



Log # TXX-95277  
 File # 10010  
 Ref. # 10CFR50.54(a)(3)

**TU**ELECTRIC

November 15, 1995

**C. Lance Terry**  
 Group Vice President, Nuclear

U. S. Nuclear Regulatory Commission (NRC)  
 Attn: Document Control Desk  
 Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
 DUCKET NOS. 50-445 AND 50-446  
 STATION OPERATIONS REVIEW COMMITTEE REVIEW OF DESIGN  
 MODIFICATIONS

Gentlemen:

In accordance with the requirements of 10CFR50.54(a)(3), TU Electric requests approval of the attached revision to the FSAR regarding the function of the Station Operations Review Committee (SORC). Specifically, the change deals with the review and approval of design modifications, which is part of the previously accepted CPSES quality assurance program. Since this revision may be considered to be a reduction in quality assurance commitment, NRC approval is requested prior to implementation of the changes.

TU Electric believes that the requirements of SORC with respect to the design modification process is summarized best in Section 6 of the Technical Specifications. One of the requirements of SORC is to review safety evaluations for changes to systems or facilities to verify such actions do not constitute an unreviewed safety question. Historically, TU Electric has taken a conservative approach and committed to including SORC in the process of design modification approval prior to implementation. Due to the large volume of design modifications prior to licensing of the facility, TU Electric management elected to have a management board (SORC) reviewing all design modifications to assure program consistency and to review the design modification implementation plans. Since this process was first implemented, our work force has stabilized and consistency has been achieved for assessing safety impact to the plant. TU Electric is now seeking ways to re-engineer processes without impacting safety. As a result of a re-engineering effort, the design modification process is being modified to increase teamwork and efficiency. It was determined that under Regulatory Guide 1.33 Revision 2, which TU Electric is committed to, there is no requirement for SORC review of design modifications. In Technical Specifications Section 6.5.1.6b, SORC is responsible for reviewing "safety evaluations for:

9511200177 951115  
 PDR ADOCK 05000445  
 P PDR

Energy Plaza 1001 Bryan Street Dallas, Texas 75201-3411

DO29

1) procedures, 2) change to procedures, equipment, systems or facilities and 3) tests or experiments completed under the provision of 10CFR50.59 to verify that such actions did not constitute an unreviewed safety question." In the Technical Specifications Section 6.5.1.6c, SORC is responsible for reviewing proposed procedures and changes to procedures, equipment, systems or facilities which involve an unreviewed safety question as defined in 10CFR50.59 or involves a change in Technical Specifications." In NUREG-0797 Supplement 22 Section 13.4.1 it states "The applicant has revised the responsibilities of the SORC. The applicant deleted the review of proposed procedures and of changes to procedures, except for administrative procedures, the review of proposed tests and experiments that affect nuclear safety, and the review of proposed changes or modifications to plant safety-related systems and components. The SORC will review only the safety evaluations of those items. The Unit 1 Final Draft Technical Specifications describe new provisions (Technical Review and Control) for the review of procedures, proposed tests and experiments, and proposed changes or modifications to plant safety-related systems and components. The staff finds these changes acceptable as they meet the appropriate acceptance criteria of SRP Section 13.4." Under the new design modification process, these requirements are not changed because the SORC will continue to provide the reviews and approvals described previously. All design modifications will be reviewed against 10CFR50.59 to determine if a "safety evaluation" per 10CFR50.59(b)(1) must be performed. If a "safety evaluation" is required, the SORC will review and approve the evaluation. The Plant Manager or his designee will approve all modifications prior to implementation. The new design modification process brings the design modification program in line with the licensing basis as previously described within NUREG 797 supplement 22, the FSAR, and the Technical Specifications for CPSES.

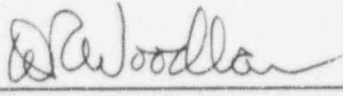
In summary, the traditional role of SORC to provide on-going safety evaluation review for design modifications involving safety related equipment, facilities, systems, an unreviewed safety question, or a change in Technical Specifications will continue. Additional SORC review of design modifications with no unreviewed safety questions, no impact on safety related equipment, facilities, or systems, or no change in Technical Specifications is an unnecessary expenditure of CPSES management and staff resources. Furthermore, the expenditure of these resources does not create any additional safety benefit. Consistent with recent NRC and industry initiatives to reduce regulatory burden, TU Electric proposes to modify its commitment to have SORC approval of design modifications as described in the attachment to this letter. Attachment 1 provides a mark-up of the affected FSAR pages.

TXX-95277  
Page 3 of 3

If there are any questions, please contact Mr. Ray Adams at (214) 812-8826. In accordance with 10CFR50.54(a)(3)(iv), CPSES plans to implement these changes following receipt of an NRC letter indicating acceptance or 60 days after the date of the submittal.

Sincerely,

C. L. Terry

By:   
D. R. Woodlan  
Docket Licensing Manager

RJA/grp  
Attachment

c - Mr. L. J. Callan, Region IV  
Mr. W. D. Johnson, Region IV  
Mr. T. J. Polich, NRR  
Resident Inspectors, CPSES

includes provisions that personnel performing activities affecting quality are:

- 1. Instructed as to the purpose, scope, and implementation of the Quality Assurance Program and related procedures and instructions as appropriate to their activities.
- 2. Qualified in the principles and techniques of activities for which they are responsible.
- 3. Retrained, re-examined or recertified, when appropriate, to maintain necessary proficiency in those activities for which they are responsible.

71

17.2.3 DESIGN CONTROL

76

Q421.55

Q421.57

Requirements for the control of design activities associated with modifications (involving a new design or change in existing design) of safety-related structures, systems, and components are consistent with the provisions of Regulatory Guide 1.33, and Regulatory Guide 1.64 as discussed in Appendix 1A(B).

88

Q421.24

Q421.55

The Vice President of Nuclear Operations shall have the responsibility for approving and controlling the implementation of station design modifications. The Vice President of Nuclear Engineering and Support shall have the overall responsibility for developing procedures to maintain and control the design control process.

88

Q421.57

~~Final approval of all station modifications is the responsibility of the~~

71

~~SORC.~~ The SORC will submit all proposed station design modifications which involve a change in CPSES Technical Specifications or an unreviewed safety question to the ORC for review and approval before proceeding with implementation. Safety evaluations on station design modifications which do not involve unreviewed safety questions or a change in CPSES Technical Specifications will be reviewed by ORC, however, this will not be a prerequisite for implementation. ~~Upon~~

44

LCR

77

~~recommendation from SORC,~~ <sup>The</sup> Vice President of Nuclear Operations approves each station design modification for implementation.

88

LCR