TEXAS UTILITIES SERVICES INC.

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March 18, 1983

Director of Nuclear Reactor Regulation Attention: Mr. B. J. Youngblood, Chief Licensing Branch No. 1 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION DOCKET NOS. 50-445 AND 50-446 ALTERNATE SHUTDOWN REACTOR SHUTDOWN

REF: (1) TXX-3515 of May 7, 1982 entitled, "Comanche Peak Steam Electric Station Alternate Shutdown"

Dear Sir:

When shutdown of Comanche Peak Steam Electric Station (CPSES) is being established or maintained, one of the tasks that must be assured is reactor shutdown. For normal operation, reactor power can be monitored in the control room. For remote shutdown, repeaters for two source range (SR) channels are provided on the Hot Shutdown Panel (HSP) to verify reactor shutdown. For a fire in the control room or cable spreading room, both of these SR channels will probably not be lost but their availability cannot be guaranteed.

For alternate shutdown at CPSES (fire in the cable spreading or control room), reactor shutdown is verified by checking rod position, boron concentration, and reactor coolant system (RCS) temperature and by assuring that boron dilution will not occur. Rod position can be verified by locally checking that the Reactor Trip Switchgear is tripped. Boron concentration is known initially and, per Technical Specifications, must be verified within one hour and at least once per 12 hours thereafter, when SR indication is lost. RCS temperature indication is available at the HSP for Alternate Shutdown. Boron dilution is discussed in the CPSES FSAR Section 15.4.

For alternate shutdown, RCS makeup is from the Boric Acid Tanks via the Chemical and Volume Control System. Borated water is supplied directly to the suction of the Centrifugal Charging Pumps (via the

8303220387 830318 PDR ADOCK 05000445 F PDR Boric Acid Transfer Pumps and valve 1-8104 which is de-energized and manually repositioned - see reference 1). The only path for diluted makeup to the RCS will be closed off by closing two manual valves, ICS-8430 and ICS-8453. Boron dilution is a slow process and even under the worst possible dilution scenario, nearly 30 minutes are available to stop the dilution before the event is of concern. Even though this scenario is highly improbable, the procedures for alternate shutdown will require that these valves be closed within 30 minutes after the decision to switch control to the Alternate Shutdown Systems. In addition, isolation shall be maintained for the dilution paths until reliable control of the blending system has been restored.

From this discussion it can be seen that the design and procedures at Comanche Peak Steam Electric Station will adequately assure reactor shutdown throughout the duration of a cable spreading room or control room fire scenario.

Respectfully,

H. C. Schmidt

DRW:tls