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TUELECTRIC

January 4, 1996

C. Lance Terry
 Group Vice President

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
 DOCKET NUMBER 50-446
 ENFORCEMENT DISCRETION FOR WIDE RANGE RCS TEMPERATURE-T_h
 REMOTE SHUTDOWN INDICATION FOR ONE RCS LOOP

- REF: 1. NUREG-1600, "General Statement of Policy and Procedures for NRC Enforcement Actions," dated June 1995
2. NRC Inspection Manual, Part 9900, "Operations - Enforcement Discretion," dated November 2, 1995

Gentlemen:

In accordance with the guidance provided by reference 1, Texas Utilities Electric Company (TU Electric) requests that the Nuclear Regulatory Commission (NRC) exercise enforcement discretion to allow CPSES Unit 2 to continue to operate with the normal Wide Range RCS (Reactor Coolant System) Temp. (Temperature)-T_h Remote Shutdown Indication for 1 of 4 loops inoperable. Without the requested enforcement discretion, compliance with CPSES Technical Specification 3.3.3.2.1 would require that TU Electric initiate unnecessary mode changes without a corresponding safety benefit, thus resulting in an unnecessary plant transient and unnecessary system realignments.

The referenced section of the NRC Inspection Manual (reference 2) provides guidance on the information to be included in a request for enforcement discretion. The sections below are arranged to correspond to that guidance.

1. REQUIREMENT/REQUEST:

Limiting Condition for Operation (LCO) 3.3.3.2.1, "Remote Shutdown Instrumentation," requires, in part, that one Wide Range RCS Temp.-T_h per RCS Loop be OPERABLE in MODES 1, 2, and 3. ACTION Statement "a" requires that an inoperable instrument be restored to OPERABLE status within 7 days or be in at least MODE 4, HOT SHUTDOWN, within the next 12 hours. TU Electric requests that the 7 day Allowed Outage Time (AOT) to restore OPERABILITY be extended.

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2. CIRCUMSTANCES:

On December 31, 1995, at 2:10 a.m. the Wide Range RCS Temp.- T_h for one RCS Loop was discovered to be inoperable. Troubleshooting efforts indicate a ground. Location of the ground has been isolated to an area inside containment that is normally only accessible during periods of a reactor shutdown. Radiation levels, temperature and personnel safety considerations preclude further trouble shooting and corrective actions without performing a plant shutdown and a possible cooldown.

CPSES Unit 2 is scheduled to commence a refueling outage on February 22, 1996. CPSES Unit 2 has no other outages planned during the 7 weeks prior to the scheduled start of the refueling outage.

3. SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES:

The subject instrument is part of the CPSES design for shutdown from outside the control room (see CPSES Final Safety Analysis Report (FSAR) section 7.4.1.3). The Hot Shutdown Panel (HSP) and the Shutdown Transfer Panel (STP) are provided as part of the CPSES unit design for shutdown outside the control room. Wide Range RCS Temperature indications are provided on the HSP for the RCS Loops. RCS temperature is used for the cooldown of the RCS and for the switch-over to Residual Heat Removal (RHR). In the unlikely event that shutdown from outside the control room (during the duration of the enforcement discretion) is required, the inoperability of Wide Range Temp.- T_h for a single RCS Loop is expected to have no measurable impact on the ability of the operators to safely cooldown the RCS and switch-over to RHR.

The T_h indication is used for monitoring subcooling margin and decreasing temperature during the cooldown. Steam Generator Pressure is the primary means of temperature control with T_c and T_h indication lagging due to response time. One T_h indication is adequate for the operator to perform a controlled shutdown of the reactor.

The worst case scenario for shutdown from outside the control room is for those instances involving a fire in either the control room or the cable spreading room. The failed T_h indication is one of two which have been analyzed to remain available for operation at the HSP following a fire per the Fire Safe Shutdown Analysis. Only two have been analyzed, as only those Steam Generators fed by the Train A Auxiliary Feedwater Pump are used for plant cooldown following a fire. If this event were to occur during the duration of this NOED, the operator would retain indication of RCS hot leg temperature from the remaining T_h indication. In accordance with Standard Review Plan 7.4 "Safe Shutdown Systems" and Branch Technical Position CMEB 9.5-1 "Guidelines for Fire Protection for Nuclear Power Plants," systems designed to ensure post fire shutdown capability, need not be designed to meet single failure criteria. For shutdowns other than post fire shutdown, the remaining T_h indicators (3) allow for plant cooldown.

Therefore loss of a single loop T_h indicator should have minimal safety

significance with no potential for negative consequences should use of the HSP be required.

4. UNREVIEWED SAFETY QUESTION / NO SIGNIFICANT HAZARDS CONSIDERATION:

TU Electric has considered the criteria for assessing the potential of creating an unreviewed safety question or a significant hazards consideration with the exercising of enforcement discretion. This request for additional AOT in combination with the compensatory actions described below, does not adversely affect the probability or consequences of any previously analyzed accident. Because no modifications are being made to the OPERABLE RCS temperature channels, and having inoperable instrument channels is already allowed by the action statements of the CPSES Technical Specifications, there is no potential for any new type of accident.

As a result, the requested enforcement discretion does not create an unreviewed safety question and does not constitute a significant hazards consideration.

5. ENVIRONMENTAL CONSEQUENCES:

The request only involves activities within the plant. These activities and their potential consequences are limited to the plant and will not result in any unplanned release that could impact the environment.

6. COMPENSATORY ACTIONS:

Briefings will be held to alert all shift licensed personnel as to the inoperability of this channel. As part of the briefing a discussion will be held on the impact on shutdown from outside the control room.

7. DURATION:

The requested duration is based upon the time required for the NRC to process a proposed change to the technical specifications. The requested duration is about 24 days, to commence upon expiration of the existing AOT (2:10 am January 7, 1996) and to expire at 11:59 pm February 1, 1996, or upon disposition of the proposed license amendment.

8. SORC REVIEW:

This activity has been reviewed and approved by the Station Operations Review Committee (SORC).

9. CRITERIA FOR EXERCISING ENFORCEMENT DISCRETION:

Reference 2, section B item 1 provides the criteria for exercising enforcement discretion for an operating plant as follows:

For an operating plant, the NOED is intended to (a) avoid undesirable transients as a result of forcing compliance with the license

condition and, thus minimize potential safety consequences and operational risk or (b) eliminate testing, inspection, or system realignment that is inappropriate for the particular plant conditions.

These criteria reflect the NRC's policy as provided in reference 1.

Initiating a shutdown to comply with the subject technical specification and then, shortly thereafter returning to power when OPERABILITY is restored, would subject CPSES to an undesirable transient.

10. PROPOSED TECHNICAL SPECIFICATION CHANGES:

A separate license amendment request, LAR 96-001, is being submitted under a different letter and a copy of the proposed marked up page(s) are attached. This LAR will request a temporary Technical Specification change which removes the requirement for the instrument until the upcoming Unit 2 refueling outage.

11. APPROVED LINE ITEM IMPROVEMENTS:

Prior adoption of approved line-item improvements to the Technical Specifications or the improved Standard Technical Specifications (STS) would not have obviated the need for this enforcement discretion request. The improved STS (NUREG-1431 Rev.1) does allow a 30 day AOT for the equivalent action condition (see specification 3.3.4 Condition A).

TU Electric is in the process of preparing a License Amendment Request to convert to the improved STS and submittal of the request is scheduled for December of 1996. Although the LAR associated with this request for enforcement discretion proposes a temporary change to the technical specifications, the LAR associated with the conversion of the technical specifications will re-evaluate the instrumentation requirements for remote shutdown and may propose permanent changes to the technical specifications.

Though a NOED would still be required under the improved STS, the 30 day AOT and the fact that the ACTION applies for the inoperability of one or more remote shutdown functions indicate a minimal safety impact due to the inoperability of a single temperature indicator on a single RCS Loop for approximately 53 days.

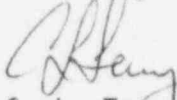
12. ADDITIONAL INFORMATION REQUESTED BY THE NRC STAFF:

The NRC staff has requested no additional information.

CONCLUSION.

TU Electric requests the NRC grant the requested enforcement discretion to allow Unit 2 to continue to operate while the NRC processes a proposed change to the technical specifications. If there is a significant change in the circumstances (e.g., if CPSES Unit 2 entered an unplanned cold shutdown for other reasons or additional indications on the HSP become inoperable) associated with this exercising of enforcement discretion, TU Electric will notify the NRC. A response is requested by 2:00 p.m. on January 6, 1996.

Sincerely,



C. L. Terry

DRW/gp

Attachment

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

TABLE 3.3-5
REMOTE SHUTDOWN MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>READOUT LOCATION</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Neutron Flux Monitors	HSP	2	1
2. Wide Range RCS Temp. -T _c	HSP	1/Loop	1/Loop
3. Wide Range RCS Temp. -T _h	HSP	1/Loop	1/Loop *
4. Pressurizer Pressure	HSP	1	1
5. Pressurizer Level	HSP	2	1
6. Steam Generator Pressure	HSP	1/SG	1/SG
7. Steam Generator Level	HSP	1/SG	1/SG
8. Auxiliary Feedwater Flow Rate to Steam Generator	HSP	2/SG	1/SG
9. Condensate Storage Tank Level	HSP	2	1
10. Charging Pump to CVCS Charging and RCP Seals - Flow Indication	HSP	1	1

HSP = Hot Shutdown Panel

SG = Steam Generator

* - The requirements for minimum channels operable for Wide Range RCS Temp. -T_h remote shutdown indication for Unit 2 are revised to 1/Loop for three (3) of the four (4) RCS Loops. This revision is to remain in effect until CPSES Unit 2 enters MODE 4 at the beginning of the second refueling outage for Unit 2.

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