

April 7, 1995

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT
NOS. 38 AND 24 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
(TAC NOS. M89421 AND M89422)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 38 and 24 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 (TSs) in response to your application dated April 22, 1994 (Reference LAR 94-011, TXX-94116).

These amendments change Technical Specification 3/4.7.1.2 "Auxiliary Feedwater System," Surveillance Requirement 4.7.1.2 operational test frequency of the Motor Driven and Turbine Driven pumps from "at least once per 31 days on a STAGGERED TEST BASIS" to "at least once per 92 days on a STAGGERED TEST BASIS." This change is consistent with ASME Section XI requirements and Generic Letter (GL) 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operations."

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

Docket Nos. 50-445 and 50-446

Enclosures: 1. Amendment No. 38 to NPF-87
2. Amendment No. 24 to NPF-89
3. Safety Evaluation

cc w/encs: See next page

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

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Sincerely,

A handwritten signature in cursive script, reading "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

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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. 38
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 April 22, 1994 (Reference LAR 94-011, TXX-94116), 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. 38, 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.

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: April 7, 1995



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. 24
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 April 22, 1994 (Reference LAR 94-011, TXX-94116), 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. 24, 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.

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: April 7, 1995

ATTACHMENT TO LICENSE AMENDMENT NOS. 38 AND 24
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.

REMOVE

3/4 7-3
3/4 7-4

INSERT

3/4 7-3
3/4 7-4

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two motor-driven auxiliary feedwater pumps, each capable of being powered from separate emergency busses, and
- b. One steam turbine-driven auxiliary feedwater pump capable of being powered from two OPERABLE steam supplies.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one auxiliary feedwater pump or associated flow path inoperable, restore the required auxiliary feedwater pump or associated flow path to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two auxiliary feedwater pumps or associated flow paths inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three auxiliary feedwater pumps or associated flow paths inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump or associated flow path to OPERABLE status as soon as possible.
- d. With only one OPERABLE steam supply system capable of providing power to the turbine-driven auxiliary feedwater pump, restore the required OPERABLE steam supplies within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump and associated flow path shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 - 1) Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in its correct position; and

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 2) Verifying that each auxiliary feedwater flow control and isolation valve in the flow path is in the fully open position whenever the Auxiliary Feedwater System is in standby for auxiliary feedwater automatic initiation or when above 10% RATED THERMAL POWER.
- b. At least once per 92 days on a STAGGERED TEST BASIS by:
- 1) Verifying that each motor-driven pump develops a differential pressure of greater than or equal to 1372 psid at a flow of greater than or equal to 430 gpm;
 - 2) Verifying that the steam turbine-driven pump develops a differential pressure of greater than or equal to 1450 psid at a test flow of greater than or equal to 860 gpm when the secondary steam supply pressure is greater than 532 psig. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3;
- c. At least once per 18 months by:
- 1) Verifying that each automatic valve in the flow path actuates to its correct position upon receipt of an Auxiliary Feedwater Actuation test signal, and
 - 2) Verifying that each auxiliary feedwater pump starts as designed automatically upon receipt of an Auxiliary Feedwater Actuation test signal*. The provisions of Specification 4.0.4 are not applicable to the turbine driven auxiliary feedwater pump for entry into MODE 3.

*The surveillance test interval is extended to 24 months for testing the start of the Unit 2, Train A Motor Driven Auxiliary Feedwater Pump upon receipt of an Auxiliary Feedwater Actuation test signal, to remain in effect until the completion of the second refueling outage for Unit 2.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 38 AND 24 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 April 22, 1994 (Reference LAR 94-011, TXX-94116), 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 revise Technical Specification 3/4.7.1.2 "Auxiliary Feedwater System," Surveillance Requirement 4.7.1.2 operational test frequency of the Motor Driven and Turbine Driven pumps from "at least once per 31 days on a STAGGERED TEST BASIS" to "at least once per 92 days on a STAGGERED TEST BASIS." This change is consistent with ASME Section XI requirements and Generic Letter (GL) 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operations." Additionally, this change is based directly on the recommendations of NUREG-1366 "Improvements to Technical Specifications Surveillance Requirements," Item 9.1, "Auxiliary Feedwater Pump and System Testing (PWR)."

2.0 BACKGROUND

The auxiliary feedwater (AFW) system is designed to provide a supply of high-pressure feedwater to the secondary side of steam generators for removal of decay heat from the reactor coolant system. The AFW system consists of two motor-driven pumps and one turbine driven pump with dedicated flow paths to the four steam generators. To ensure operability of the AFW system, the pumps are currently tested on a monthly basis as required by the CPSES Technical Specifications (NUREG-1468) and Westinghouse Standard Technical Specifications (NUREG-1431).

The NRC completed a comprehensive examination of technical specification surveillance requirements that require testing at power. This effort was part of the NRC Technical Specification Improvement Program. The results of this work are reported in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements," dated December 1992. The staff issued GL 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operations," dated September 27, 1993,

to assist licensees in preparation of license amendment requests to implement these recommendations as line-item technical specification improvements. One of those line-item improvements was Surveillance Requirement 4.7.1.2.

3.0 EVALUATION

The staff found in NUREG-1366 that while the majority of testing at power is important, safety can be improved, equipment degradation decreased, and unnecessary burden on personnel resources eliminated by reducing the amount of testing that technical specifications require during power operation. However, only a small fraction of technical specification surveillance intervals warranted relaxation. One recommendation in NUREG-1366, was for Item 9.1, "Auxiliary Feedwater Pump and System Testing (PWR)." The recommendation was, "Change frequency of testing AFW pumps to quarterly on a staggered basis."

A reduction in the frequency of operational testing of the AFW pumps from monthly to quarterly on a staggered basis is a reasonable step to reduce the rate of wear for these pumps, to decrease the burden on licensee personnel resources, and to increase AFW system availability. The reduction in wear results directly from deleting approximately eight starts per year for each pump. Likewise, the decrease in burden on licensee personnel resources results from not having to schedule, set up for and perform eight surveillance per pump per year. The licensee's plant-specific design alters the impact of this change on AFW system pump availability when compared to GL 93-05. The supporting material for GL 93-05 noted that AFW system pump availability problems resulted from frequent pump tests using reduced flow test lines. These reduced flow test lines generally allowed testing while the pump remained available for service, but caused accelerated degradation. The CPSES design has full flow test lines which avoids this accelerated degradation; however, the AFW system pumps must be taken out of service to perform the system line-ups needed for testing. Reducing testing will reduce the out-of-service time due to testing for these pumps.

Additionally, the ASME Boiler and Pressure Vessel Code, Section XI, requires the testing of Class 1, 2 and 3 centrifugal pumps "normally every three months." The licensee follows the 1989 version of Section XI for pump testing, which implements the requirements of OM-6. This later version of Section XI is more vibration oriented than earlier versions since industry experience has shown vibration to be the most sensitive and earliest indication of pump degradation. The licensee's experience confirms that vibration measurement has been the most effective indicator of pump degradation and typically well in advance of pump failure. Vibration testing is performed as part of the quarterly Section XI test at CPSES.

Finally, the proposed changes are consistent with the guidance provided in GL 93-05, Item 9.1, "Auxiliary Feedwater Pump and System Testing (PWR)." Therefore, the staff concludes that the proposed technical specification changes do not adversely affect plant safety, will result in a net benefit to the safe operation of the facility, and are 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 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 and surveillance requirements. 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 (59 FR 39598). 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.

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.

Principal Contributor: Timothy Polich

Date: April 7, 1995