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TUELECTRIC

William J. Cahill, Jr.
Group Vice President

May 31, 1994

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
BIENNIAL REVIEW OF PLANT PROCEDURES

Gentlemen:

In accordance with the requirements of 10CFR50.54(a)(3), TU Electric requests approval of the attached revision to the FSAR description of the biennial review of safety related plant procedures, which is part of the previously accepted CPSES quality assurance program. Since this revision may be considered to be a reduction in quality assurance commitment, NRC approval is required prior to implementation of the changes.

TU Electric believes that the intent of the biennial review is accomplished by other CPSES controls which make the biennial review redundant and as such the biennial review represents an unnecessary expenditure of CPSES management and staff resources which does not produce an overall safety benefit. Consistent with recent NRC and industry initiatives to reduce regulatory burden, TU Electric proposes to modify its commitment to perform biennial reviews as described in the attachments to this letter.

Attachment 1 provides a mark-up of the affected FSAR pages. Attachment 2 provides a description of the changes, the reason for the changes, and the basis for concluding that the revised program continues to satisfy the quality assurance program commitments previously accepted by the NRC.

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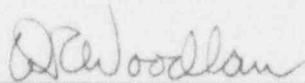
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If there are any questions, please contact Mr. Bob Dacko at (214) 812-8228. In accordance with 10CFR50.54(a)(3)(iv), CPSES plans to implement these changes following receipt of an NRC letter indicating acceptance or 60 days after the date the submittal.

Sincerely,

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

By: 
D. R. Woodlan
Docket Licensing Manager

BSD
Attachments

c - Mr. L. J. Callan, Region IV
Mr. T. A. Bergman, NRR
Mr. T. Reis, Region IV
Resident Inspectors, CPSES (2)

CPSES/FSAR

Discussion

The CPSES design complies with the recommendations of Revision 3 (4/78) of this regulatory guide except as follows:

- a. The acceptable alternative methods of FSAR Subsection 6.1B.1.1.3 are used.
- b. The recommendations of Revision 1 (6/73) or Revision 2 (5/77) of this regulatory guide are used.
- c. The exception described in Subsection 6.1B.1.1.4.

Also refer to Appendix 1A(N).

Regulatory Guide 1.32

Criteria for Safety-Related Electric Power Systems for Nuclear Power Plants

Discussion

The CPSES design complies with the requirements of Revision 2 (2/77) of this regulatory guide. For details see Section 8.3.

Regulatory Guide 1.33

Quality Assurance Program (Operation)

Discussion

Q421.19
Q212.138
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Q421.19
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~~The quality assurance requirements for the operations phase of CPSES is in compliance with Revision 2 (2/78) of this regulatory guide.~~

~~The quality assurance requirements of this regulatory guide will be implemented per the provisions of ANSI N18.7-1976, "Administrative~~

CPSES/FSAR

~~Controls and Quality Assurance for the Operational Phase of Nuclear
Power Plants".~~

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~~Also refer to Sections 17.1 and 17.2.~~

Regulatory Guide 1.34

Control of Electroslag Weld Properties

Discussion

Refer to Appendix 1A(N).

Regulatory Guide 1.35

Inservice Inspection of UngROUTED Tendons in prestressed Concrete
Containment Structures

Discussion

This regulatory guide is not applicable to the CPSES which has a
steel-lined, reinforced concrete containment structure.

Regulatory Guide 1.36

Nonmetallic Thermal Insulation for Austenitic Stainless Steel

Discussion

This regulatory guide is not applicable for components located inside
CPSES Containment Buildings, since only stainless steel metal
reflective thermal insulation is used for austenitic stainless steel
components located there. Nonmetallic thermal insulation used for
austenitic stainless steel piping and components located outside the

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The quality assurance requirements for the operations phase of CPSES are in compliance with Revision 2 (2/78) of this regulatory guide as implemented by ANSI N18.7-1976, "Administrative Controls and Quality Assurance for Operational Phase of Nuclear Power Plants", except for the requirement to perform biennial reviews of plant procedures.

The intent of the biennial review is accomplished by other CPSES programmatic controls already in place. The controls assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, regulatory requirements, industry experience and other conditions that may impact plant procedures.

In addition, biennial reviews are performed of non-routine procedures (Emergency Response guidelines (ERGs), Functional Restoration Guidelines (FRGs) and Abnormal Plant Operating Procedures (ABNs)).

PROPOSED ALTERNATIVE TO THE ANSI N18.7 BIENNIAL REVIEW

CPSES is committed to Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operational)." RG 1.33 endorses ANSI N18.7-1976/ANS 3.2, "Administrative Controls and Quality Assurance for Operational Phase of Nuclear Power Plants," which contains a requirement that all safety related procedures be reviewed no less frequently than every two years. RG 1.33 allows licensees to propose, for staff review and approval (prior to implementation), acceptable alternative methods for complying with the biennial review requirement. In lieu of performing a biennial review of all safety related procedures, TU Electric proposes to: 1) take credit for programmatic controls already in place, and 2) continue performing biennial reviews of non-routine procedures (Emergency Response Guidelines (ERGs), Functional Restoration Guidelines (FRGs), and Abnormal Plant Operating Procedures (ABNs)). Emergency Response Plan and Security Plan implementing procedures are reviewed in accordance with the requirements of 10CFR50.54(t) and 10CFR50.54(p)(3) respectively. The basis for this proposed alternative is discussed below.

ANSI N18.7, Section 5.2.15, prescribes a biennial review of each safety-related plant procedure "to determine if changes are necessary or desirable". The biennial review is intended to ensure that plant operating experience, industry experience and recent technical information, are factored into plant procedures. TU Electric considers the requirement to maintain procedures in an accurate and useful condition to be a dynamic process. As such, numerous programmatic controls have already been established at CPSES that accomplish the underlying intent of the biennial review. These controls assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, vendor recommendations, regulatory requirements, corrective actions, industry experience and other conditions that may impact plant procedures. The controls are sufficiently responsive to ensure that required procedure changes are timely and accurate, regardless of how frequently those procedures are used. Performing biennial reviews in addition to these controls is redundant and it imposes a significant drain on plant resources.

Described below are programmatic controls already in place which require an assessment of the impact on plant procedures:

o Site Modification Process

The plant design modification program requires an interface review of all modifications by groups which are potentially affected by the modification. This interface review requires that all procedures potentially affected by the modification be identified and changes or revisions made as necessary.

o Corrective Action Program

CPSES personnel are required to identify and document conditions found to be adverse to quality, safety and plant reliability. Should inadequate procedures be identified requiring corrective action, they are promptly changed or revised.

o Off-Normal Occurrence

Criteria have been established to investigate events which occur at the station and are considered to be outside normal expected operation, including severe or unusual plant transients, safety system malfunctions or improper operations; major equipment changes; events involving nuclear safety or plant reliability; deficiencies in design, analysis, operations; maintenance procedures or training that cause a significant events; fuel handling or storage event, excessive radiation exposure or severe personnel injury; and excessive discharge of radioactivity. Corrective action for these events require appropriate procedures to be reviewed and necessary changes or revisions performed.

o User Feedback and Procedure Compliance

All CPSES personnel are required to notify supervision or management concerning procedural guidance which cannot or should not be followed. The procedure is evaluated, and if required, changed prior to the commencement or continuation of work.

o Operating Experience Review

CPSES is an active participant in the Significant Evaluation and Information Network (SEE-IN) program. The Nuclear Overview department provides the necessary instruction for evaluating material from the SEE-IN program (e.g., Significant Event Reports (SERs), Operations and Maintenance Reminders (O&MRs)) and for disseminating such information to plant personnel. This evaluation includes the review of applicable procedures. Recommendations are made to resolve underlying problems and implementation may include changes to plant procedures. Internal and external effectiveness reviews are performed to ensure the program is maintained.

o Vendor Technical Information

Administrative procedures governing the Vendor Equipment Technical Information Program (VETIP) provide control of incoming equipment technical information and assure the appropriate engineering/technical evaluation and distribution for the following:

- prompt attention to key personnel

- timely incorporation into maintenance or operating procedures, equipment data/purchasing records and training programs
- future procedure reviews and revision cycles.
- o Licensed Document Change/50.59 Evaluation

Changes to licensing documents require an evaluation for impact on procedures and may result in procedure changes as required

All proposed changes to the facility or procedures and any new test or experiment that have a potential to affect, either directly or indirectly, nuclear safety are reviewed for impact on procedures.
- o Commitment Tracking System (CTS)

The CTS program at Comanche Peak Steam Electric Station is a comprehensive system governed by administrative control utilized to insure that commitments/requirements are tracked, included, and maintained in appropriate implementing procedures. Correspondence to and from regulatory agencies is reviewed for commitments for inclusion in the CTS. Any change to source criteria is updated and evaluated against the implementing procedures. The need for change or revision is then determined and, if applicable, accomplished by the appropriate department/group.
- o Trending

CPSES continues to trend data from groups/areas such as Operations, Maintenance, Overview, Licensing, Engineering and Health and Safety. The trend process includes the collection of trend data which is indicative of the data, and identification of follow-up action necessary to improve that performance. Trending follow-up action for adverse trends may result in procedure changes and improvements.
- o Infrequently Performed Evolutions

Infrequently performed evolutions as well as high risk activities require a pre-activity briefing. This briefing discusses with the involved personnel the procedures that govern the evolution, and consideration is given to plant procedure walkdowns. Should inadequacies be identified in procedures; they would be corrected prior to the performance of the evolution.
- o Requalification Training

Licensed operator training, as well as non-licensing operator training and technical staff training programs, frequently utilize procedures. Resolution of noted discrepancies would result in procedure revisions.

o Quality Assurance Activities

The Quality Assurance Program currently includes a review of procedures as part of its audit and surveillance process. These processes utilize methodology that routinely ensure adequacy of procedures and effectiveness of the procedure revision program.

CPSES has completed two biennial reviews since Unit 1 became operational. The results of these reviews have confirmed the effectiveness of the existing programmatic controls and support the position that a biennial review of all safety related procedures is not necessary.

TU Electric is aware that the NRC has provided additional guidance with regard to proposed alternatives to the ANSI 18.7 biennial review. The NRC guidance recommends that: 1) a biennial audit be performed of a representative sample of routine procedures which are used more frequently than every two years, and, 2) routine procedures which have not been used in the previous two years, be reviewed prior to use. It is TU Electric's position that the biennial audits already being performed to satisfy Technical Specification Section 6.5.2.8d (i.e., audits performed to verify compliance with criterion V of 10CFR50 Appendix B) meet the intent of biennial audit recommended by the NRC. These audits performed in the maintenance, operations, engineering and plant support areas, verify the acceptability of procedures and verify that the procedure review and revision process is effectively implemented. In addition, TU Electric believes that the programmatic controls described above ensure that all safety related procedures are maintained current, regardless of how frequently they are used. Thus, the review prior to use of infrequently used routine procedures is unnecessary.

The proposed changes to the biennial review requirements may be considered to be a reduction in a quality assurance commitment in that not all procedures will be reviewed biennially. However, the programmatic controls described above are part of a dynamic process that assure that procedures are maintained in an accurate and useful condition consistent with the safety goals of the RG 1.33/ANSI N18.7 requirements.