

October 9, 1990

Docket Nos. 50-445  
and 50-446

Mr. William J. Cahill, Jr.  
Executive Vice President, Nuclear  
Texas Utilities Electric Company  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

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Dear Mr. Cahill:

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1&2 - COLD OVERPRESSURE  
MITIGATION SYSTEM (COMS) ACTUATION DURING ACCIDENT EVENTS (SDAR  
CP-88-30)

Your letter dated October 5, 1988 (TXX-88688) to the staff on this subject concluded that the postulated failure of the Cold Overpressure Mitigation System (COMS) during a Main Steam Line Break (MSLB) or Steam Generator Tube Rupture (SGTR) need not be considered because it would require a random, simultaneous, independent failure of a wide range temperature channel. In order for the staff to conclude on the adequacy of this position, you are requested to respond to the attached list of questions by December 14, 1990.

The staff does not consider this issue to be an immediate safety concern for Comanche Peak Unit 1 because it has a relatively low probability of occurrence, and because it is expected that the licensing basis limits will still be met, even if the COMS is postulated to actuate during MSLB and SGTR events.

The reporting requirements contained in this letter affect fewer than ten respondents; therefore, OBM clearance is not required under Public Law 96-511.

Should you have any questions regarding this request, please contact Mel Fields at (301) 492-1334.

Sincerely,

Original signed by

James C. Linville, Acting Director  
Project Directorate IV-2  
Division of Reactor Projects - III,  
IV, V and Special Projects

Enclosure:  
Information Request

cc w/enclosure:  
See next page

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Mr. William J. Cahill, Jr.

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cc w/enclosure:

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Honorable George Crump  
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Glen Rose, Texas 76043

STAFF QUESTIONS ON  
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2  
COMS ACTUATION DURING ACCIDENT EVENTS (SDAR CP-88-30)

The October 5, 1988 letter (TXX-88688) provides the rationale for why the actuation of the Cold Overpressure Mitigation System (COMS) during a Main Steam Line Break (MSLB) or Steam Generator Tube Rupture (SGTR) is not considered to be a credible event. The key to the staff's acceptance of this argument is assurance that the control room operators would be immediately aware of the existence of a failure in the COMS circuitry that would result in its actuation during a MSLB or SGTR event. To assist the staff in this regard, please provide the following information:

1. Provide a detailed failure analysis of the COMS that lists each component whose failure would result in the actuation of the COMS during a MSLB or SGTR, all possible failure modes of these components, and why each of these failures would be immediately noticed by the control room operators.
2. Human errors such as calibration mistakes must be considered in the failure analysis. Show why there cannot be any human errors that will go undetected by the control room operators during normal operating conditions that would result in COMS actuation during MSLB or SGTR events.
3. The possibility of wide range temperature instrument drift great enough to cause actuation of the COMS during a MSLB or SGTR event (but not great enough to arm the COMS during normal operating conditions; thereby alerting the operators) was discounted by the licensee as not being a credible failure mechanism. Provide a detailed justification for this position, including test data, if available, that demonstrates that these types of instruments will not drift appreciably between calibration intervals. Describe the calibration techniques used on these instruments and specify the time interval between calibration checks.