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 Ref. # 10CFR50.92

TU ELECTRIC April 6, 1992

William J. Cahill, Jr.
 Group Vice President

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
 BORON DILUTION MITIGATION SYSTEM
 ADDITIONAL INFORMATION RELATED TO LAR 92-001

REF: TU Electric letter from William J. Cahill, Jr.
 to the NRC dated February 28, 1992

Gentlemen:

The referenced letter requested an amendment to the CPSES Unit 1 Operating License (NPF-87) to revise the Technical Specifications as they relate to the Boron Dilution Mitigation System. On March 23, 1992, a meeting was held in Rockville, Maryland, to discuss this proposed amendment. The meeting was attended by representatives from the NRC Staff, TU Electric and the Westinghouse Electric Corporation.

As a result of that meeting, TU Electric was requested to provide additional information. The NRC did not feel that it was appropriate to approve this amendment as a permanent change due to the potential generic implication to certain other Westinghouse units; however, the NRC did recognize that temporary relief was necessary for CPSES until the issue could be researched further and an acceptable long-term solution could be identified. Therefore, TU Electric was requested to provide a letter which proposed a time limitation for the revised Technical Specification (including proposed mark-up of the current Technical Specification (NUREG-1399) pages) and a discussion of the compensatory actions that TU Electric would take during this time period. This letter hereby provides the requested information.

TU Electric proposes that the Technical Specification revision proposed by the referenced letter remain in effect for Unit 1 until six months after criticality following the second refueling outage and for Unit 2 until six months following initial criticality. These durations are expected to allow sufficient time to research the issues involved, verify the conclusion during testing following core (re)load, propose a permanent resolution and for the NRC to review and approve the permanent resolution. A modification to the Technical Specifications (NUREG-1399) mark-up submitted in the reference letter is included in Attachment 2 to address these time limits.

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This mark-up splits the applicable action statement to address the Source Range and the Boron Dilution Flux Doubling separately and a footnote is used to denote the effective date for the Boron Dilution Flux Doubling requirement.

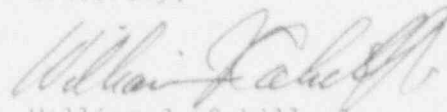
The following compensatory action is proposed for the duration of this temporary revision of the Technical Specification:

- 1) Within 4 hours of entry into MODES 3, 4, or 5 from MODES 1, 2, or 6, (and once per every 14 days thereafter while in MODES 3, 4, or 5), TU Electric will verify (unless startup is in progress) that either valve CS-8455 or valves CS-8560, FCV-111B, CS-8439, CS-8441, and CS-8453 are closed and secured in position; or
- 2) Within 4 hours of entering MODE 5, TU Electric will ensure that only one Reactor Makeup Water Pump (dilution source) is aligned to the supply header. Following entry into MODES 3, 4, or 5 from MODES 1, 2 or 6, each crew of the Control Room Staff will receive a briefing to discuss the type of reactivity changes that could occur during a dilution event; the indications of a dilution event; and the actions required to stop a dilution, commence immediate boration and establish the required shutdown margin. For extended shutdowns, this briefing will be repeated for each crew prior to resumption of control room duties following an off duty period which exceeds 7 days. During time periods when this option is used, the source range will be monitored for indication of unexplained increasing counts and inadvertent boron dilution every fifteen (15) minutes.

Since this letter merely limits the duration of the Technical Specifications proposed in the referenced letter, the safety assessment and no significant hazard determination provided in the referenced letter remain valid.

If there are any questions on this letter, please contact Jimmy Seawright at (214) 812-4375.

Sincerely,



William J. Cahill, Jr.

DRW/grp

Attachment: Marked-up Technical Specification Pages
(NUREG-1357)

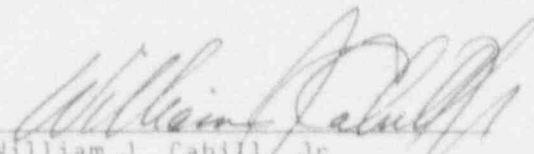
c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

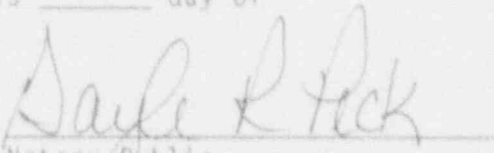
AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to the Boron Dilution Mitigation System Additional Information Related to License Amendment Request 92-001 for the captioned facility; 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.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF)

Subscribed and sworn to before me, on this 6th day of
April, 1992.


Notary Public