

March 3, 1995

Mr. C. Lance Terry
Group Vice President, Nuclear
TU Electric
Energy Plaza
1601 Bryan Street, 12th Floor
Dallas, Texas 75201-3411

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT
NOS. 35 AND 21 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
(TAC NOS. M90872 AND M90873)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 35 and 21 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 (TS) in response to your application dated November 18, 1994.

These amendments change TS Surveillance Requirements 4.8.1.1.2a and 4.8.1.2 frequency to at least once per 31 days. The amendments also delete the accelerated testing schedule in Table 4.8-1 and the special reporting requirements in Surveillance Requirement 4.8.1.1.3. The associated BASES section is revised to add Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," May 31, 1994, as a reference and to delete the paragraph discussing the diesel generator test schedule in Table 4.8-1. These changes are based on Generic Letter 94-01.

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

Timothy J. Polich, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

9503090063 950303
PDR ADOCK 05000445
P PDR

Docket Nos. 50-445
and 50-446

- Enclosures: 1. Amendment No. 35 to NPF-87
2. Amendment No. 21 to NPF-89
3. Safety Evaluation

cc w/encls: See next page

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Document Name: CP90952.AMD

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COPY	YES/NO	YES/NO	YES/NO	YES/NO

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March 3, 1995

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Group Vice President, Nuclear
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These amendments change TS Surveillance Requirements 4.8.1.1.2a and 4.8.1.2 frequency to at least once per 31 days. The amendments also delete the accelerated testing schedule in Table 4.8-1 and the special reporting requirements in Surveillance Requirement 4.8.1.1.3. The associated BASES section is revised to add Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," May 31, 1994, as a reference and to delete the paragraph discussing the diesel generator test schedule in Table 4.8-1. These changes are based on Generic Letter 94-01.

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Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-445
and 50-446

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COPY	YES/NO	YES/NO	YES/NO	YES/NO

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 3, 1995

Mr. C. Lance Terry
Group Vice President, Nuclear
TU Electric
Energy Plaza
1601 Bryan Street, 12th Floor
Dallas, Texas 75201-3411

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT
NOS. 35 AND 21 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
(TAC NOS. M90952 AND M90953)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 35 and 21 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 (TS) in response to your application dated November 18, 1994.

These amendments change TS Surveillance Requirements 4.8.1.1.2a and 4.8.1.2 frequency to at least once per 31 days. The amendments also delete the accelerated testing schedule in Table 4.8-1 and the special reporting requirements in Surveillance Requirement 4.8.1.1.3. The associated BASES section is revised to add Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," May 31, 1994, as a reference and to delete the paragraph discussing the diesel generator test schedule in Table 4.8-1. These changes are based on Generic Letter 94-01.

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,

A handwritten signature in cursive script, appearing to read "Timothy J. Polich".

Timothy J. Polich, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-445
and 50-446

Enclosures: 1. Amendment No. 35 to NPF-87
2. Amendment No. 21 to NPF-89
3. Safety Evaluation

cc w/encls: See next page

Mr. C. Lance Terry
TU Electric Company

Comanche Peak, Units 1 and 2

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

TEXAS UTILITIES ELECTRIC COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1
DOCKET NO. 50-445
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 35
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 November 18, 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:

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PDR ADOCK 05000445
P PDR

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 35, 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 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy J. Polich, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: March 3, 1995



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

TEXAS UTILITIES ELECTRIC COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 2
DOCKET NO. 50-446
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 21
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 November 18, 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. 21, 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 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy J. Polich, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: March 3, 1995

ATTACHMENT TO LICENSE AMENDMENT NOS. 35 AND 21
FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
DOCKET NOS. 50-445 AND 50-446

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

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3/4 8-8
3/4 8-9
3/4 8-10
B 3/4 8-2

INSERT

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3/4 8-3
3/4 8-8
3/4 8-9
3/4 8-10
B 3/4 8-2

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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- f. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1a. within 1 hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the Onsite Class 1E Distribution System shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) the 6.9 kV safeguards bus power supply from the preferred offsite source to the alternate offsite source.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
- 1) Verifying the fuel level in the day fuel tank,
 - 2) Verifying the fuel level in the fuel storage tank,
 - 3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day fuel tank,
 - 4) Verifying the diesel starts from ambient condition and accelerates to at least 441 rpm in less than or equal to 10 seconds.*#

*All planned diesel engine starts for the purpose of this surveillance may be preceded by a prelube period in accordance with vendor recommendations.

#The diesel generator start time (10 seconds) shall be verified at least once per 184 days. All other engine starts for performance of this surveillance, may use a diesel generator start involving gradual acceleration to synchronous speed as recommended by the manufacturer.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The generator voltage and frequency shall be 6900 ± 690 volts and 60 ± 1.2 Hz within 10 seconds after the start signal**. The diesel generator shall be started for this test by using one of the following signals:

- a) Manual, or
 - b) Simulated safeguards bus undervoltage, or
 - c) Safety Injection Actuation test signal in conjunction with loss of offsite power, or
 - d) Safety Injection Actuation test signal by itself.
- 5) Verifying the generator is synchronized, loaded to between 6,300 and 7,000 kW** and operates at this load condition for at least 60 minutes, and
 - 6) Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tank;
 - c. At least once per 31 days by checking for and removing accumulated water from the fuel oil storage tanks;
 - d. By sampling new fuel oil in accordance with ASTM-D4057-1981 prior to addition to storage tanks and:
 - 1) By verifying in accordance with the tests specified in ASTM-D975-1981 prior to addition to the storage tanks that the sample has:

*Diesel generator loading for the purpose of this surveillance may be accomplished in accordance with vendor recommendations; i.e., >110 seconds.

**During performance of surveillance activities as a requirement for ACTION statements, the air-roll test shall not be performed.

#This band is meant as guidance to avoid routine overloading of diesel generator. Momentary load excursions outside this band due to changing bus loads shall not invalidate the test.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

shall be loaded to an indicated 6900 - 7700 kW[#] and during the remaining 22 hours of this test, the diesel generator shall be loaded to an indicated 6300 - 7000 kW[#]. The generator voltage and frequency shall be 6900 ± 690 volts and 60 ± 1.2 Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2f.4)b);*

- 8) Verifying that the auto-connected loads to each diesel generator do not exceed the continuous rating of 7,000 kW;
- 9) Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
- 10) Verifying that with the diesel generator operating in a test mode, connected to its bus, a simulated Safety Injection signal overrides the test mode by: (1) returning the diesel generator to standby operation, and (2) automatically energizing the emergency loads with offsite power;
- 11) Verifying that the fuel transfer pump transfers fuel from fuel storage tank to the day tank of its associated diesel via the installed lines;
- 12) Verifying that the automatic load sequence timers are OPERABLE with the interval between each load block within ± 10% of its design interval;
- 13) Verifying that the following diesel generator lockout features prevent diesel generator starting:

[#]This band is meant as guidance to avoid routine overloading of the diesel generator. Momentary load excursions outside this band due to changing bus loads shall not invalidate the test.

*If Specification 4.8.1.1.2f.4)b) is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated between 6300 - 7000 kW for 1 hour or until operating temperature has stabilized before repeating 4.8.1.1.2f.4)b).

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- a) Barring device engaged, or
- b) Maintenance Lockout Mode.
- g. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting both diesel generators simultaneously,* during shutdown, and verifying that both diesel generators accelerate to at least 441 rpm (58.8 Hz) in less than or equal to 10 seconds; and
- h. At least once per 10 years by:
 - 1) Pumping out each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution or equivalent, and
 - 2) Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code, when tested pursuant to Specification 4.0.5.

*All planned diesel engine starts for the purpose of this surveillance may be preceded by a prelube period in accordance with vendor recommendations.

TABLE 4.8-1

NOT USED

ELECTRICAL POWER SYSTEMS

A.C. SOURCES

SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. One circuit between the offsite transmission network and the Onsite Class 1E Distribution System, and
- b. One diesel generator with:
 - 1) Day fuel tank containing a minimum volume of 1440 gallons of fuel,
 - 2) A fuel storage system containing a minimum volume of 86,000 gallons of fuel, and
 - 3) A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above minimum required A.C. electrical power sources OPERABLE, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, movement of irradiated fuel, or crane operation with loads over the fuel storage pool, and within 8 hours, depressurize and vent the Reactor Coolant System through a greater than or equal to 2.98 square inch vent. In addition, when in MODE 5 with the reactor coolant loops not filled, or in MODE 6 with the water level less than 23 feet above the reactor vessel flange, immediately initiate corrective action to restore the required sources to OPERABLE status as soon as possible.

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the requirements of Specifications 4.8.1.1.1 and 4.8.1.1.2* (except for Specification 4.8.1.1.2a.5).

*The 18 month surveillance test interval is extended to 24 months for Train A, Unit 2, to remain in effect until the completion of the second refueling outage for Unit 2.

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criterion 17 of 10 CFR 50 Appendix A.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss-of-offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974 and Generic Letter 84-15, "Proposed Staff Position to Improve and Maintain Diesel Generator Reliability." When one diesel generator is inoperable, there is an additional ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generator as a source of emergency power, are also OPERABLE, and that the steam-driven auxiliary feedwater pump is OPERABLE. This requirement is intended to provide assurance that a loss-of-offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term, verify, as used in this context means to administratively check by examining logs or other information to determine if certain components are out-of-service for maintenance or other reasons. It does not mean to perform the Surveillance Requirements needed to demonstrate the OPERABILITY of the component.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that: (1) the facility can be maintained in the shutdown or refueling condition for extended time periods, and (2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The OPERABILITY of the day fuel tank and Fuel Storage System are based on the following: (1) the minimum day fuel tank volume ensures sufficient fuel immediately available to operate the diesel generator at the continuous rating for 60 minutes plus 10 percent, and (2) the remaining day fuel tank volume (between that required for (1) above and the volume specified in the Limiting Conditions for Operation), combined with the minimum specified Fuel Storage System volume, ensures sufficient onsite fuel oil storage capacity to operate the diesel generator at the continuous rating for seven days.

ELECTRICAL POWER SYSTEMS

BASES

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION (Continued)

The Fuel Storage System consists of the fuel oil storage tank and is equivalent to the ANSI N195-1976 definition for supply tank.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971; 1.108, "Periodic Testing Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977; and 1.137, "Fuel-Oil Systems for Standby Diesel Generators," January 1978, Generic Letter 84-15, Generic Letter 83-26, "Clarification of Surveillance Requirements for Diesel Fuel Impurity Level Tests," and Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators."

The Surveillance Requirement for demonstrating the OPERABILITY of the station batteries are based on the recommendations of Regulatory Guide 1.129, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," Revision 1, February 1978, Regulatory Guide 1.32, "Criteria for Safety Related Electric Power Systems for Nuclear Power Plants," Revision 2, February 1977, and IEEE STD 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

The operational requirement to energize the instrument busses from their associated inverters connected to its associated D.C. bus is satisfied only when the inverter's output is from the regulated portion of the inverter and not from the unregulated bypass source via the internal static switch.

Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage on float charge, connection resistance values, and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates, and compares the battery capacity at that time with the rated capacity.

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage, and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and 0.015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, is characteristic of a charged cell with adequate capacity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than 0.020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than 0.010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 35 AND 21 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 November 18, 1994, (TXX-94310) Texas Utilities Electric Company (TU Electric/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 (CPSES), Units 1 and 2. The proposed changes would modify CPSES Technical Specification (TS) Surveillance Requirement 4.8.1.1.2a and 4.8.1.2 frequency to at least once per 31 days. The amendments also delete the accelerated testing schedule in Table 4.8-1 and the special reporting requirements in Surveillance Requirement 4.8.1.1.3. The associated BASES section is revised to add Generic Letter 94-01 as a reference and to delete the paragraph discussing the diesel generator test schedule in Table 4.8-1. The NRC provided guidance on the proposed TS changes in Generic Letter (GL) 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," dated May 31, 1994.

2.0 BACKGROUND

The CPSES design employs emergency diesel generators (EDGs) to provide onsite AC power in the event that offsite AC power is not available. The EDGs are required to be tested on a periodic basis (normally monthly) to provide an ongoing demonstration of performance and reliability. In accordance with technical specifications, EDG failures are reported to the NRC in special reports, and when certain values for the number of failures per number of valid tests (as defined by Regulatory Position C.2.e of Regulatory Guide 1.108, Revision 1, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants") are exceeded, the frequency of testing is accelerated to weekly.

The NRC generic safety evaluation for TDI Diesel Generators, dated March 17, 1994, included as part of Generic Topical Report TDI-EDG-001-A, "Basis for Modification to Inspection Requirements for Transamerica Delaval, Inc., Emergency Diesel Generators," April 28, 1994, concluded that deletion of accelerated testing along with the addition of slow starting the EDGs

decreases the wear and tear of the engines and increases the reliability and availability by reducing the outage time during refueling. The data from engines in nuclear service which have implemented the slow-start option support these conclusions. The technical specification change covering the slow start of the EDGs was submitted to the NRC by letter dated April 25, 1994, (TXX-94118) and was approved by License Amendment Nos. 29 and 15 to Facility Operating License Nos. NPF-87 and NPF-89 for the CPSES Units 1 and 2, dated October 6, 1994.

While the special reporting and accelerated testing program prescribed by technical specifications addresses EDG performance and reliability, implementation of the provisions of the maintenance rule for EDGs, including the applicable regulatory guidance, is an alternative program that provides desired flexibility, while maintaining necessary assurance of EDG reliability and availability. In GL 94-01, the NRC concluded that such a program is an acceptable alternative. Changes to the special reporting and accelerated testing program were not included in NUREG-1431, "Standard Technical Specifications Westinghouse Plants", Revision 0, September 28, 1992, which was issued prior to GL 94-01.

3.0 EVALUATION

The surveillance interval for testing of EDGs is currently governed by TS Table 4.8-1, which gives a diesel generator test schedule based on the number of EDG failures experienced in the last 20 and 100 tests. This practice of increasing the testing frequency with the number of failures is commonly referred to as accelerated testing. Accelerated testing is begun when an EDG experiences two or more failures in the last 20 tests or five failures in the last 100 tests. This increased test frequency continues until seven failure-free tests have been performed and the number of failures in the last 20 tests is reduced to one or zero.

As stated in GL 94-01, the staff has concluded that implementing the provisions of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (the maintenance rule), including the applicable regulatory guidance, will ensure reliable EDG performance. Measures to be implemented in accordance with the maintenance rule include performance of detailed root cause analysis of individual EDG failures, effective corrective actions to individual EDG failures, and implementation of EDG preventive maintenance. The staff has determined that the implementation of these measures will justify removing the accelerated testing requirements.

In its application dated November 18, 1994, the licensee committed to implement a program for monitoring and maintaining EDG performance in accordance with the provisions of the maintenance rule (10 CFR 50.65) and consistent with the guidance of Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants", Revision 0, June 1993. This will include the EDG and all associated support systems required to maintain operability. On the basis of the licensee's commitment to implement this maintenance program in accordance with GL 94-01, the staff finds the

proposed changes (1) removal of the reference to TS Table 4.8-1 for test intervals in TS 4.8.1.1.2a and 4.8.1.2, and (2) removal of the accelerated testing requirements for EDGs acceptable.

The licensee also proposes to delete TS 4.8.1.1.3, which requires licensees to report EDG failures to the NRC. The reporting requirements of TS 4.8.1.1.3 are associated with guidance contained in RG 1.108. In developing GL 94-01, the staff determined that existing reporting requirements, such as those of 10 CFR 50.73, adequately ensure that the NRC learns of significant problems with EDG performance. Therefore, the staff finds the deletion of TS 4.8.1.1.3 to be acceptable.

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments involve a change to surveillance requirements. The 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 (59 FR 63127). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). These amendments also involve changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

6.0 CONCLUSION

The Commission has concluded, based on the considerations 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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