

TEXAS UTILITIES GENERATING COMPANY

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R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

September 13, 1982

Mr. Harold R. Denton
Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
WITHDRAWAL OF COMMITMENT TO MODIFY
DESIGN FOR BORON DILUTION CONCERNS

REF: (1) Letter from Robert A. Clark, Chief
Operating Reactors Branch #3, to
Dr. Robert E. Uhrig, Florida Power
and Light Company, dated April 26, 1982

Dear Mr. Denton:

In Amendment 14 to the Comanche Peak Steam Electric Station (CPSES) FSAR, a commitment was made to modify the Nuclear Instrumentation System to provide an alarm and mitigation scheme that provides additional protection against Boron Dilution Events. CPSES was a lead plant in pursuing resolutions to boron dilution concerns and met with the NRC Staff on several occasions to discuss this issue and the solutions proposed for CPSES. The CPSES design as described in the CPSES FSAR Sections 15.4.6 and 7.6.11 (and the CPSES Safety Evaluation Report Section 15.2.3.1) includes a commitment to modify the plant design to provide a flux doubling alarm, the automatic closure of valves to isolate dilution sources and the automatic opening to valves to supply borated water to the Reactor Coolant System.

These plant modifications represented a new design for which CPSES is a lead plant. This design requires the development, manufacture, qualification, and delivery of new hardware to CPSES. When the commitment was made to install these modifications (January 1981), it was with the understanding that the modifications were required to obtain a license and that the modifications could be made without adversely affecting the construction, testing and startup schedule for CPSES.

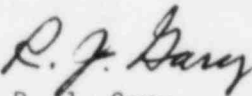
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Recently, CPSES has determined that hardware delivery dates have been delayed to the extent that the implementation of these modifications will have an impact on our hot functional testing and our estimated fuel load date. Recognition of this impact led to a re-evaluation of our commitment. The delivery dates, delayed in part due to the fact that CPSES is the first plant to make such modifications, have already been expedited as much as reasonably possible. As part of our re-evaluation, we have reviewed reference (1) which enclosed a revised position on inadvertent boron dilution.

Our re-evaluation of the boron dilution issue is not complete. However, we recognize that there is a serious line of logic that leads to the conclusion that plant modifications at CPSES to provide additional alarms or automatically mitigate boron dilution events are not justified. We will continue to review the validity of this logic.

For the present, however, CPSES is withdrawing the commitment to provide the flux doubling alarm and automatic valve operations, as described in CPSES FSAR Section 15.4.6 and 7.6.11, prior to initial fuel load. We feel that our delaying in the implementation of this commitment, as dictated by hardware delivery problems, is fully justified using the same logic provided by the NRC Staff in the enclosure to reference (1). A reasonable installation date for these modifications or a proposal to delete this commitment completely will be provided later.

Respectfully,


R. J. Gary

RJG:kp