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Executive Vice President

April 12, 1990

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
COMPARISON OF DISPLAY AND CONTROL REQUIREMENTS
WITH A CONTROL ROOM INVENTORY

- REF: 1) U. S. Nuclear Regulatory Commission, "Safety Evaluation Report related to the operation of Comanche Peak Steam Electric Station, Units 1 and 2", NUREG-0797, Supplement 22, dated January, 1990
- 2) D. G. Eisenhut (NRC), "Supplement 1 to NUREG-0737 Requirements for Emergency Response Capability," Generic Letter 82-33, dated December 17, 1982
- 3) William J. Cahill, Jr. "Docketing of Miscellaneous Commitments." TU Electric letter (TXX-90005) dated January 4, 1990

Gentlemen:

As indicated in reference 1, during the NRC staff's January 18 and 19, 1989, audit of the CPSES Detailed Control Room Design Review (DCRDR), a number of inconsistencies in terminology and labelling were identified along with several inconsistencies between the parameter values documented in the emergency operating procedures (EOPs) and the values which can be read on the control displays. In the same reference, in item I.D.1, "Control Room Design Review," of Section 22.2, "Discussion of [TMI-2] Requirements," it was stated that, in order to complete the DCRDR requirement of reference 2, a supplemental, detailed comparison of display and control requirements to the control room inventory should be performed for the additional task analysis of symptoms and entry conditions, and further, that this supplemental comparison should include verification in the control room. It was also stated that the previous comparison of required display characteristics for all EOP tasks should be checked in the control room to ensure that the parameter values and ranges specified in the procedures can in fact be read on the existing displays, and that the labels and terminology are consistent. As indicated in reference 3, TU Electric committed to complete this activity and submit a report prior to exceeding 5% power for Unit 1. This letter constitutes that report.

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Before describing this task, it should be indicated that, when the DCRDR audit was conducted in January, 1989, the EOPs in effect were Revision 2 and the procedure governing EOP changes, i.e., ODA-204, "Preparation of Emergency Response Guidelines," was Revision 5. Since that time, the EOPs have progressed through several improvements, as has ODA-204. The EOPs are currently Revision 5 and the ODA is Revision 8. Further, at the time of the NRC's team inspection of Emergency Response Guidelines (ERGs) in August, 1989, the EOPs used by the team were Revision 4 and the then current ODA-204 was Revision 7. In preparation for the August, 1989, team inspection of ERGs, all 43 of the EOPs underwent a complete plant walkdown, including the symptoms and entry conditions and attachments, as well as a series of independent audits. The walkdown included checks to assure that labels and terminology are consistent, as well as a determination of the adequacy of indicator ranges and their readability. As a result of these audits and walkdowns, changes were made to the Rev. 4 EOPs, including a number of corrections to EOP-0.0 and its symptoms and entry conditions.

The work performed in completing the commitment made in reference 3 was separated into two tasks and is summarized below:

Task 1- A supplemental, detailed comparison of display and control requirements to the control room inventory should be performed for the additional task analysis of symptoms and entry conditions; this should include verification in the control room (see reference 1, pg. 22-3).

Task 1 response- This supplemental, detailed comparison, including verification in the control room, was performed in January of this year. The results of the additional task analysis, which was performed on the symptoms and entry conditions for all 43 EOPs, identified a number of deficiencies with regard to the instrumentation to be used in carrying out the steps of the symptoms and entry conditions. The specific instrumentation involved was recorded on Indicator Worksheets prepared for the ERG Guideline Task Analysis. These deficiencies resulted from the fact that the task analysis which was performed, as required by ODA-204, when the EOPs changed from Rev. 3 to Rev. 4, did not contain a requirement to include the symptoms and entry conditions. Since then, ODA-204 has been revised to require that the symptoms and entry conditions be included in the function and task analysis which is to be performed when EOPs are revised. This new requirement was effective when the EOPs were changed from Rev. 4 to Rev. 5 in March of this year, at which time the Rev. 5 symptoms and entry conditions underwent a task analysis.

It is to be noted that the current set of Rev. 5 EOPs has had these deficiencies corrected.

Task 2- The previous comparison of required display characteristics for all EOP tasks should be checked in the control room to ensure that parameter values and ranges specified in the procedures can in fact be read on the existing displays, and that the labels and terminology are consistent (see reference 1, pg. 22-3).

Task 2 response- This task was performed in January of this year by actually walking through each of the draft Rev. 5 EOPs in the control room using the function and task analysis for the Rev. 4 EOPs to check the display instrumentation for readability, range adequacy and consistency in labelling and terminology. This review identified one inadequacy which resulted in a change to the steam generator pressure setpoint in order to improve readability.

Both of these tasks were performed by a SRO licensed supervisor and a RO licensed operator. The Indicator Worksheets used during performance of the function and task analysis in Task 1 were prepared by an operations engineer who is currently enrolled in the shift technical advisor program. These work sheets were reviewed by the Operations Support Manager who is SRO licensed, and were approved by a SRO licensed supervisor.

Based on the above information, TU Electric believes that the control room inventory requirement of Supplement 1 to NUREG 0737 (2) has been satisfied.

If you have any questions or require additional information, please contact either: Ralph Flores or Ray Ashley of the TU Electric staff; they can be reached by phone at (817) 897-5590 and (214) 812-8415, respectively.

Sincerely,

William J. Cahill, Jr.

William J. Cahill, Jr.

By: *Roger D. Walker*

Roger D. Walker
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RLA/vld

c - Mr. R. D. Martin, Region IV
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