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**TU ELECTRIC**

February 3, 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  
PRELIMINARY ISSUES AFFECTING THE DEVELOPMENT OF THE CPSES  
UNIT 2 INSERVICE TEST PLAN FOR PUMPS AND VALVES

Gentlemen:

The purpose of this letter is to further discuss several issues which affect the development of the CPSES Unit 2 Inservice Test (IST) Plan for Pumps and Valves and, to some extent, impact the existing Unit 1 IST Plan. These issues were first discussed with your Mr. Mel Fields at CPSES on December 12, 1991.

1. The Unit 2 IST Plan is being developed in accordance with the requirements of the 1989 Edition of ASME Section XI. Although this edition of the Code is not endorsed by 10CFR50.55a at this time, the NRC staff's intent to eventually approve the use of the 1989 Edition is clear from the Federal Register article on this subject (56 Fed. Reg. 3796 - January 31, 1991). We understand that final approval of the rule change to endorse the 1989 Code is expected by late February 1992. This time frame is consistent with the anticipated licensing schedule for CPSES Unit 2. However, were the rule change not to take place, we would nonetheless pursue using the 1989 Edition of Section XI via the relief process.
2. Coincident with the preparation of the Unit 2 IST Plan, we wish to upgrade the existing Unit 1 IST Plan to the 1989 Edition of Section XI and, further, we wish to address the testing of both units in the same IST Plan document. (The Unit 1 IST Plan is currently developed in accordance with the 1986 Edition of Section XI.) If the later code is approved by the NRC, TU Electric will request approval to use this later code for Unit 1 per 10CFR50.55a(g)(4)(iv). If the later code is not approved for use by the regulations, TU Electric will submit a relief request for approval to use the later code. There are several reasons for pursuing a combined unit IST Plan. First of all, there are considerable changes from the 1986 to the 1989 edition of Section XI. So by testing both units to the 1989 Code, a significant unit difference is eliminated. Second, we agree with the NRC staff that the 1989 Code is technically superior in most cases to the 1986 Code regarding pump and valve testing requirements.

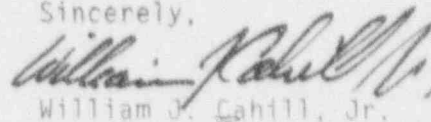
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Third, by consolidating the test requirements for both units (which have few, if any, pump and valve program scope differences) into a common IST Plan, the administrative effort of preparing mandatory 120 month program updates would be greatly reduced as would the NRC staff review effort. To be clear on this third point, we not only wish for the two CPSES units to be subject to the same inservice testing code requirements, but also that they be subjected to the same schedule for the periodic program updates required by 10CFR50.55a. At a later date, TU Electric intends to submit a plan, and if appropriate, an exemption request to establish the same update schedules for both units.

3. We anticipated submittal of the combined CPSES Unit 1 and 2 IST Plan for NRC staff review of relief requests to be on or about July 1, 1992.
4. Implementation of the combined unit IST program on CPSES Unit 2 will be as per the licenising schedule of that unit. Implementation of the upgraded programs on CPSES Unit 1, will be based upon NRC's approval of any new relief request and a reasonable time period to upgrade plant procedures and perform the required surveillances. The exact implementation dates and schedules for CPSES Unit 1 will be established later.
5. Attachment 1 to this letter contains a relief request regarding preservice testing of the Main Steam and Pressurizer Safety Valves for CPSES Unit 2. The relief request wording is developed based on the test requirements of the 1989 edition of Section XI (i.e., OM Part 1, 1987) which, as pointed out in item 1 above, is the test code to which we intend to commit. It should be pointed out that the preservice testing requirements for the subject valves under the 1989 Code are no different than the requirements specified for these valves in the 1986 Code, which 10CFR50.55a currently endorses. This relief request will be included as part of the IST Plan submittal mentioned in item 3 above; however, it is being submitted now to allow ample planning time in the startup program for the testing of these valves. We request your concurrence on this relief by April 1, 1992. In preparing this relief request we have informally consulted with the ASME OM Working Group on Safety and Relief Valves regarding the intent of the Code requirements. We have been advised by the chairman of that working group that a change to the subject test requirements of OM Part 1 has been prepared (though not yet approved), and that the wording of the proposed change is essentially the same as the alternate testing proposed in the attached relief request. This change to OM Part 1 is anticipated to appear in the 1993 Addenda to ASME OM Code.

Sincerely,



William J. Cahill, Jr.

CEJ/vld  
Attachment

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

RELIEF REQUEST NUMBER: V-1

SYSTEM: Main Steam, Reactor Coolant

VALVE NUMBER(S): ZMS-0021, 0022, 0023, 0024, 0025, 0058, 0059, 0060,  
0061, 0062, 0093, 0094, 0095, 0096, 0097, 0129, 0130,  
0131, 0132, 0133 (Main Steam)

2-8010A, 8010B, 8010C (Reactor Coolant)

CATEGORY: C

CLASS: 2 (Main Steam), 1 (Reactor Coolant)

FUNCTION: Main Steam Safety Valves, Pressurizer Safety Valves

TEST REQUIREMENT: -OM Part 1, para. 7.2, "Testing After Installation  
Prior to Initial Electric Power Generation" (General  
Requirement)

-OM Part 1, para. 7.2.1.1 (Class 1 Safety Valves);  
"Within 6 months prior to initial fuel loading each  
valve shall have its set pressure verified. Set  
pressure verification shall be determined by  
pressurizing the system up to the valve set pressure  
and opening the valve, or the valve may be tested at  
or below normal system operating pressures with an  
assist device."

-OM Part 1, para. 7.2.1.1a (Main Steam Safety Valves);  
"After system heatup, but prior to initial reactor  
criticality, each valve shall be subjected to the  
following tests.

- 1) Set pressure verification shall be determined by  
pressurizing the system up to the valve set  
pressure and opening the valve, or the valve may  
be tested at or below normal system operating  
pressure with an assist device.
- 2) Compliance with the Owner's seat tightness  
criteria shall be verified."

BASIS FOR RELIEF:

The primary intent of the subject Code paragraphs is to require testing of Class 1 and Main Steam Safety Valves shortly before a Pressurized Water Reactor plant is initially started up. This requirement is reasonable when one considers the safety significance of these valves and the fact that years may elapse between the manufacturer's shop test and the time the valves are placed in service. However, the code also seems to imply that the required testing should be done with the valves in-place. Removal of the valves from the system for testing (at a testing lab, for example) can yield test results as good as or better than in-place testing.

ALTERNATE TESTING:

For the purpose of accomplishing Main Steam and Pressurizer Safety Valve testing prior to initial electric power generation, the following requirements will apply:

- 1) Within 6 months of initial fuel loading, each Pressurizer Safety Valve shall have its set pressure verified.
- 2) Either before or after installation and within 6 months prior to initial reactor criticality, each Main Steam Safety Valve shall be subjected to the following tests:
  - a) set pressure verification
  - b) compliance with the Owner's seat tightness criteria shall be verified