October 6, 1994

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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. 29 AND 15 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89 (TAC NOS. M89419 AND M89420)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 29 and 15 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 April 25, 1994.

The amendments revise TS Surveillance Requirement 4.8.1.1.2 to allow "slow starts" of the emergency diesel generator (EDG) instead of "fast starts" during the monthly surveillance. A "fast start" is still required to be performed at least once every 184 days. These changes are expected to improve EDG availability and reliability.

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

Docket Nos. 50-445
and 50-446

Enclosures:
1. Amendment No. 29 to NPF-87
2. Amendment No. 15 to NPF-89
3. Safety Evaluation

cc w/encls:
See next page

110050

*See previous concurrence
DOCUMENT NAME: CP89419.AMD

OFFICE	PDIV-2/LA	PDIV-1/PM	*EELB	*EMEB	*OGC	PDIV-1/D
NAME	EPeyton	TBergman:mk	CBerlinger	RWessman		WBeckner
DATE	10/4/94	10/4/94	8/18/94	9/13/94	9/20/94	10/5/94

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

October 6, 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. 29 AND 15 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89 (TAC NOS. M89419 AND M89420)

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See next page

Mr. C. Lance Terry
TU Electric Company

Comanche Peak, Units 1 and 2

cc:
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 1029
Granbury, Texas 76048

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Mrs. Juanita Ellis, President
Citizens Association for Sound Energy
1426 South Polk
Dallas, Texas 75224

Mr. Roger D. Walker, Manager
Regulatory Affairs for Nuclear
Engineering Organization
Texas Utilities Electric Company
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Texas Utilities Electric Company
c/o Bethesda Licensing
3 Metro Center, Suite 610
Bethesda, Maryland 20814

William A. Burchette, Esq.
Counsel for Tex-La Electric
Cooperative of Texas
Jorden, Schulte, & Burchette
1025 Thomas Jefferson Street, N.W.
Washington, D.C. 20007

GDS Associates, Inc.
Suite 720
1850 Parkway Place
Marietta, Georgia 30067-8237

Jack R. Newman, Esq.
Newman & Holtzinger
1615 L Street, N.W.
Suite 1000
Washington, D.C. 20036

Chief, Texas Bureau of Radiation
Control
Texas Department of Health
1100 West 49th Street
Austin, Texas 78756

Honorable Dale McPherson
County Judge
P. O. Box 851
Glen Rose, Texas 76043

Office of the Governor
ATTN: Susan Rieff, Director
Environmental Policy
P. O. Box 12428
Austin, Texas 78711

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. 29
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 25, 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. **29**, 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

William D. Beckner, Director
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: **October 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. 15
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, 25, 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. **15**, 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

William D. Beckner

William D. Beckner, Director
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: **October 6, 1994**

ATTACHMENT TO LICENSE AMENDMENT NOS. 29 AND 15

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	INSERT
3/4 8-3	3/4 8-3

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. In accordance with the frequency specified in Table 4.8-1 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. |

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.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 29 AND 15 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 25, 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, Units 1 and 2. The proposed changes would revise the TS Surveillance Requirement 4.8.1.1.2 to allow "slow starts" of the emergency diesel generator (EDG) instead of "fast starts" during the monthly surveillance. A "fast start" is still required to be performed at least once every 184 days. These changes are expected to improve EDG availability and reliability.

2.0 BACKGROUND

Surveillance Requirement (SR) 4.8.1.1.2 currently requires, in part, that the EDGs be started on a monthly basis from an ambient condition and accelerated to at least 441 rpm in less than or equal to 10 seconds. This is a "fast start." The staff has previously taken the position that fast starts can result in accelerated deterioration and reduced reliability of EDGs. This staff position has been stated in Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," and a staff safety evaluation dated March 17, 1994, "Safety Evaluation, Inspection Requirements for Transamerica Delaval, Inc. Diesel Generators." The EDGs at CPSES were manufactured by Transamerica Delaval, Inc. (TDI).

The licensee has proposed that the monthly surveillance allow a "slow start" instead of a fast start. A slow start involves a gradual acceleration to synchronous speeds as recommended by the manufacturer. A fast start would still be required at least once every 184 days. The licensee's proposed changes are consistent with the recommendations in Generic Letter 84-15 and the March 17, 1994, safety evaluation concerning TDI diesel generators.

3.0 EVALUATION

In Generic Letter 84-15, the staff concluded that the frequency of fast start tests from ambient conditions for EDGs should be reduced. The basis for this conclusion was that this testing results in incremental degradation of diesel engines and that, if proper procedures covering warmup prelubrication, loading/unloading, etc., were taken, would avoid premature wear of the engine and lead to an improvement in reliability and availability. The staff's March 17, 1994, safety evaluation concerning TDI diesel generators restated the benefits described in Generic Letter 84-15, and noted that reducing the number of fast starts on TDI diesel generators was acceptable.

The changes to the TS proposed by the licensee are consistent with Generic Letter 84-15 and the staff's March 17, 1994, safety evaluation, and are, therefore, 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 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 39599). 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: T. Bergman

Date: October 6, 1994