TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER DALLAS, TEXAS 75201-3050

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February 23, 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 ENVIRONMENTAL QUALIFICATION AUDIT

ACCOUNTING FOR POST-ACCIDENT OPERABILITY

Dear Sir:

For safety related electrical equipment which does not see an adverse temperature after a design basic accident, but is still located in a harsh environment, the EQB has required that post-accident operability be addressed through accelerated aging. If post-accident operability had not been previously accounted for by accelerated aging, the required post-accident operability period must be subtracted from the qualified life.

The safety related electrical equipment has been reviewed against this requirement. The requirement was considered satisfied or not applicable if the following criteria was met:

- \* The equipment is in a mild environment
- \* The equipment experiences an adverse temperature following a design basis accident
- \* The equipment has been qualified to LOCA or MSLB accident conditions
- \* The qualified life for the equipment is based on a temperature which exceeds the postulated average ambient temperature for CPSES by at least  $10^{\rm O}{\rm F}$
- \* The qualified life for the equipment is at least 40 years.

The only qualification package that was in conflict with this requirement was AE-2, Large Pump Motors, as supplied and qualified by Westinghouse. The qualified life for these motors was recalculated using existing test data and this new requirement. The new calculations revealed that adequate accelerated aging had been completed to account

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for a five year qualified life and one year of post-accident operability. The qualification documentation has been revised to reflect these new values.

One qualification package (MS616, Differential Pressure Switches), for which the qualification report has not been received, is expected to be acceptable since the package is being qualified to a 40 year qualified life. If the package does not get approved with a qualified life of 40 years, the EQB requirement considered by this letter will be specifically addressed.

The review and resolutions discussed above places CPSES in compliance with this EQB requirement and closes this concern.

Respectfully,

H. C. Schmidt

DRW:tls