TU ELECTRIC

Log # TXX-89824
File # 914.2
10010
Ref. # 10CFR50.34(b)

December 6, 1989

William J. Cahill, Jr.
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
DEFERRAL OF PREOPERATIONAL TESTING

REF: TU Electric Letter TXX-89460 from W. J. Cahill, Jr. to the NRC dated July 14, 1989

Gentlemen:

As a supplement to the referenced letter, TU Electric is providing a list of the preoperational testing items that it has requested to defer past fuel load (see attachment "POST FUEL LOAD DEFERRED RETEST").

This list is tentative pending the completion of TU Electric's review of the preoperational test program. Upon completion of this review, a list of additional deferred testing items, if any, will be provided.

Sincerely,

William J. Cahill, Jr.

RSB/bjh
Attachment

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)
Mr. J. H. Wilson, OSP-NRC

0030
1/1

POST FUEL LOAD DEFERRED RETEST

1. Sampling Systems

   Demonstrate the secondary and process sampling systems provide samples for analysis within the design requirements for flow rates, temperatures and pressures.

   Numerous design changes which occurred on the sampling systems during and following the preoperational test required additional verification of the system operation. All testing which can be performed prior to hot, pressurized operation is scheduled to be completed prior to fuel load. Those tests which required pressure and temperature (flow path verifications and sample cooler performances) will be performed prior to entry into Mode 2.

2. Primary Plant Ventilation

   Demonstrate proper operation of the ventilation fans and filters, and verify adequate air flow to areas served.

   The filter testing can not be performed until after installation of the charcoal in the charcoal absorber housing. Charcoal installation will be deferred until extensive painting and cleaning in the areas is completed. The required charcoal loading and testing will be completed prior to entry into Mode 4 and will satisfy Technical Specification 3.7.8.

3. Safeguards Building Ventilation

   Demonstrate the ventilation system will maintain the temperature in the Main Steam Isolation Valve area within design requirements at normal operating temperature.

   The equipment necessary to verify system operability was not available during preoperational testing. The MSIV area temperatures will be verified to satisfy the design requirements at normal operating temperatures prior to entry into Mode 2.

4. Auxiliary Feedwater System

   Demonstrate that the turbine-driven pump is capable of delivering flow to the steam generators within the acceptable time after an initiating signal.

   A design change to the steam admission valves requires retesting the response time of the turbine-driven auxiliary feedwater pump. This testing will be completed in Mode 3 in order to comply with Technical Specification 3.7.1.2.

5. Fuel Pool Cooling and Cleanup System

   A. Verify proper actuation and operation of the pump in the spent fuel pool skimmer loop and verify correct flows in the loop.

      The reactor cavity skimmer pump can not be tested for flow until the reactor cavity is flooded. This pump is rated non-nuclear safety and is not needed until the first refueling outage. The flow-rate of the pump will be verified during the first refueling outage.

   B. Verify vibration level for piping and components are within acceptable limits.

      Modifications to pipe supports in the spent fuel pool can not be performed until the fuel is loaded into the reactor vessel. Completion of these modifications will require reverification of the piping vibration levels. These modifications and the subsequent pipe vibration testing is scheduled to be completed after fuel load and prior to Mode 2 entry.

6. Safety Injection

   Demonstrate check valve operability for valves 1-8841A, 1-8818A, B, C, and D.

   Maintenance was performed on these valves following the completion of the hot functional tests. The required post-maintenance test satisfies the preoperational testing as well as Technical Specification 4.4.5.2.2. This testing will be completed prior to entering Mode 2.

7. Response Time Testing of Main Steam Isolation Valves

   Reverify the response times for the MSIV's.

   Maintenance performed on the MSIVs since the completion of the hot functional testing requires that the MSIV response times be reverified. This will be performed in Mode 3 and will satisfy Technical Specifications 3.7.1.5.