

Docket Nos.: 50-445
and 50-446

OCT 25 1984

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive Street
L. B. 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Staff Findings Pertaining to Containment Isolation Items for
the Comanche Peak Steam Electric Station (Units 1 and 2)

The subject staff findings were forwarded to you by my letter dated October 11, 1984. It was subsequently determined that the enclosure to that letter was incomplete, and that Pages 5 and 6 were not transmitted.

Enclosed is the complete report which includes the missing pages, and supersedes what was furnished with my letter of October 11, 1984.

Sincerely,

ORIGINAL SIGNED BY:

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure: As stated

cc: See next page

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COMANCHE PEAK

OCT 25 1984

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SAFETY EVALUATION REPORT SUPPLEMENT
CONTAINMENT SYSTEMS BRANCH
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-445/446

6.2 Containment Systems

6.2.3 Containment Isolation System

I. Containment Isolation Provisions for Containment Emergency Sump
Recirculation Lines

The containment emergency sump recirculation lines are provided with a single, remote, manual gate valve outside the containment. The valve is enclosed in a valve isolation tank. The piping from the sump to the valve is enclosed in a concentric guard pipe. In Section 6.2.3 of the SER for Comanche Peak, dated July 1981, it is stated that the valve isolation tank and the concentric guard pipe are leaktight at containment design conditions. In FSAR Amendment 38, the applicant stated that "The guard pipe and valve isolation tank are not considered part of the barrier between containment and external environment and are not tested at containment design conditions. The reason for this is that these moderate energy lines are designed to meet the requirements of Branch Technical Position MEB 3-1 (SRP 3.6.2)". In light of this information, we find it acceptable to forego leak testing of the guard pipe and valve isolation tank at containment design condition.

II. Elimination of Type C Leakage Tests for Certain Containment Isolation Valves

By letters dated August 19 and December 16, 1983, and April 6, 1984, the applicant requested that a number of containment isolation valves be eliminated from the Type C leak testing program. The isolation valves involved and the associated justification are provided in Table 6.2.4.2 of FSAR Amendments 42, 46, and 51. We have reviewed this information and find it acceptable. The following is a discussion of these valves:

1. Safety Injection Valves 1-8802 A, 1-8802 B, and 1-8840 are normally closed and are required to open during post-accident conditions. The Safety Injection System is a closed system outside containment which operates at a pressure in excess of containment design pressure. In the event the valve fails to open, leakage of containment atmosphere is prevented by the pump pressure on the system side and a water seal on the containment side of the valve. The combination of the valve disc seal and the double stem seals preclude the possibility of significant stem leakage. In lieu of Type C testing, the applicant has committed to conduct quarterly stem leakage measurements. We find this is acceptable. The surveillance requirements and acceptance criteria should be included in the plant's Technical Specifications.

2. Containment Isolation Valves HV-4776, HV-4777, ICT-142, and ICT-145 on the spray systems are normally closed and are required to operate during post-accident conditions. The applicant indicated in Amendment 42 of the FSAR that there is a water filled loop seal on the containment side of the valves which would exist for a period greater than 30 days following onset of an accident. In lieu of Type C testing, the applicant has committed to conduct leakage testing with water. We find this to be in accordance with the provisions of Section III.C.3(b) of Appendix J to 10 CFR Part 50. The surveillance requirements and acceptance criteria should be included in the plant's Technical Specifications.

6.2.5 Containment Leakage Testing Program

Exemption from Section III.D.2(b)(ii) of Appendix J to 10CFR50

By letter dated August 23, 1984, the applicant requested an exemption from certain requirements of 10CFR50, Appendix J, Paragraph III.D.2(b)(ii), which states:

"Air locks opened during periods when containment integrity is not required by the plant's Technical Specifications shall be tested at the end of such period at not less than Pa."

Whenever the plant is in Mode 5 (cold shutdown), containment integrity is not required. Hence, if an air lock is opened during Mode 5 operations, paragraph III.D.2(b)(ii) requires that an overall air lock leakage test at not less than Pa be conducted prior to entry into Mode 4.

Even if the periodic 6-month test required by Paragraph III.D.2(b)(i) of Appendix J has been satisfied, to meet the requirement of Paragraph III.D.2(b)(ii), no access to the containment can be allowed while preparing to leave Mode 5 until an air lock that has been opened in Mode 5 is first tested. The test would effectively be required every time Mode 5 was entered. The containment would have to be cleared of personnel during performance of this test or they would be required to remain inside containment during the test and until the plant reached Mode 4. Often there are several minor operational and maintenance problems that require containment entry just prior to entering Mode 4; the special air lock test would have to wait until all problems requiring containment entry were first corrected. This is a very restrictive requirement and would slow the process of returning to operation.

If the periodic 6-month test of Paragraph III.D.2(b)(i) and the test required by Paragraph III.D.2(b)(iii) are current, no maintenance has been performed on the air lock, and the air lock is properly sealed, there should be no reason to expect the air lock to leak excessively just because it has been opened in Mode 5 or Mode 6.

Accordingly, the staff concludes that the applicant's proposed approach of substituting the seal leakage test of Paragraph III.D.2(b)(iii) is acceptable when no maintenance has been performed on an air lock. Whenever maintenance has been performed on an air lock, the requirements of Paragraph II.D.2(b)(ii) of Appendix J must still be met by the applicant.

Therefore, an exemption from this requirement [10CFR50, Appendix J, Paragraph III.D.2(b)(ii)] is justified and acceptable for Comanche Peak, Units 1 and 2, and appropriate requirements will be added to the plant Technical Specifications.

II.E.4.2 Containment Isolation Dependability

By letter dated August 20, 1984, the applicant noted an inconsistency between the plant's Technical Specifications (TS) and the SER. On page 22-54 of the SER it is stated that:

"The containment 48-inch purge supply and exhaust valves will be sealed closed by administrative control, which will require checking the valve position lights in the control room once every 31 days. This requirement will be included in the Technical Specifications."

The applicant indicated that a requirement to check these isolation valve position lights is not in the Standard Technical Specifications, and therefore, should not be in the Comanche Peak TS. We concur with the applicant's contention since in NUREG-0737, Item II.E.4.2, Clarification (7), checking valve position lights in the control room is only a suggested method of verifying that the purge valves are closed.

The Standard Technical Specifications and the Comanche Peak TS, state, as a surveillance requirement that:

"Each 48-inch containment purge supply and exhaust isolation valves shall be verified to be locked closed at least once per 31 days."

We find this to be acceptable. Consequently, the sentence in the SER shall be revised as follows:

"The containment 48-inch purge supply and exhaust valves will be sealed closed by administrative control, and their sealed-closed condition will be verified at least every 31 days. This requirement will be included in the Technical Specifications."