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 Ref. # Generic Letter 90-06  
 Generic Letter 89-10

William J. Cahill, Jr.  
 Executive Vice President

December 21, 1990

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
 DOCKET NOS. 50-445 AND 50-446  
 RESPONSE TO GENERIC LETTER 90-06 RESOLUTION OF GENERIC  
 ISSUE 70, "POWER-OPERATED RELIEF VALVE AND BLOCK VALVE  
 RELIABILITY," AND GENERIC ISSUE 94, "ADDITIONAL  
 LOW-TEMPERATURE OVERPRESSURE PROTECTION FOR LIGHT-WATER  
 REACTORS," PURSUANT TO 10CFR50.54(f)

Gentlemen:

Generic Letter 90-06, dated June 25, 1990, requested that PWR licensee and construction permit holders advise the NRC staff of the current plans relating to PORVs, PORV block valves and low temperature overpressure protection and, in particular, whether TU Electric intends to follow the staff positions included in Enclosures A and B as applicable or propose alternative measures.

The recommendations of Generic Letter 90-06, respective responses, and schedule for completion are listed in the attachment.

Sincerely,

William J. Cahill, Jr.

JLR/grp  
 Attachment

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

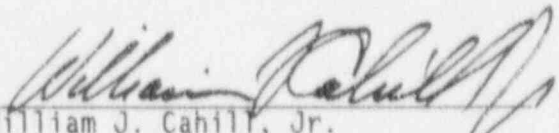
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
Texas Utilities Electric Company ) Docket Nos. 50-445  
(Comanche Peak Steam Electric ) 50-446  
Station, Units 1 & 2) )

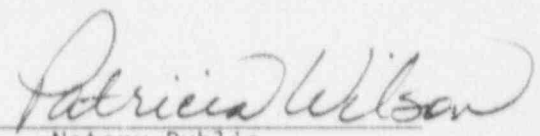
AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Executive Vice President, Nuclear of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Generic Letter 90-06; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
William J. Cahill, Jr.  
Executive Vice President, Nuclear

STATE OF TEXAS )  
COUNTY OF SOMERVELL )

Subscribed and sworn to before me, a Notary Public, on this 21st day of December, 1990.

  
Notary Public



I. IMPROVEMENTS TO ALL PORVs AND BLOCK VALVES

Section 3.1 of Enclosure A to Generic Letter 90-06 - Actions to be taken based on analysis and findings for GI-70:

- Position 1. Include PORVs and block valves within the scope of an operational quality assurance program that is in compliance with 10 CFR Part 50, Appendix B. This program should include the following elements:
- a) The addition of PORVs and block valves to the plant operational Quality Assurance List.
  - b) Implementation of a maintenance/refurbishment program for PORVs and block valves that is based on the manufacturer's recommendations or guidelines and is implemented by trained plant maintenance personnel.
  - c) When replacement parts and spares, as well as complete components, are required for existing non-safety-grade PORVs and block valves (and associated control systems), these items may be procured in accordance with the original construction codes and standards.

Response:

- a) The pressurizer PORVs and block valves for CPSES are included in the Quality Assurance List as delineated on FSAR Table 17A-1, "List of Quality Assured Structures, Systems and Components." This classification subjects these valves to the most stringent requirements of our Quality Assurance program.
  - b) The maintenance procedures for the PORVs and block valves for CPSES are all based on the respective manufacturer's guidelines and are implemented by trained plant personnel.
  - c) Replacement parts and spares, as well as complete components, are procured in accordance with CPSES procedures for safety related items. No change to the existing program is required.
- Position 2a. Include PORVs, valves in PORV control air systems, and block valves within the scope of a program covered by Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants," of Section XI of the ASME Boiler and Pressure Vessel Code.

Response:

The PORVs, air accumulator check valves, and block valves for CPSES are included in the IST program. While not specifically addressed in the IST program, the air solenoids are an integral part of the PORV control circuit and proper functioning is assured by the successful completion of the PORV surveillance.

I. IMPROVEMENTS TO ALL PORVs AND BLOCK VALVES (Continued)

Section 3.1 of Enclosure A to Generic Letter 90-06 - Actions to be taken based on analysis and findings for GI-70:

Position 2b. Stroke testing of PORVs should only be performed during Mode 3 (HOT STANDBY) or Mode 4 (HOT SHUTDOWN) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. Stroke testing of the PORVs should not be performed during power operation.

Response:

CPSES PORVs are included in the Section XI Program and are stroke tested during cold shutdown as required by the Code. PORVs are not stroke tested during power operation.

Position 2c. Additionally, the PORV block valves should be included in the licensee's expanded MOV test program discussed in NRC Generic Letter 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance," dated June 28, 1989.

Response:

The PORV block valves have been added to the Generic Letter 89-10 MOV test program.

Position 3. For operating PWR plants, modify the limiting conditions of operation of PORVs and block valves in technical specifications for Modes 1, 2, and 3 to incorporate the position adopted by the staff in recent licensing actions, (Attachments A-1, A-2 and A-3 of the Generic Letter).

Response:

TU Electric will submit an amendment request to modify the current Technical Specification Limiting Conditions of Operation to fully comply with those proposed by the Generic Letter for PORV and block valve reliability (Attachment A-1 for Westinghouse Plants with two PORVs).

II. IMPROVEMENTS IN PROTECTION SYSTEM AVAILABILITY

Section 3 of Enclosure B to Generic Letter 90-06 - Action to be taken for GI-94:

Position 3. Revise current Technical Specifications for Overpressure Protection to reduce allowable outage time (AOT) for a single channel from 7 days to 24 hours when the plant is in Modes 5 or 6, (see Attachment B-1 to the Generic Letter).

## II. IMPROVEMENTS IN PROTECTION SYSTEM AVAILABILITY (Continued)

### Section 3 of Enclosure B to Generic Letter 90-06 - Action to be taken for GI-94:

#### Response:

The CPSES cold overpressure technical specification currently allows the use of either PORVs or RHR suction relief valves for relief protection. Although this configuration is acknowledged by the Generic Letter, a sample specification for this configuration was not provided. A revised Technical Specification which reflects this configuration will be proposed, and will adopt a 24 hour allowed outage time when only one Cold Overpressure Protection device is available in Modes 5 or 6.

This revised technical specification will also include the option of having at least 1 PORV and 1 RHR suction relief valve operable during Modes 4, 5 and 6 when the reactor vessel head is on and the RCS is not vented through a 2.98 square inch or larger vent. We believe these approaches fully meet the intent of the Generic Letter.

TU Electric cooperated with six other utilities in developing a common approach to this action item of Generic Letter 90-06. A joint effort was possible due to the similarity of plant types and technical specifications. These plants are all Westinghouse PWRs which utilize the PORVs and RHR suction relief valves for low-temperature overpressure protection.

Also, CPSES has in place administrative controls that provide restrictions for: 1) the restart of an idle reactor coolant pump (Technical Specification 3.4.1.3 and 3.4.1.4.1) and 2) the number of high pressure safety injection pumps and charging pumps allowed to be operable when LTOP is required (Technical Specifications 3.1.2.2, 3.1.2.3 and 3.5.3.2). These administrative controls provide additional assurance of proper pressure control during low temperature conditions.

## III. SCHEDULE

### Generic Letter 90-06 Action:

For PWR plants with an operating license, staff positions 1, 2 and 3 in Section 3.1 of Enclosure A and staff position 3 in Section 3 of Enclosure B should be implemented by the end of the first refueling outage that starts 6 months or later from the date of the Generic Letter.

For PWR CP holders, staff positions 1 and 2 in section 3.1 of Enclosure A should be implemented before initial criticality or within 6 months of the date of the Generic Letter, whichever is later. The technical specification modifications in staff position 3 in Section 3.1 of Enclosure A and in Section 3 of Enclosure B should be submitted by the end of the first refueling outage that starts 6 months or later from the date of the Generic Letter.

III. SCHEDULE (Continued)

Generic Letter 90-06 Action:

If the licensees and the CP holders commit to implement these recommended technical specifications, it is requested that they submit modifications to their current technical specifications in a license amendment in accordance with the schedule noted above.

Response:

Proposed Technical Specification changes for Unit 1 will be submitted by the end of the first refueling outage, which is currently scheduled for September 1991. Because refueling outage start dates are fluid, this date is approximate.

All changes required for Unit 2 will be implemented before fuel load.