



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 23 AND 9 TO
FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89
TEXAS UTILITIES ELECTRIC COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated May 21, 1993, Texas Utilities Electric Company (the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License Nos. NPF-87 and NPF-89) for the Comanche Peak Steam Electric Station, Unit Nos. 1 and 2 (CPSES). The proposed changes would revise Technical Specification (TS) 3/4.7.7 and its associated Bases by replacing the requirements associated with the control room heating and ventilation (HVAC) system with requirements related to the control room emergency filtration/pressurization system (CREFS) and control room air conditioning system (CRACS). The proposed changes are consistent with the requirements of the improved Westinghouse Standard Technical Specifications (STS) (NUREG-1431) issued on September 28, 1992.

The control room HVAC system at CPSES is the control room air conditioning and emergency filtration/pressurization system which is shared by Units 1 and 2. The system is required to be operable during all modes of operation. The current limiting condition for operation (LCO) allowed outage time unduly restricts the ability to perform scheduled preventive maintenance and normally occurring corrective maintenance. This restriction could result in the simultaneous shutdown of both units due to the loss of one-out-of-four air conditioning units.

In the present TS 3/4.7.7, the requirements for the control room HVAC system are divided into two specifications based on the units' operating MODE. In MODES 1, 2, 3, and 4, TS 3/4.7.7.1 applies; for MODES 5 and 6, TS 3/4.7.7.2 applies.

The proposed changes will separate the requirements into two specifications based on system function. TS 3/4.7.7.1 will address the filtration/pressurization aspects of the control room HVAC system and TS 3/4.7.7.2 will address air conditioning. In addition to the six operating MODES in the present TS, the revised TS will also include an applicability statement for the movement of irradiated fuel assemblies.

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In the proposed revision, a new specification for the CRACS is provided and the existing specifications are essentially transferred to the CREFS except for some minor changes to be consistent with NUREG-1431.

The additional information contained in the supplemental letter dated February 23, 1994, was clarifying in nature and, thus, within the scope of the initial Federal Register notice and did not affect the staff's proposed no significant hazards consideration determination.

2.0 EVALUATION

The action statement for the emergency filtration/pressurization functions while in MODES 1, 2, 3, and 4 remains unchanged in the proposed revision. For the heating and cooling functions, the existing action statement is changed from an allowed outage time (AOT) of 7 days to an AOT of 30 days, and a new plant specific action statement is added. The new action statement provides the requirements and AOT (30 days) when each train is capable of 50 percent of its capacity, but neither is capable of providing 100 percent of the required heating and cooling. The 30 days is acceptable because it takes into account the fact that following a loss of the CRACS, temperature changes are gradual, dependent upon outside temperature, and time is available for manual actions that can alleviate the loss of CRACS. Therefore, the AOT should be longer than the AOT for the CREFS since, unlike the loss of CRACS, there are no actions that can be taken to effectively alleviate the conditions resulting from a loss of all filtration/pressurization capability following a loss-of-coolant accident (LOCA). The 30-day AOT is also consistent with the Westinghouse STS (NUREG-1431). These times are also acceptable for the plant specific design feature (each train consists of two 50 percent capacity air handling units) because under these conditions the system is less susceptible to a single failure (50 percent is always available) and the same manual actions are available to compensate for a complete loss of CRACS.

The action requirement for the CREFS while in MODES 5 and 6 with one train inoperable has been changed to add a new alternative action which may be taken following the AOT. The new alternative action is to suspend core alterations and the movement of spent fuel assemblies. This is an acceptable alternative because the function of the CREFS during these modes is to protect against a fuel handling accident. For two CREFS trains inoperable, the action requirement has also been changed to suspend core alterations and the movement of irradiated fuel assemblies. The previous action requirement was to suspend all operations involving core alterations or positive reactivity changes and included a requirement that this action was also to be taken in the event that the only operable HVAC train could not be powered by an operable emergency power supply. The deletion of the requirement to suspend the handling of irradiated fuel assemblies (suspension of core alterations already exists) effectively addresses this concern. The CREFS is not related to the capability to prevent or mitigate a criticality accident due to positive reactivity addition. Separate controls are provided to address positive reactivity changes and the prevention of criticality. It is also acceptable that the operability of the CREFS not be tied to the capability of its being

powered by an onsite emergency power supply. Action requirements already exist in the specifications to address an inoperable emergency diesel generator and a loss of offsite power is not likely to initiate a fuel handling accident and vice versa.

The action requirements for the CRACS while in MODES 5 and 6 with one train inoperable (or each train only capable of 50 percent) has an AOT of 30 days and following the AOT, an alternative action to suspend core alterations and the movement of irradiated fuel assemblies has been added. This same alternative action is required when both trains of CRACS are inoperable. These changes are acceptable for the same reasons identified previously for the CRACS in MODES 1 through 4 and for the CREFS in MODES 5 and 6. These changes are also consistent with NUREG-1431.

The existing surveillance requirements for the CREFS filters have been brought forward in lieu of a statement that the filters will be tested in accordance with the ventilation filter testing program as specified in NUREG-1431. Some minor changes to the rest of the surveillance requirements have also been made to make them consistent with NUREG-1431. A surveillance requirement has also been added for functional testing of the CRACS. The staff has reviewed the proposed surveillance requirements and conclude they are acceptable because the frequency and methods of testing are similar to other safety-related systems and are consistent with the requirements in NUREG-1431.

The proposed changes include all related requirements of NUREG-1431, Rev. 0. The staff has concluded that this proposed change satisfies the requirements of the Commission's Final Policy Statement on Technical Specification Improvement (58 FR 39132). The staff is considering this change as a potential line-item improvement of the Standard Technical Specifications.

Based on its evaluation as described above, the staff concludes that the proposed technical specification change to divide the requirements for the control room HVAC into two specifications based on system rather than operating modes provides more flexibility and adds a level of safety with the addition of a surveillance requirement for the heating and cooling function of the system. The existing TS has no requirement for testing the heating and air conditioning function. The staff, therefore concludes that the proposed changes to TS 3/4.7.7 are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (5 FR 43933). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the consideration discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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