Log # TXX-4199
File # 10010

TEXAS UTILITIES GENERATING COMPANY

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

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

June 8, 1984

Mr. Harold R. Denton
Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
DEFERRED PREOPERATIONAL TESTING ITEM NO. 6

REFERENCE: Letter to Mr. Harold R. Denton from Mr. B. R. Clements dated May 14, 1984

Dear Mr. Denton:

Per our commitment in the above referenced letter, we are submitting a description and summary evaluation of the sixth test proposed for deferment to you for NRC staff review and concurrence.

The sixth test for deferment concerns the preoperational testing (thermal expansion) of piping systems and supports. A description and summary safety evaluation is included in the attachment to this letter. As noted in the attachment, our evaluation indicates that deferral of this item does not constitute an unreviewed safety question and does not require any Technical Specification exceptions. We request your concurrence with our proposal to defer this test until after fuel load. The majority of this testing will be completed prior to initial criticality with exception of the final cold settings and gap clearance measurements which are scheduled for performance during cold shutdown at the end of the 30% power testing plateau.

If you have any questions concerning this request, please contact me to arrange a meeting with the appropriate members of my staff.

Sincerely,

Billy R Clements

BRC:bjm
Attachment
cc: T. A. Ippolito
S. B. Burwell
J. Stefano

A001
1/1

DEFERRED PREOPERATIONAL THERMAL EXPANSION TESTING

During the conduct of Preoperational Test ICP-PT-55-11, "Thermal Expansion", a number of test deficiencies were identified involving piping systems and their supports. Identified test deficiencies fall into the following three categories:

a. Items removed during testing due to interferences

   1) Snubbers - 88
   2) Springs - 0
   3) Pipe whip restraints - 0
   4) RCP tie rods - 4

b. Items installed which did not meet acceptance criteria

   1) Snubbers - 365
   2) Springs - 206
   3) Pipe whip restraints - 57
   4) Pipe points - 112

c. Items not installed for test

   1) Snubbers - 166
   2) Springs - 1
   3) Pipe whip restraints - 13

Piping systems affected by these deficiencies include:

a. Main Feedwater System
b. Main Steam System
c. Reactor Coolant System
d. Component Cooling Water System
e. Chemical and Volume Control System
f. Primary Sampling System
g. Residual Heat Removal System
h. Steam Generator Blowdown and Cleanup System
i. Safety Injection System
j. Waste Processing Systems

Corrective actions to be implemented prior to fuel load include:

a. Redesign and reinstallation of those items removed due to interference.
b. Installation of those items not installed.
c. Evaluation and proper corrective action applied to those items not meeting acceptance criteria.

The testing required to close out this preoperational test include:

a) Verification of the proper cold setting and gap clearances for the items requiring retest during cold conditions.
b) Verification that selected retest items allow systems to expand without interference throughout the range of thermal expansion.
c) Verification of the proper hot setting and gap clearances for the items requiring retest during hot conditions.
d) Verification of final cold setting and gap clearances of items requiring retest.

It is our plan to conduct the above testing after fuel load but prior to initial criticality, when the next plant heatup is expected to occur. This testing would be concluded during Modes 6 through 3. It would verify proper cold and hot settings and gap clearances of the retest items and also verify that selected retest items allow systems to expand without interference throughout the range of thermal expansion. Final cold setting and gap clearance of retest items would be performed at the first convenient cold shutdown period prior to completion of the Initial Startup Program. This verification is currently scheduled for performance at the end of the 30% power testing plateau. Cold setting and gap clearance for snubbers located on systems required to be operable during Modes 5 and 6 will be performed prior to fuel load as required by the present draft of CPSES Technical Specifications after systems are filled and vented. The above testing will be incorporated into the appropriate Initial Startup (ISU) Test procedure. All ISU test procedures are reviewed and approved by the Station Operations Review Committee.

Summary and Safety Evaluation

A review of this deferred item was conducted per 10CFR50.59. This review was performed to determine if deferral of this preoperational testing would constitute an unreviewed safety question or require a change to the draft CPSES Technical Specifications. Qualitative evaluation of the appropriate chapters of the FSAR provided the bases to the conclusion that no technical specification exceptions are required and no unreviewed safety question exist.

The process of correcting the identified deficiencies and code stamping of supports and systems provides adequate assurance that the affected systems may be classified as operable to support fuel loading. In addition, the performance of cold setting and gap clearance measurements after system float on those snubbers located in systems required to be operable during Modes 5 and 6 prior to fuel load should ensure that Technical Specification 3.7.9 snubber operability requirements for snubbers located on systems required to be operable in Modes 5 and 6 are met.

What remains is a verification of the designed thermal expansion of these systems and components. This verification will be performed during the first controlled heat up from Mode 5 to Mode 3 following fuel loading.

Problems, if any, of snubber operability encountered during this heat up and design verification process will be handled in accordance with the applicable technical specifications both for the snubber program and the affected system. The applicable technical specifications are 3.4.1.2 (RCS), 3.4.1.3 (RHR), 3.5.2 (ECCS), 3.5.3 (ECCS), 3.7.1.2 (AFW), 3.7.3 (CCW), 3.7.9 (SNUBBER), and 3.9.8.2 (RHR/Refueling).

Therefore, since no adverse effects are associated with deferral of this item, this activity is submitted and recommended for deferral until after fuel load of Unit 1.