

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

MICHAEL D. SPENCE
PRESIDENT

July 16, 1984
TXX #4222
File #10115

Mr. John T. Collins
Regional Administrator
USNRC Division of Inspection and
Enforcement, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOs. 50-445 and 50-446
RESPONSE TO IE BULLETIN 84-02

Dear Mr. Collins:

The following information is given in response to IE Bulletin 84-02, "Failures of General Electric Type HFA Relays in Use in Class IE Safety Systems". The bulletin contains four specific action items and requests that the general concerns be reviewed for applicability.

ACTION ITEM ONE:

The item reads:

"Plants in Operation

- a. Develop plans and schedules for replacing (1) nylon or Lexan coil spool-type HFA relays used in normally energized safety-related* applications and (2) nylon coil spool-type HFA relays used in normally de-energized safety-related applications. The replacement relays and any replacements made in the future should meet the requirements of the applicable IEEE standards. The replacement program for energized and de-energized relays should be performed on a "best efforts" basis during plant outages of sufficient duration. The entire replacement program should be completed within two years from the date of this bulletin.

*For the purpose of the applicable actions of this bulletin, "safety-related" constitutes those systems covered by the definition given in 10 CFR Part 100, Appendix A, Sections III.(c) (1), III.(c) (2) and III.(c) (3). In assessing the impact of Lexan/Nylon coil spool-type HFA relay in other systems at their facilities, licensees should consider the provisions of GDC 1 to 10 CFR Part 50, Appendix A.

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The replacement schedule should consider the following recommended priority:

Nylon or Lexan normally energized in the reactor trip system

Nylon or Lexan normally energized in other safety-related applications

Nylon normally de-energized in the reactor trip system

Nylon normally de-energized in other safety-related applications

- b. During the period before relay replacement, develop and implement surveillance plans that include:
- (1) Monthly functional tests of all reactor trip system normally energized relays that verify relay contacts change state when the relay coil is de-energized;
 - (2) Visual inspections of all safety-related normally energized relays as soon as practical upon receipt of this bulletin. Thereafter, similar inspections should be accomplished in conjunction with the monthly functional test. These visual inspections should verify that relay coils are not deteriorating (e.g., inspect coil bobbins for visible cracks or melting), and should confirm cleanliness of the relay pole pieces.
- c. Provide a basis for continuing operation for the period of time until the normally energized relays are replaced. This basis should include a discussion of those measures addressed in items 1a and 1b and any other preventive and/or corrective measures taken or planned.
- d. Provide a written report of the above actions, including schedules for completion. This report is to be submitted to the NRC within 120 days of receipt of this bulletin."

Response:

Action item one is directed toward plants in operation. This item is, therefore, not applicable to CPSES.

ACTION ITEM TWO

This item reads:

"Plants Under Construction

- a. Provide plans and schedules for replacing both normally energized and normally de-energized HFA relays as specified by this bulletin in item 1a which are used in safety-related systems at your facility(ies). Your schedule shall ensure that these relays are replaced before the scheduled date for OL issuance or within two years from the date of

this bulletin, whichever is longer. If these relays are not planned to be replaced before OL issuance, item 1b shall be implemented at the time of license issuance and a response to item 1c is required.

- b. Provide a written report of the actions specified in item 2a. This report is to be submitted to the NRC within 120 days of receipt of this bulletin."

Response:

Action item two is directed at plants under construction. This is not applicable at CPSES because GE type HFA relays are not used in safety-related systems. The basis for this conclusion is discussed after item three under the heading, "Basis".

ACTION ITEM THREE

The item reads:

"If your plant does not use or plan to use the nylon or Lexan-type GE HFA relays in the safety-related systems discussed above, a negative response is requested within 120 days of receipt of this bulletin, and no further action is required."

Response:

Action item three is directed at plants which do not use or plan to use nylon or Lexan-type GE type HFA relays in safety-related systems, and thus is applicable at CPSES. GE type HFA relays are not utilized in the reactor trip system or any other safety-related system and are not planned for use.

BASIS

All safety-related, Class 1E, auxiliary relays were specified in the original equipment specifications to be environmentally qualified to the requirements of IEEE 323-1974, IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations, and IEEE 344-1975, IEEE Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations. The qualification documentation for all Class 1E equipment was researched for GE type HFA relays. No HFA relays were found. On the basis of this research, the determination was made that no type HFA relays are utilized in safety-related applications, nor will they be used in the future.

ACTION ITEM FOUR

This item reads:

"If your plant uses or plans to continue to use the nylon or Lexan-type HFA relay in systems other than those safety-related applications defined

in this bulletin, then the appropriate administrative controls dealing with maintenance, storage and handling of spare parts at your facility must be revised to ensure that the older and problematic HFA relay coils are not inadvertently used as a replacement part in safety-related applications in future maintenance efforts at your facility(ies)."

Response:

Action item four is directed at plants which utilize GE type HFA relays in systems other than safety-related applications defined in the bulletin. This item is applicable at CPSES because GE type HFA relays are used in non-safety related systems. Existing maintenance and parts control procedures do provide assurance against inadvertent use of problematic relay coils in any safety-related auxiliary relay.

GENERAL CONCERN

The general concern is directed at generic safety-related electrical auxiliary applications. The concern reads:

"Although the specific details involving the identified relay failures described above may not directly apply to your facility(ies), you are asked to review the general concerns expressed in the bulletin for applicability at your facility(ies). For example, if a different type of relay is used for the same safety functions described in this bulletin, or relays with similar materials are used for other safety-related functions, past operating history and the manufacturer's recommendations should be reviewed to determine if additional action is appropriate. Your response should describe the results of the review, and, if the general concerns apply, you should describe the short-term and long-term corrective actions to be taken and the schedules thereof."

Response:

The general concern is not applicable. The basis for this determination is that all CPSES safety-related Class 1E auxiliary relays have been qualified to the requirements of IEEE 323-1974 and IEEE 344-1975. The results of type tests and analyses performed pursuant to these standards provide assurance that all safety-related relays can perform their safety-related functions during qualified life. Additionally, no generic safety-related relay problems have been identified through the Startup Test Deficiency Report or Operations QA Non-conformance Report trend analysis programs.

Should you have additional questions concerning this matter, please contact the office of the Vice President, Nuclear Operations.

Mr. John T. Collins
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To the best of my knowledge, information, and belief, the matters set forth herein are true and correct.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael D. Spence".

M. D. Spence
President

MDS/kh

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

The foregoing response has been subscribed and sworn to before me, a Notary Public in and for Titus County, on this 16 day of July, 1984.



[Handwritten Signature]
Notary Public

My commission expires 2/13/85.