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 Ref. # GL 90-06

TUELECTRIC

May 27, 1992

William J. Cahill, Jr.
 Group Vice President

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

SUBJECT: LOMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NOS. 50-445 AND 50-446
 SUPPLEMENTAL RESPONSE TO GENERIC LETTER 90-06

REF: TU Electric letter logged TXX-901053 from
 William J. Cahill, Jr. to USNRC dated
 December 21, 1990

Gentlemen:

The purpose of this letter is to supplement TU Electric's response to Generic Letter 90-06, position 2b, as requested in a telephone conference between the USNRC and TU Electric on April 14, 1992.

The guidance in Generic Letter 90-06 provided that stroke testing of Power Operated Relief Valves (PORVs) should be performed in MODE 3 or MODE 4. TU Electric responded in the referenced correspondence that PORVs would be stroke tested during cold shutdowns as required by ASME Section XI program.

Generic Letter 90-06 and NUREG 1316 provide little insight as to why MODE 3 or 4 may be desired, except to suggest that it would better simulate temperature and pressure environmental conditions. TU Electric recognizes the intent to perform testing under conditions as close as possible to the actual conditions under which components and systems are expected to perform their safety function. The impracticality of always doing this is also recognized. For instance, testing PORVs in MODE 1 is universally recognized as being impractical. TU Electric also considers routine testing of PORVs to be impractical under actual pressure and flow conditions because of the risk of losing the RCS inventory and the PORV sticking open. PORV stroking is therefore performed with the associated block valve shut.

If the intent is to have the surrounding environment as near to actual conditions as possible, then this has little to do with the plant mode at CPSES. The PORVs are influenced primarily by the ambient room conditions which do not show wide temperature variations in various plant modes and secondarily by the Pressurizer conditions (temperature, pressure). Plant mode is determined by RCS Temperature. The same pressurizer temperature (and therefore pressure) frequently exists in MODES 3, 4, or 5 so there is

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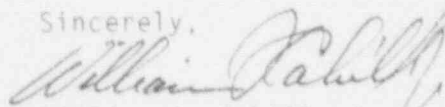
no difference from the valve perspective of being in different modes. The PORVs are not closely thermally coupled to the pressurizer because they are separated from the pressurizer by a minimum of 13.6 feet of pipe.

Another consideration for the CPSES PORVs is that RCS Pressure is applied under the valve seat and tends to assist the valve opening. From this perspective, lower pressure (as with the block valve isolating the PORV) is a more conservative test of the valve and valve operators' ability to open the valve.

It was also suggested that a possible consideration for MODE 3 or 4 testing was to have the PORV stroking performed at a time when it was not required for Low Temperature Overpressure Protection (LTOP). This would reduce the out of service time of the PORV and prevent reliance on the Technical Specification Action Statement. CPSES Technical Specification 3.4.8.3 allows either PORVs or RHR Suction Relief Valves to be used for LTOP protection; therefore, CPSES has the ability to test PORVs while satisfying Technical Specifications and LTOP concerns. No reduction in protection is necessary and no Action Statement entry is required.

One final consideration related to testing during MODE 3 or 4 is the added scheduling and plant impact. As stated above, there is no technical benefit for the added requirement. TU Electric generally views MODE 3 or 4 as a transient condition requiring the full attention of the operating staff to transition the plant to either MODE 5 or MODE 1 as the case may be. Added requirements during this period may not be consistent with the critical path activities needed to transition the plant. This could cause delay or distract attention from higher priority tasks. The more restrictive the prerequisite conditions for the test, the more difficult scheduling the activity becomes. Absent any obvious benefit of MODES 3 or 4 testing, these negatives make the added requirement not beneficial.

Sincerely,



William J. Cahill, Jr.

JLR/tg
Attachment

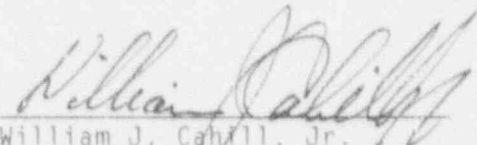
c - Mr. R. D. Martin, Region IV
Resident Inspectors, (2) CPSES
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Texas Utilities Electric Company) Docket Nos. 50-445
) and 50-446
(Comanche Peak Steam Electric)
Station, Unit 1 & 2)

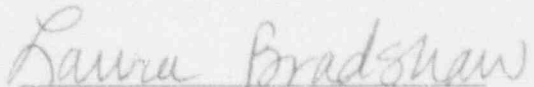
AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Generic Letter 90-06; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.


William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
COUNTY OF Somervell

Subscribed and sworn to before me, on this 27th day of May, 1992.


Notary Public

