

December 9, 1994

Mr. C. Lance Terry
Group Vice President, Nuclear
TU Electric
400 North Olive Street, L.B. 81
Dallas, Texas 75201

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT
NOS. 33 AND 19 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. 33 and 19 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 11, 1994 as supplemented by letter dated November 16, 1994.

The amendments modify Technical Specification Table 4.8-1, "Diesel Generator Test Schedule," such that the valid diesel generator failures experienced on December 16, 1993 and October 31, 1994, will not contribute towards accelerated testing of the Unit 2 Train B emergency diesel generator. This amendment follows our letter of November 18, 1994, which granted enforcement discretion to immediately terminate accelerated testing of the Unit 2 Train B emergency diesel generator.

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

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Docket Nos. 50-445
and 50-446

- Enclosures: 1. Amendment No. 33 to NPF-87
2. Amendment No. 19 to NPF-89
3. Safety Evaluation

cc w/encls: See next page

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OFC	LA/PD4-1	PM/PD4-1 <i>EP</i>	EELB <i>CMB</i>	OGC
NAME	<i>EPeyton</i>	TPolich:mk	CBerlinger	<i>OGC</i>
DATE	12/1/94	12/1/94	12/01/94	12/1/94
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 9, 1994

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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. 33 to NPF-87
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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

cc:

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Honorable Dale McPherson
County Judge
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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. 33
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 11, 1994, as supplemented by letter dated November 16, 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. 33, 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.

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: December 9, 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. 19
License No. NPF-89

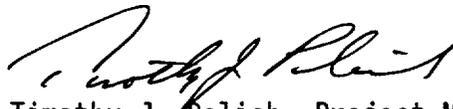
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 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can 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. 19, 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.

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: December 9, 1994

ATTACHMENT TO LICENSE AMENDMENT NOS. 33 AND 19

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

DOCKET NOS. 50-445 AND 50-446

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

REMOVE

3/4 8-9

INSERT

3/4 8-9

TABLE 4.8-1

DIESEL GENERATOR TEST SCHEDULE

<u>NUMBER OF FAILURES IN LAST 20 VALID TESTS*</u>	<u>NUMBER OF FAILURES IN LAST 100 VALID TESTS*</u>	<u>TEST FREQUENCY</u>
≤ 1	≤ 4	Once per 31 days
≥ 2**	≥ 5	Once per 7 days

*Criteria for determining number of failures and number of valid tests shall be in accordance with Regulatory Position C.2.e of Regulatory Guide 1.108, but determined on a per diesel generator basis, except that the valid test failures of the Unit 2 Train B diesel generator identified on December 16, 1993, and October 31, 1994, may be excluded from the total number of failures used to determine the diesel generator test frequency.

For the purpose of determining the required test frequency, the previous test failure count may be reduced to zero if a complete diesel overhaul to like-new condition is completed, provided that the overhaul, including appropriate post-maintenance operation and testing, is specifically approved by the manufacturer and if acceptable reliability has been demonstrated. The reliability criterion shall be the successful completion of 14 consecutive tests in a single series. These tests shall be in accordance with the routine Surveillance Requirements 4.8.1.1.2a.4) and 4.8.1.1.2a.5). If this criterion is not satisfied during the first series of tests, any alternate criterion to be used to transvalue the failure count to zero requires NRC approval.

**The associated test frequency shall be maintained until seven consecutive failure free demands have been performed and the number of failures in the last 20 valid demands has been reduced to one.

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, 4.8.1.1.2* (except for Specification 4.8.1.1.2a.5)), and 4.8.1.1.3.

*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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 33 AND 19 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 11, 1994, as supplemented by letter dated November 16, 1994, 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 Table 4.8-1, "Diesel Generator Test Schedule," by excluding two valid failures of the Unit 2 Train B emergency diesel generator (EDG) from contributing towards an accelerated test schedule. The November 16, 1994, supplemental letter was clarifying in nature and did not change the initial no significant hazards consideration determination.

2.0 BACKGROUND

The CPSES design employs 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) are exceeded, the frequency of testing is accelerated to weekly.

During the past year, CPSES experienced two failures of the Unit 2 Train B EDG that were attributed to fatigue cracking of a fuel header line (1/4-inch tubing) which occurred due to the mass of a valve vibrating at the end of the tubing. This then stressed the rigid point of the tubing connection to the fuel piping causing failure. The tube that failed on the Unit 2 Train B EDG is the only location that uses this configuration in a vent connection. The other such vent location on Unit 2 has the vent valve connected directly to the tap off the fuel oil header and tubing is not used between the tap and the vent valve.

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On October 31, 1994, the Unit 2 Train B Diesel Generator was in operation for testing. It had successfully completed a start and loading above 50 percent for greater than one hour (one hour at 100 percent and two hours at 110 percent). During the run, a vent line (1/4-inch tubing) on the fuel header came free of the fuel header it was attached to and fuel oil sprayed into the room. A previous failure occurred on December 16, 1993, and the corrective action was to replace the tubing with thicker tubing to make the line less susceptible to failure. It was this thicker tubing that failed on October 31, 1994.

By letter dated November 11, 1994 (TXX-94306), the licensee submitted an application to modify Technical Specification Table 4.8-1 such that the fatigue cracking failures of the fuel vent header would not contribute towards accelerated diesel generator testing. The licensee's application proposed a modification to the EDGs that would eliminate vent valves and tubing of concern from the Unit 2 EDGs fuel headers and plug the remaining holes.

By letter dated November 16, 1994 (TXX-94309), verified the tubing and vent valves were removed and the remaining holes on the fuel header were plugged on the Unit 2 EDGs. Therefore, the failure mode of fatigue cracking in the fuel header tubing was eliminated.

By separate letter dated November 11, 1994 (TXX-94305), the licensee requested enforcement discretion to immediately terminate accelerated testing of the Unit 2 Train B EDG upon completion of the design change to remove the vent valves and tubing. The staff approved this request on November 18, 1994. The enforcement discretion was effective for 30 days or until the staff completed action on the proposed changes to the technical specifications.

3.0 EVALUATION

Due to the two failures of the fuel header vent line tubing, the test frequency specified in CPSES Technical Specifications Table 4.8-1 requires that the test frequency be increased from once per 31 days to once per 7 days if the number of failures in the last 20 valid tests is greater than or equal to 2. The seven day test frequency must be maintained until seven consecutive failure free demands have occurred and the number of failures in the last 20 valid demands has been reduced to one.

The licensee requested that the technical specifications be changed such that both failures on the Unit 2 Train B EDG caused by vent tubing failure be excluded from the total number of failures used to determine the EDG test frequency.

The intent of these Surveillance Requirements, in part, is to identify events that result in unsuccessful runs of the diesel generator to identify when additional actions are appropriate to assure the reliability of the diesel generators.

The staff concludes that corrective actions taken precludes recurrence of similar EDG failures as the two described above by eliminating the failure mode; accelerated EDG testing would provide no benefit as the failure mechanism which existed is no longer credible; and excessive and unnecessary testing of EDGs can cause increased wear and degradation and thus contribute to their reduced reliability. Therefore, the staff finds the licensee's proposal to exclude the two individual test failures from contributing towards an accelerated test schedule to be acceptable.

4.0 EXIGENT CIRCUMSTANCES

The Commission's regulation, 10 CFR 50.91, contains provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where the staff and licensee need to act promptly and the staff has determined that the amendment involves no significant hazards considerations.

Under such circumstances, the Commission notifies the public in one of two ways: by issuing a Federal Register notice providing an opportunity for hearing and allowing at least two weeks for prior public comments, or by issuing a press release discussing the proposed changes, using the local media. In this case, the Commission used the first approach.

The licensee has identified the events of December 16, 1993 and October 31, 1994, as representing valid failures for the Unit 2 Train B EDG. While Technical Specification Table 4.8-1 requires the test frequency of the Unit 2 Train B EDG to be increased from monthly to weekly, such testing would not test the failure mode of the two valid failures. Due to recent failures, Technical Specifications would require weekly testing until the third week of December 1994 (assuming no additional failures are encountered). As previously stated, the staff desires to eliminate all unnecessary testing of the EDGs as it can contribute to an overall degradation in the EDG. Since the staff considers such testing to be unnecessary, prompt action is required to eliminate this requirement.

The licensee submitted the request for amendment on November 11, 1994, supplemented by letter dated November 16, 1994. It was noticed in the Federal Register on November 23, 1994 (59 FR 69399), at which time the staff proposed a no significant hazards consideration determination. In its letter of November 11, 1994, the licensee requested that the amendment be issued promptly. The licensee stated that such action would be necessary to preclude unnecessary testing of the Unit 2 Train B EDG and that such testing could result in an overall degradation of the EDG. Due to time constraints, sufficient time was not available to permit the customary 30-day public notice in advance of this action.

Accordingly, pursuant to 10 CFR 50.91(a)(6), the Commission has determined that an exigent situation exists in that failure to act in a timely way will result in unnecessary and excessive testing of the Unit 2 Train B EDG which

can contribute to an overall degradation of the EDG. Further, the Commission has determined that the exigent situation is not due to the failure of the licensee to act in a timely manner.

There were no public comments in response to the notice published in the Federal Register.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed change to the technical specifications does not alter the current plant design or operation. The proposed change simply permits the licensee to exclude two failures of the Unit 2 Train B EDG from contributing towards an accelerated test schedule. The licensee has taken corrective actions by removing the vent valves and tubing and plugging the remaining holes. This should eliminate this failure mode from recurring and restore the reliability of the EDG. Additional testing as required by the existing technical specifications will not provide meaningful results and may, in fact, contribute towards a long-term reduction in the overall reliability of the diesel generator. Resumption of the normal monthly testing requirements combined with the above corrective actions provide sufficient assurance that the Unit 2 Train B EDG will remain capable of performing its intended function. Therefore, the proposed change will not result in a significant increase in the probability or the consequences of any accident previously evaluated.

The proposed change will permit the licensee to resume a monthly test schedule for the Unit 2 Train B EDG. This change does not alter the current plant design or operation. Therefore, no new failure modes are introduced and the proposed change to the technical specifications will not create the possibility of a new or different kind of accident from any accident previously evaluated.

As previously stated, the proposed change will permit the licensee to resume monthly testing of the Unit 2 Train B EDG. Therefore, the only margin of safety that could be affected by this proposed change would be the reliability of the EDG. However, following the corrective actions taken by the licensee to remove the vent valves and tubing and plug the remaining holes, accelerated testing as currently required by the technical specifications would not provide any additional assurance of reliability. Rather, increased testing

leads to additional cycling and degradation of the EDG which, in the longer term, can lead to an overall reduction in reliability of the EDG. The corrective actions combined with the monthly surveillance tests provide sufficient assurance of the reliability of the Unit 2 Train B EDG. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based upon the above considerations, the staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

6.0 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.

7.0 ENVIRONMENTAL CONSIDERATION

The amendments change a surveillance requirement. 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 69399). 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.

8.0 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 J. Polich

Date: December 9, 1994