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Ref. # NRCB 89-03

January 5, 1990

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
NRC BULLETIN 89-03; POTENTIAL LOSS OF REQUIRED
SHUTDOWN MARGIN DURING REFUELING OPERATIONS

Gentlemen:

TU Electric has evaluated the concerns of the subject bulletin. The reporting requirements of the bulletin state that prior to initial fuel loading, construction permit holders shall advise the NRC by letter whether the requested actions have been completed. In accordance with this requirement, the actions specified by the bulletin and the corresponding TU Electric responses for Units 1 and 2 are presented below.

Action 1

Assure that any intermediate fuel assembly configuration (including control rods) intended to be used during refueling is identified and evaluated to maintain sufficient refueling boron concentration to result in a minimum shutdown margin of approximately 5%.

TU Electric Response to Action 1

Prior to Unit 1 fuel load, the fuel vendor guidelines for assuring a minimum shutdown margin of 5% will be incorporated in the applicable CPSES refueling procedure (applicable to both Units 1 and 2). Intermediate fuel assembly configurations (including control rods) resulting from planned fuel shuffles will be evaluated against these guidelines and any discrepancies resolved. This evaluation is currently in process for the Unit 1 initial fuel load shuffle and will be completed prior to Unit 1 fuel load. The evaluation of the planned Unit 2 initial fuel load shuffle will be completed prior to Unit 2 fuel load. Subsequent planned refueling fuel shuffles for each Unit will also be evaluated against the vendor guidelines prior to implementation.

Action 2

Assure that fuel loading procedures only allow those intermediate fuel assembly configurations that do not violate the allowable shutdown margin and that these procedures are strictly adhered to.

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TU Electric Response to Action 2

As stated in the response to Action 1, vendor guidelines for assuring adequate shutdown margin will be incorporated into the applicable CPSES refueling procedure. Prior to Unit 1 fuel load, the applicable CPSES refueling procedure will be revised to require that, prior to implementation, changes in planned fuel shuffles resulting in new intermediate fuel assembly configurations be evaluated by the Fuel Handling Senior Reactor Operator and the on-shift Reactor Engineer to assure that shutdown margin requirements, as specified by the fuel vendor guidelines, will be maintained. Strict adherence to refueling procedures will be assured through the training described in the TU Electric response to Action 3 below.

Action 3


Assure that the staff responsible for refueling operations is trained in the procedures recommended in Item 2 above and understand the potential consequences of violating these procedures. This training should include the fundamental aspects of criticality control with higher enriched fuel assemblies.

TU Electric Response to Action 3

Refueling organizations personnel including, as a minimum, Fuel Handling Senior Reactor Operators and Reactor Engineers will be trained on the procedure revisions described in the TU Electric response to Actions 1 and 2 above. This training will emphasize strict adherence to refueling procedures and discuss the consequences of violating these procedures. The training will also include the fundamental aspects of criticality control with fuel assemblies of 3.5% enrichment which is the enrichment that TU Electric anticipates will be authorized by the Unit 1 fuel load license. The above training will be completed prior to Unit 1 fuel load. Future changes in fuel design or enrichment will be evaluated individually and the training will be modified as required.

For Unit 2, the above described training will be modified as required to reflect Unit 2 fuel assembly design and enrichments and will be performed prior to Unit 2 fuel load.

Sincerely,


William J. Cahill, Jr.

JDS/vld

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

Texas Utilities Electric Company

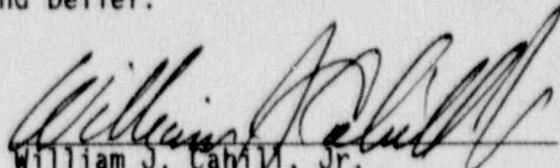
(Comanche Peak Steam Electric
Station, Units 1 & 2)

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Docket Nos. 50-445
50-446

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Executive Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to NRC Bulletin 89-03; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

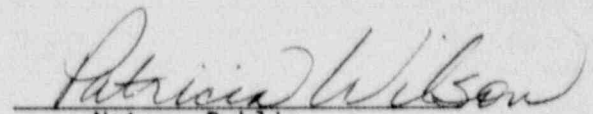

William J. Cahill, Jr.
Executive Vice President, Nuclear

STATE OF TEXAS

COUNTY OF SOMERVELL

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Subscribed and sworn to before me, a Notary Public, on this 5TH day of
January, 1990.


Notary Public

