediately place the OPERABLE CRACS train in operation or immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.

b. With two CRACS trains inoperable and at least 100% of the required heat removal capability equivalent to a single OPERABLE CRACS train available, restore the inoperable trains to OPERABLE status within 30 days or immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.

c. With two CRACS trains inoperable and with b. above not applicable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.

SURVEILLANCE REQUIREMENTS

4.7.7.2 At least once per 18 months verify each CRACS train has the capability to remove the assumed head load.

3/4.7.8 PRIMARY PLANT VENTILATION SYSTEM - ESF FILTRATION UNITS

LIMITING CONDITION FOR OPERATION

3.7.8 Two independent ESF Filtration Trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With one ESF Filtration Train inoperable, restore the inoperable ESF Filtration Train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With the inability to reach and maintain a negative pressure in the negative pressure envelope of the Auxiliary, Safeguards, and Fuel Buildings greater than or equal to 0.05 inch water gauge, restore the PRIMARY PLANT VENTILATION SYSTEM to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

c. With the inability to reach and maintain a negative pressure in the negative pressure envelope of the Auxiliary, Safeguards, and Fuel Buildings greater than or equal to 0.01 inch water gauge, restore the PRIMARY PLANT VENTILATION SYSTEM'S ability to maintain a negative pressure of greater than or equal to 0.01 inch water gauge within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.8 Each ESF Filtration Train shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that each ESF Filtration Train operates for at least 10 continuous hours with the heaters operating;

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

   1) Verifying that each ESF Filtration Unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 1.0% by using the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52,

3/4.7.5 ULTIMATE HEAT SINK

The limitations on the ultimate heat sink level and temperature ensure that sufficient cooling capacity is available to either: (1) provide normal cooldown of the facility or (2) mitigate the effects of accident conditions within acceptable limits.

The limitations on minimum water level is based on providing a 30-day cooling water supply to safety-related equipment without exceeding its design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants," Rev. 2 (January 1976). The limitation on maximum temperature is based on the maximum allowable component temperatures in the Service Water and Component Cooling Water Systems, and the requirements for cooldown. The limitation on average sediment depth is based on the possible excessive sediment buildup in the service water intake channel.

3/4.7.6 FLOOD PROTECTION

The limitation of flood protection ensures that facility protective actions will be taken in the event of flood conditions. The only credible flood condition that endangers safety related equipment is from water entry into the turbine building via the circulating water system from Squaw Creek Reservoir and then only if the level is above 778 feet Mean Sea Level. This corresponds to the elevation at which water could enter the electrical and control building endangering the safety chilled water system. The surveillance requirements are designed to implement level monitoring of Squaw Creek Reservoir should it reach an abnormally high level above 776 feet. The Limiting Condition for Operation is designed to implement flood protection, by ensuring no open flow path via the Circulating Water System exists, prior to reaching the postulated flood level.

3/4.7.7 CONTROL ROOM HVAC SYSTEM

The control room emergency filtration/pressurization system consists of two independent, redundant trains that recirculate and filter the control room air, and two independent, redundant trains that pressurize the control room.

The OPERABILITY of the Control Room HVAC System ensures that: (1) the control room ambient air temperature does not exceed the allowable temperature per 3/4.7.10 for continuous-duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable including temperature for operations personnel during and following all credible accident conditions.

A Control Room Air Conditioning System (CRACS) consists of two independent and redundant trains that provide cooling and heating of recirculated control room air. Each Control Room Air Conditioning (CRAC) train includes two heating and cooling units, instrumentation, and controls to provide for control room temperature control. Each cooling unit provides 50% of the heat removal capability for its respective train.

A CRAC train is inoperable if it is not capable of removing the required heat load for plant conditions. The required heat load includes normal and post-accident conditions. The actual heat load and the heat removal

3/4.7.7 CONTROL ROOM HVAC SYSTEM (Continued)

capability needed to adequately cool the control room is dependent upon factors such as outdoor air temperature and safe shutdown impoundment water temperature. OPERABILITY determinations are based upon design basis conditions unless a specific evaluation has been performed which identifies the required heat load for actual conditions. Individual components are inoperable if they are not capable of performing their safety functions.

Due to the redundancy of trains, the diversity of components, and the annual variations in outdoor conditions, the inoperability of one component in a train or two components in different trains does not necessarily result in a loss of safety function for the CRACS. The intent of this condition is to maintain a combination of equipment such that 100% of the required heat removal capability of a single OPERABLE CRAC train remains available.

With one or more CRAC trains inoperable and at least 100% of the required heat removal capability equivalent to a single OPERABLE CRAC train available, the inoperable trains must be returned to OPERABLE status within 30 days. This Allowed Outage Time is based on the low probability of complete loss of cooling due to the redundancy of the support systems (electrical and cooling water), the capability of the OPERABLE train/components to provide the required cooling, the potential that plant staff actions can restore or mitigate the effects of component failures, and the time available to respond as loss of cooling does not have an immediate, irreversible impact.

While in MODES 5, 6 or during movement of irradiated fuel assemblies, if both trains cannot be restored to OPERABLE status within 30 days, an OPERABLE train (A or B) must be placed in operation immediately; otherwise, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.

Operation of the system with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rems or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of 10 CFR 50 Appendix A. ANSI N510-1980 and ANSI N509-1980 will be used as a procedural guide for surveillance testing.

BASES

3/4.7.8 PRIMARY PLANT VENTILATION SYSTEM - ESF FILTRATION UNITS

The OPERABILITY of the ESF Filtration Units ensures that radioactive materials leaking from the ECCS equipment within the safeguards and auxiliary buildings following a LOCA are filtered prior to reaching the environment. These filtration units also ensure that radioactive materials leakage from within the fuel building are filtered prior to reaching the environment. Operation of the ESF filtration units with the heaters operating to maintain low humidity using automatic control for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The operation of the ESF filtration units and the resultant effect on offsite dosage calculations was assumed in the safety analyses. ANSI N510-1980 and ANSI N509-1980 will be used as a procedural guide for surveillance testing.

The negative pressure envelope of the Auxiliary, Safeguards and Fuel Buildings is the portions of these buildings which is exhausted post accident to ensure that potential ECCS leakage is filtered.

3/4.7.9 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with 10 CFR 50.71(c). The accessibility of each snubber shall be determined and approved by the Station Operation Review Committee (SORC). The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with 10 CFR 50.59.

Surveillance to demonstrate OPERABILITY is by performance of the requirements of an approved inservice inspection program.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 23 AND 9 TO

FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89

TEXAS UTILITIES ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated May 21, 1993, Texas Utilities Electric Company (the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License Nos. NPF-87 and NPF-89) for the Comanche Peak Steam Electric Station, Unit Nos. 1 and 2 (CPSES). The proposed changes would revise Technical Specification (TS) 3/4.7.7 and its associated Bases by replacing the requirements associated with the control room heating and ventilation (HVAC) system with requirements related to the control room emergency filtration/pressurization system (CREFS) and control room air conditioning system (CRACS). The proposed changes are consistent with the requirements of the improved Westinghouse Standard Technical Specifications (STS) (NUREG-1431) issued on September 28, 1992.

The control room HVAC system at CPSES is the control room air conditioning and emergency filtration/pressurization system which is shared by Units 1 and 2. The system is required to be operable during all modes of operation. The current limiting condition for operation (LCO) allowed outage time unduly restricts the ability to perform scheduled preventive maintenance and normally occurring corrective maintenance. This restriction could result in the simultaneous shutdown of both units due to the loss of one-out-of-four air conditioning units.

In the present TS 3/4.7.7, the requirements for the control room HVAC system are divided into two specifications based on the units' operating MODE. In MODES 1, 2, 3, and 4, TS 3/4.7.7.1 applies; for MODES 5 and 6, TS 3/4.7.7.2 applies.

The proposed changes will separate the requirements into two specifications based on system function. TS 3/4.7.7.1 will address the filtration/ pressurization aspects of the control room HVAC system and TS 3/4.7.7.2 will address air conditioning. In addition to the six operating MODES in the present TS, the revised TS will also include an applicability statement for the movement of irradiated fuel assemblies.

In the proposed revision, a new specification for the CRACS is provided and the existing specifications are essentially transferred to the CREFS except for some minor changes to be consistent with NUREG-1431.

The additional information contained in the supplemental letter dated February 23, 1994, was clarifying in nature and, thus, within the scope of the initial Federal Register notice and did not affect the staff's proposed no significant hazards consideration determination.

2.0 EVALUATION

The action statement for the emergency filtration/pressurization functions while in MODES 1, 2, 3, and 4 remains unchanged in the proposed revision. For the heating and cooling functions, the existing action statement is changed from an allowed outage time (AOT) of 7 days to an AOT of 30 days, and a new plant specific action statement is added. The new action statement provides the requirements and AOT (30 days) when each train is capable of 50 percent of its capacity, but neither is capable of providing 100 percent of the required heating and cooling. The 30 days is acceptable because it takes into account the fact that following a loss of the CRACS, temperature changes are gradual, dependent upon outside temperature, and time is available for manual actions that can alleviate the loss of CRACS. Therefore, the AOT should be longer than the AOT for the CREFS since, unlike the loss of CRACS, there are no actions that can be taken to effectively alleviate the conditions resulting from a loss of all filtration/pressurization capability following a loss-of-coolant accident (LOCA). The 30-day AOT is also consistent with the Westinghouse STS (NUREG-1431). These times are also acceptable for the plant specific design feature (each train consists of two 50 percent capacity air handling units) because under these conditions the system is less susceptible to a single failure (50 percent is always available) and the same manual actions are available to compensate for a complete loss of CRACS.

The action requirement for the CREFS while in MODES 5 and 6 with one train inoperable has been changed to add a new alternative action which may be taken following the AOT. The new alternative action is to suspend core alterations and the movement of spent fuel assemblies. This is an acceptable alternative because the function of the CREFS during these modes is to protect against a fuel handling accident. For two CREFS trains inoperable, the action requirement has also been changed to suspend core alterations and the movement of irradiated fuel assemblies. The previous action requirement was to suspend all operations involving core alterations or positive reactivity changes and included a requirement that this action was also to be taken in the event that the only operable HVAC train could not be powered by an operable emergency power supply. The deletion of the requirement to suspend the handling of irradiated fuel assemblies (suspension of core alterations already exists) effectively addresses this concern. The CREFS is not related to the capability to prevent or mitigate a criticality accident due to positive reactivity addition. Separate controls are provided to address positive reactivity changes and the prevention of criticality. It is also acceptable that the operability of the CREFS not be tied to the capability of its being

powered by an onsite emergency power supply. Action requirements already exist in the specifications to address an inoperable emergency diesel generator and a loss of offsite power is not likely to initiate a fuel handling accident and vice versa.

The action requirements for the CRACS while in MODES 5 and 6 with one train inoperable (or each train only capable of 50 percent) has an AOT of 30 days and following the AOT, an alternative action to suspend core alterations and the movement of irradiated fuel assemblies has been added. This same alternative action is required when both trains of CRACS are inoperable. These changes are acceptable for the same reasons identified previously for the CRACS in MODES 1 through 4 and for the CREFS in MODES 5 and 6. These changes are also consistent with NUREG-1431.

The existing surveillance requirements for the CREFS filters have been brought forward in lieu of a statement that the filters will be tested in accordance with the ventilation filter testing program as specified in NUREG-1431. Some minor changes to the rest of the surveillance requirements have also been made to make them consistent with NUREG-1431. A surveillance requirement has also been added for functional testing of the CRACS. The staff has reviewed the proposed surveillance requirements and conclude they are acceptable because the frequency and methods of testing are similar to other safety-related systems and are consistent with the requirements in NUREG-1431.

The proposed changes include all related requirements of NUREG-1431, Rev. 0. The staff has concluded that this proposed change satisfies the requirements of the Commission's Final Policy Statement on Technical Specification Improvement (58 FR 39132). The staff is considering this change as a potential line-item improvement of the Standard Technical Specifications.

Based on its evaluation as described above, the staff concludes that the proposed technical specification change to divide the requirements for the control room HVAC into two specifications based on system rather than operating modes provides more flexibility and adds a level of safety with the addition of a surveillance requirement for the heating and cooling function of the system. The existing TS has no requirement for testing the heating and air conditioning function. The staff, therefore concludes that the proposed changes to TS 3/4.7.7 are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (5 FR 43933). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the consideration discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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