Log # TXX-4202
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 15, 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. 7

REF: 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 seventh test proposed for deferment to you for NRC staff review and concurrence. This is the last test deferral request we expect to make.

The seventh test proposed for deferment concerns the completion of the preoperational air flow balancing of the control room. 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 the completion of this test until after fuel load. This testing will be completed prior to initial criticality.

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

Respectfully,

Billy R. Clements

BRC/grr
Attachments
cc - T. Ippolito
S. Burwell
J. Stefano

B001
1/1

Deferred Preoperational Control Room Air Balance

During the initial control room air balance, it was determined that with the Train A system properly balanced, the Train B system would provide greater air flow to the Unit 1 area of the control room and hence a less than design air flow would be supplied to the Unit 2 area.

It was decided to modify the four control room supply trunk ducts with the installation of two-position dampers in each duct interlocked for Train A or B operation so as to provide proper flow distribution to each unit's control room area. This modification was originally intended to be performed some time prior to Unit 2 operation.

Since that initial implementation proposal was made, it has been re-evaluated and the modification is now in progress. The four dampers are physically installed, but not electrically operational. Due to that electrical work remaining on the dampers and the other testing for the control room ventilation, the schedule will not allow for the completion of the control room air balancing prior to fuel loading of Unit 1.

It is presently planned, that as conditions exist, the electrical portion of the damper installation will be completed and the air balancing will begin. The completion of the air balance is scheduled to occur prior to initial criticality of the Unit.

Summary and Safety Evaluation

A review of this deferred item was conducted per 10CFR50.59. This review was performed to determine if deferral of the completion of this air balance 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 questions exist.

The successful completion, prior to fuel loading, of the prescribed preoperational testing of the Control Room Heating, Ventilation, and Air Conditioning (HVAC) Systems provides the assurance that this system is operable and capable of performing its intended function. As the system is now set up, the Unit 1 "Control Room Emergency Air Cleanup System, and 3.7.13 "Area Temperature Monitoring", with either train of HVAC in service.

The completion of the final air balancing of the Control Room HVAC has no impact on the operation of either the HVAC equipment or the equipment in the Unit 1 area of the Control Room as all Unit 1 Control Room design air flows are met or exceeded with either train in service. The deficient air flows are in the Unit 2 control room area.

Therefore, since no adverse effects are associated with the deferral of this item, the completion of this activity is submitted and recommended for deferral until after fuel load, but prior to initial criticality of Unit 1.