

Log # TXX-90359
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909.5
Ref. # 10CFR50.55(e)
10CFR21

William J. Cahill, Jr.
Executive Vice President

December 13, 1990

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
DIESEL GENERATOR STARTING AIR RECEIVER TANK RELIEF VALVES
SDAR: CP-90-02 (SUPPLEMENTAL REPORT FOR UNIT 1)
(INTERIM REPORT FOR UNIT 2)

REF: Samuel J. Collins letter to W. J. Cahill, Jr., dated August 31, 1990

Gentlemen:

On March 7, 1990, TU Electric submitted TXX-90064 providing results of an evaluation performed on several deficiencies associated with relief valves on Emergency Diesel Generator (EDG) air start system receiver tanks. The referenced letter transmitted NRC Inspection Report 50-445/90-26; 50-446/90-26. Within this report, the NRC stated their perception that TXX-90064 did not address the deficiency in these valves that resulted in excessively low blowdown pressure. The NRC also stated that, "the installed valves do not present an operability concern...[however,] pending scheduled replacement activities, including an updated final response letter, this construction deficiency remains open." The purpose of this letter is to provide the requested updated response letter.

As discussed in TXX-90064, TU Electric performed an evaluation for safety significance of the potential for unexpected lifting of EDG air start receiver relief valves due to mechanical shock/seismic acceleration. Since there is no common mode failure mechanism to lift multiple relief valves, the subsequent failure of the relief valve to reseal before a blowdown pressure less than the EDG air start signal lockout pressure was reached is not a safety problem. Although not explicitly discussed in TXX-90064, this deficiency therefore did not adversely affect the safe operations of Unit 1 and was not reportable per 10CFR50.55(e).

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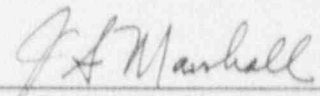
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TU Electric has been advised by the vendor that ASME Section III qualified replacement relief valves are being made available to the industry. Although there is no safety significance associated with continued use of the relief valves currently installed in CPSES Unit 1, TU Electric intends to enhance its design and resolve the non-reportable deficiency by installing the qualified relief valves in Unit 1 on a schedule consistent with their procurement and plant conditions and in Unit 2 prior to Unit 2 fuel load. Due to industry demand for these valves a procurement date has not been established.

The safety significance of the deficiency for Unit 2 will be evaluated prior to Unit 2 fuel load.

Sincerely,

William J. Cahill, Jr.

By: 
J. S. Marshall
Generic Licensing Manager

MCP/cld

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)