

**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

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August 10, 1984

Director of Nuclear Reactor Regulation  
Attention: MR. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
INFORMAL QUESTIONS ON ENVIRONMENTAL QUALIFICATION

Dear Sir:

This letter responds to informal questions asked by your staff and their consultants during a phone conversation on August 9, 1984. These questions related to environmental qualification and, more specifically, to the data provided in the CPSES FSAR for four qualification packages; MS-78, MS-76 (1 of 3), ESE-27, and ESE-40. The responses to the questions on these packages are provided below.

MS-78

The CPSES FSAR Appendix 3A Table 5-1 (sheet 2), Amendment 47, is in error. This sheet incorrectly identifies the model number for the Main Steam Relief Valve Limit Switch (MS-78) as EA 170 and incorrectly refers to ES29, 2 of 4, for demonstrated qualification values. The correct model number is EA180 and the correct reference is ES29, 1 of 4. The CPSES FSAR will be corrected to show the proper model number and reference.

MS-76, 1 of 3

Sheet 3 in Table 5-1, Appendix 3A, of the CPSES FSAR includes the Main Steam Isolation Valve Operators (MS-76, 1 of 3), a Greer Actuator model OPC-03928-CSVA. The demonstrated qualification values in this table do not envelope of postulated values for these operators. This apparent discrepancy has been resolved with an analysis which shows that the existing testing does demonstrate qualification for the relatively short term peak of a main steam line break in this compartment. The Greer Actuators, however, have been replaced by Rockwell operators (MS-76, 3 of 3); therefore, MS-76, 1 of 3, and the Greer Actuators are no longer of concern for CPSES and they will be deleted from the CPSES FSAR.

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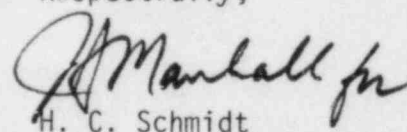
ESE-27

The qualification values for the Nitrogen-16 detectors and detector junction boxes are not yet included in the CPSES FSAR. The Texas Utilities review and certification of this qualification package had not been completed in time to add these values to the FSAR. These values will be provided in an upcoming amendment.

ESE-40

The equipment qualification for the switches in ESE-40 is not complete due to seismic problems. These seismic problems are being addressed and a Justification for Interim Operation (JIO) was provided in TXX-4208 of June 29, 1984. A JIO was not provided for environmental qualification for these switches are located in a mild environment except for radiation ( $1.61 \times 10^6$  RAD gamma total integrated dose) and an analysis has been performed that verifies that this dose will not degrade the operability of these switches below acceptable values. Aging, although not required by 10 CFR 50.49 and Regulatory Guide 1.89, Revision 1 in a mild environment, has been addressed by the Westinghouse Short Term Aging Program. Attached to this letter is the radiation analysis discussed above.

Respectfully,

  
H. C. Schmidt

DRW:tls  
Attachment

Original + 5 copies