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General Manager	and	RHartfield, MPA	
Texas Utilities Generating	g Company	OLE (2)	
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Dallas, Texas 75201	and received in a stars of a	of the second	

Dear Mr. Gary:

Subject: Request for Additional Information for Comanche Peak Steam Electric Station, Units 1 and 2

Enclosed is a request for additional information which we require to complete our evaluation of your application for operating licenses for Comanche Peak Steam Electric Station, Units 1 and 2. This request for additional information is the result of our continuing review by the Quality Assurance Branch and the Core Performance Branch. This letter documents two questions informally provided to your staff earlier. Please amend your FSAR to include the information requested in the Enclosure.

A timely response to these questions will enable us to proceed with this review. Should you have any questions concerning this request for additional information, please contact us.

Sincerely,

Original signed by: B. J. Youngblood B. J. Youngblood, Chief Licensing Branch No. 1 Division of Licensing

Enclosure: Request for Additional Information

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cc w/encl.: See next page



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NAC FORM 318	(10-80) NRCM 0240		OFFICIAL	RECORD C	OPY	USGPO: 1981335-960

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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

COMANCHE PEAK STEAM ELECTRIC STATICN, UNITS 1 & 2

DOCKET NOS. 50-445 AND 50-446

260.0 QUALITY ASSURANCE BRANCH

- 260.1 Section 17.1.2.2 of the standard format (Regulatory Guide 1.70) requires the identification of safety-related structures, systems, and components controlled by the QA program. You are requested to supplement and clarify the Comanche Peak FSAR Table 17A-1 in accordance with the following:
 - a. Provide a commitment that FSAR Table 17A-1 items which show Note 3, 4, 6, 23, 26, 27, or 32 will be subject to the pertinent requirements of the FSAR operational quality assurance program during the operations phase of Comanche Peak.
 - b. The following items do not appear on FSAR Table 17A-1. Add the appropriate items to the table and provide a commitment that the remaining items are subject to the pertinent requirements of the FSAR operational quality assurance program or justify not doing so.
 - 1. Safety-related masonry walls (see IE Bulletin No. 80-11).
 - 2. PORV block valves and their actuators.
 - 3. Leak detection system (see FSAR Section 5.2.5).
 - Missile barriers which protect safety-related items.
 - Containment sump, sump screen, and vortex suppression devices.
 - 6. RHR system relief valves.
 - Onsite power system (Class 1E).
 - a) AC control power intervers.
 - b) Raceway fire stops and seals.
 - c) Conduit and cable trays and their supports (including non-Class lE items whose failure during a seismic event could damage other safety-related items).
 - Instrumentation, control, and power cables (including underground cable system, cable splices, connectors, and terminal blocks).
 - 8. DC power system (Class 1E).
 - a) Cables.
 - b) Conduit and cable rays and their supports (including non-Class IE items whose failure during a seismic event could damage other safety-related items).
 - c) Protective relays and control panels.
 - 9. Radiation monitoring (fixed and portab" ...
 - 10. Radioactivity monitoring (fixed and portable).

- 11. Radioactivity sampling (air, surfaces, liquids).
- 12. Radioactive contamination measurement and analysis.
- Personnel monitoring internal (e.g., whole body counter) and external (e.g., TLD system).
- 14. Instrument storage, calibration, and maintenance.
- 15. Decontamination (facilities, personnel, and equipment).
- 16. Respiratory protection, including testing.
- 17. Contamination control.
- 18. Radiation shielding.
- 19. Equipment needed + implement the meteorological data collection program.
- Expendable and consumable items necessary for the functional performance of safety-related structures, systems, and components (i.e., weld rod, fuel oil, boric acid, snubber oil, etc.).
- Measuring and test equipment used for safety-related structures, systems, and components.
- 22. Fuel building HVAC systems.
- 23. Fuel building radiation monitors.
- 24. Fuel assemblies.
- 25. Valve operators for safety-related valves.
- 26. ESF charcoal and HEPA filter trains (cf. Reg. Guide 1.52)
 - a) Safeguards Building.
 - b) Auxiliary Building.
 - c) Fuel Building.
 - d) Containment.

- c. The following items from FSAR Table 17A-1 need expansion and/or clarification as noted. Revise the table as indicated or justify not doing so.
 - Clarify that "Detectors" (item 41) includes the source and the intermediate range neutron flux monitors.
 - Clarify note 27 to Table 17A-1 to provide assurance that the pertinent requirements (instead of "certain portions") of Appendix B are met.
 - 3. FSAR Amendment 12 deleted the refueling water storage tank and the reactor makeup water storage tank from item 36 of Table 17A-1. Clarify that these items are subject to the pertinent controls of the QA program.
 - 4. Under item 15 of Table 17A-1, there are pumps, piping, and valves which show note 22 under the heading "ANS Safety Class." Note 22 indicates these components are covered by IEEE 387, but IEEE 387 provides no guidance for such components. Clarify.
 - Clarify that the diesel generator set under item 15 of Table 17A-1 includes the voltage regulator.
 - Branch Technical Position ETSB 11-1 has been replaced by Regulatory Guide 1.140. Clarify note 34 to Table 17A-1 accordingly.
 - 7. Note 28 to Table 17A-1 does not appear to be appropriate for the fuel handling bridge crane (page 25) or for the damaged fuel container (page 26) which are under item 33 of the table. Delete this note from these components or justify not doing so.

d. Enclosure 2 of NUREG-0737, "Clarification of TMI Action Plan Requirements" (November 1980) identified numerous items that are safety-related and appropriate for OL application and therefore should be on FSAR Table 17A-1. These items are listed below. Add the appropriate items to FSAR Table 17A-1 and provide a commitment that the remaining items are subject to the pertinent requirements of the FSAR operational quality assurance program or justify not doing so.

NUDEC 0727

		(Enclosure 2) Clarification Item
1)	Plant-safety-parameter display console.	I.D.2
2)	Reactor coolant system vents.	II.B.1
3)	Plant shielding capability.	1I.B.2
4)	Post accident sampling capabilities.	II.B.3
5)	Valve position indication.	II.D.3
6)	Auxiliary feedwater system.	II.E.1.1
7)	Auxiliary feedwater system initiation and flow.	II.E.1.2
8)	Emergency power for pressurizer heaters.	II.E.3.1
9)	Dedicated hydrogen penetrations.	II.E.4.1
10)	Containment isolation dependability.	II.E.4.2
11)	Accident monitoring instrumentation.	II.F.1
12)	Instrumentation for detection of inadequate core-cooling.	II.F.2
13)	Power supplies for pressurizer relief valves, block valves, and level indicators.	II.G.1
14)	Automatic PORV isolation.	II.K.3(1)
15)	Automatic trip of reactor coolant pumps.	II.K.3(5)
16)	PID controller.	II.K.3(9)
17)	Anticipatory reactor trip on turbine trip.	II.K.3(12)
18)	Power on pump seals.	II.K.3(25)
19)	Emergency plans (and related equipment).	III.A.1.1/III.A.2

20)	Equipment and other items associated with the emergency support facilities.	III.A.1.2
21)	Inplant I ₂ radiation moritoring.	III.D.3.3
22)	Control-room habitability.	III.D.3.4

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490.0 CORE PERFORMANCE BRANCH

492.1 Standard Format and Content of Safety Analysis Reports, Figulatory Guide 1.70, states that in Chapter 4 of the SAR

> "... the applicant should provide an evaluation and supporting information to establish the capability of the reactor to perform its safety functions throughout its design lifetime under all normal operation modes ..."

Are the analyses presented in Section 4.4 representative of the initial core only or have future cycles been analyzed? Provide a discussion of how power distributions for future cycles are considered in the FSAR analyses. Is there any assurance that the Comanche Peak units can operate at the licensed power level without excessive DNB trips throughout future cycles? Will revisions to the design methodolchy be required in order to maintain sufficient thermal margin?