



Log # TXX-92055
 File # 10035 GL 91 11
 908.3 (c1e)
 Ref. # 10CFR50.54(f)
 10CFR50.109(a)(6)

William J. Cahill, Jr.
 Group Vice President

February 3, 1992

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) *ty*
 DOCKET NOS. 50-445 AND 50-446
 RESPONSE TO GENERIC LETTER 91-11;
 RESOLUTION OF GENERIC ISSUES 48, "LCOs FOR
 CLASS 1E VITAL INSTRUMENT BUSES," AND 49,
 "INTERLOCKS AND COs FOR CLASS 1E TIE BREAKERS"

Gentlemen:

Generic Letter (GL) 91-11 requested that licensees ensure that plant procedures include time limitations and surveillance requirements for the following. Otherwise, licensees are to provide adequate justification for why such procedures are not needed.

1. Vital instrument buses (typically 120 Vac buses),
2. Inverters or other onsite power sources to the vital instrument buses, and
3. Tie breakers that can connect redundant Class 1E buses (ac or dc) at one unit or that can connect Class 1E buses between units at the same site.

GL 91-11 also states that recently licensed Westinghouse, Combustion Engineering and General Electric (BWR/6) plants have resolved these concerns by implementing the Standard Technical Specifications.

CPSES Unit 1 has a full power operating license and accompanying Technical Specifications. The CPSES Technical Specifications are based on the Westinghouse Standard Technical Specifications. As specified in GL 91-11, implementation of the Westinghouse Standard Technical Specification resolves Generic issues 48 and 49 and therefore satisfies the requirements of this generic letter. In addition, TU Electric has procedures in place to ensure that the surveillance requirements of the Technical Specifications are met.

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CPSES Unit 2 is still in the construction phase. When licensed, TU Electric is proposing a dual Unit Technical Specifications based on the Unit 1 Technical Specifications. Therefore, the above response also applies to Unit 2.

Sincerely,



William J. Cahill, Jr.

VPC/gj
Attachment

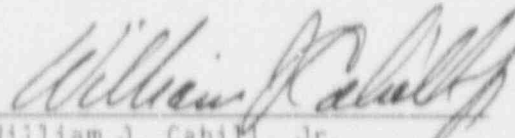
c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. M. B. Fields, NRR

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))

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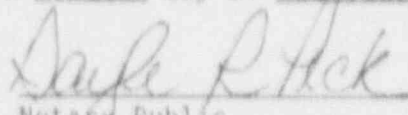
William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Generic Letter 91-11 for the captioned facility; that 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 DALLAS)

Subscribed and sworn to before me, on this 3rd day of February, 1992.



Notary Public