ENCLOSURE

SUPPLEMENTAL SAFETY EVALUATION REPORT
DEFERRAL OF CERTAIN PREOPERATIONAL TESTS
COMANCHE PEAK UNIT 1

Texas Utilities Generating Company in letters from B. R. Clements to H. R. Denton, NRC, dated May 29, June 5, June 8 and June 15, 1984, requested approval to defer six preoperational tests until after fuel loading. The testing would be completed prior to initial criticality with the exception of a portion of the thermal expansion test. This test requires heatup and return to cold shutdown conditions for completion and is scheduled at the completion of the 30 percent power plateau.

A. 1CP-PT-45-06, Containment Cooling Systems

The applicant has requested that this test be repeated after fuel loading. Testing of the containment cooling systems were performed during the normal preoperational test program; however, test deficiencies were identified requiring system modifications which could not be retested prior to the scheduled fuel loading.

The repeat of this test after fuel loading is acceptable because only limited portions of the system require retesting, no technical specification exceptions are required and, for operation to continue, the system must still meet technical specifications temperature limits in critical areas.

B. 1CP-PT-57-09, Check Valve and Hot Functional Safety Injection

The applicant has requested that this test be repeated after fuel loading. During the initial test, a number of check valves leaked in excess of their acceptance criteria. These valves have been repaired or replaced. The repeat testing of these valves would be performed as required by the technical specifications surveillance tests for check valves. It is acceptable to defer repeating portions of this test until after fuel loading, but before criticality, because (1) it is consistent with the technical specifications which control normal operation and define check valve operability and (2) presents no safety problem because retesting is completed prior to criticality.

C. 1CP-PT-37-03, Turbine Driven Auxiliary Feedwater Pump Steam Supply Line Check Valve and Drain Pot Level Control Valve

In performing this preoperational test, a faulty level switch and corroded and bent disks in the steam supply line check valve were discovered. The applicant has made the necessary repairs and requests approval to complete the test after fuel loading (which will be the next scheduled heatup). This request is acceptable because there will have been no power operation prior to the retest and repeat of the necessary portions of this test will be completed prior to criticality.

D. 1CP-PT-55-09, Reactor Coolant Pump (RCP) Test and 1CP-PT-49-02, Seal Water and Letdown Flow Performance

Several test deficiencies relating to the RCP seals were identified during the performance of these preoperational tests. Modifications to correct the deficiencies have been completed. The applicant proposed to incorporate the portions of the tests to be repeated into the appropriate startup test procedures to be performed after fuel loading, but prior to criticality. This schedule for retesting of the RCP seals is acceptable because it would be consistent with normal operating maintenance and test procedures and prior to initial criticality these systems are not required for plant safety.

E. 1CP-PT-55-11, Thermal Expansion Preoperational Test

During the performance of the thermal expansion test, a number of test deficiencies were noted pertaining to snubbers, springs and supports. These deficiencies were of three categories:

(1) installed items did not meet acceptance criteria;

(2) installed items removed due to interferences, and;

(3) items not installed for the test.

The applicant will have corrected these deficiencies and proposes that the test be repeated after fuel loading when the next plant heatup is completed for initial criticality. Final cold setting of retest items would be accomplished at the shutdown scheduled at the end of the 30% power plateau.

The deferral of the thermal expansion retest is acceptable because it is consistent with approved industry practice on other plant test programs. Furthermore, compliance with Technical Specifications relating to piping supports will be required for plant operation to proceed.

F. Control Room Ventilation System

During performance of the Control Room Ventilation System preoperational test, it was determined that the system provided more than adequate air supply to the control room area for Unit 1, but less than design air flow was supplied to Unit 2 control room area. The applicant is proceeding with modifications to the ventilation system to correct the design deficiency. The applicant plans to start retesting the modified system, but anticipates not being able to complete the testing prior to scheduled Unit 1 fuel loading. The applicant, therefore, requests deferral of completion of the test until after fuel loading.

Based on the condition that this deferral is a retest of a system which was already determined to be acceptable for the Unit 1 control area, we find the deferral of the retesting of the Control Room Ventilation System until completion of the initial fuel loading of Unit 1 (and before initial criticality) to be acceptable.

In summary, the deferral of these six preoperational tests represent retesting of modifications made to correct identified system deficiencies in the respective systems. Retesting these systems after initial fuel loading, but prior to initial criticality, will pose no safety problem, will be controlled by the plant Technical Specifications and are consistent with other plant test programs. On this basis, the requested deferrals are approved.