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TEXAS UTILITIES GENERATING COMPANY

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2001 BRYAN TOWER - DALLAS, TEXAS 75201

File # 880

July 31, 1981

BILLY R. CLEMENTS
VICE PRESIDENT



Mr. Robert L. Tedesco
Assistant Director for Licensing
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Tedesco:

Provided below is clarification and supplemental information on several topics concerning conduct of operations at Comanche Peak Steam Electric Station (CPSES). This information was requested by members of the NRC staff in a meeting with representatives of Texas Utilities Generating Company (TUGCo) and Texas Utilities Services Incorporated (TUSI) at Bethesda, Maryland on June 25, 1981.

It is our intention to meet the requirements for minimum shift staffing by providing two radiation protection technicians onsite at all times in lieu of one radiation protection technician and one chemistry technician. As a minimum, one radiation protection technician will be qualified to initiate the post accident sampling and analysis process in the event of an accident.

The Independent Safety Engineering Group (ISEG) will consist of five engineers with experience in the areas of electrical, mechanical, and nuclear engineering. At this time, no individuals have been hired to fill positions as ISEG members. We are proceeding immediately to staff the ISEG with the most qualified individuals available. We will require a minimum of three years engineering experience for all individuals at the time they are assigned to the ISEG and will immediately involve them in the design, construction, preoperational testing and initial startup of CPSES to maximize their nuclear power plant experience. This program will ensure that when the ISEG is fully implemented 90 days prior to fuel load, the ISEG members are qualified to carry out their responsibility to improve the overall quality and safety of operations.

The status of the CPSES procedures required by NUREG 0737, "TMI Action Plan Requirements for Applicants for an Operating License," Items I.C.2 through I.C.6, is as follows:

Item I.C.2

As a positive means of accomplishing a transfer of knowledge from the offgoing to the oncoming operating shift, a shift and relief turnover procedure has been implemented. The procedure includes

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checklists for critical plant parameters, availability and proper alignment of safeguards systems, equipment status and identification of systems and components in degraded operating modes. The procedure also provides a means to evaluate shift relief and turnover effectiveness.

Item I.C.3

The duties, responsibilities and authority of the Shift Supervisor and control room operators are defined in approved CPSES procedures. These procedures have been reviewed and revised to ensure a clear delineation of the command decision authority of the Shift Supervisor and also a definite line of succession. A management directive from the Vice President, Nuclear will be issued prior to operation and annually thereafter to emphasize the primary management responsibility of the Shift Supervisor for safe operation of the plant. This directive is currently in draft form.

Item I.C.4

The responsibility and authority for limiting access to the Control Room is delineated in an approved procedure. In the event of an emergency, the approved CPSES Emergency Plan dictates a clear line of authority and responsibility in the Control Room.

Item I.C.5

The Operations Support Engineering section will perform the technical review of operating information, coordinate the distribution of applicable information to the affected plant personnel and review plant action plans for proper implementation. A procedure is currently being used to review INPO/NSAC reports. This assures that operating information pertinent to plant safety originating outside the TUGCo organization is continually supplied to operators and other applicable personnel. A procedure for assessment of operating information pertinent to plant safety originating within TUGCo will be implemented before fuel load. A draft training procedure has been written to ensure that information received through operational experience is incorporated into training lessons.

The CPSES Startup Program will utilize information gained from operating and testing experience in the Farley and Trojan Nuclear Plants to provide guidance in the development of a test program. LERs dated after January 1, 1978 are being reviewed.

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Item I.C.6

Station procedures have been reviewed and revised to provide an effective system of verifying the correct performance of operating activities. The latest draft revision to ANS 3.2 has been reviewed and appropriate sections have been included in the procedures. The procedures address the authority to release systems and equipment for maintenance or surveillance testing and to return them to service. Provisions have been made to ensure that the Shift Supervisor is kept fully informed of system status and that proper system alignment is verified by qualified personnel.

If you have any questions, please contact this office.

Yours very truly,

Billy R. Clement

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