



Log # TXX-92223
File # 10010
Ref. # 10CFR50 Appendix E
10CFR50.12

June 1, 1992

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
EMERGENCY RESPONSE DATA SYSTEM (ERDS) IMPLEMENTATION SCHEDULE

REF: 1) TU Electric Letter logged TXX-91383 from W. J. Cahill Jr. to
NRC dated October 28, 1991.

Gentlemen:

By NRC letter from T. A. Bergman to W. J. Cahill Jr., dated March 31, 1992, the NRC requested that TU Electric submit the following: first, the Unit 1 ERDS exemption request mentioned in the reference letter; and second, a detailed breakdown of the Unit 2 ERDS implementation schedule. TU Electric hereby submits a request for exemption and the requested Unit 2 schedule breakdown.

TU Electric requests a scheduler exemption from the requirements of 10CFR50 Appendix E (VI)(d). 10CFR50 Appendix E (VI)(4)(d) requires licensees to complete implementation of the Emergency Response Data System (ERDS) by February 13, 1993. The ERDS is a direct, near real time, data link whose purpose is to supplement the existing voice transmission Emergency Notification System (ENS). Both the ERDS and ENS provide the NRC information in the event of an emergency. The requested exemption would authorize delay of implementation of the ERDS until February 13, 1994.

The exemption is authorized by 10CFR50.12(a)(2)(v) which provides that an exemption may be granted if the exemption provides only temporary relief from the regulation. Additionally, the exemption is further authorized by 10CFR50.12(a)(2)(iii) which provides that the exemption may be granted if compliance would result in costs significantly in excess of those incurred by others similarly situated.

TU Electric plans to change out the Unit 1 computer system during the third refueling outage (1RF03). TU Electric will replace the current PRIME 750 computer, and its PRIMOS 18.3 operating system with a VAX 4000-300 computer and its VMS Version 5.4 operating system. TU Electric expects to install the ERDS hardware and software as part of the Unit 1 computer change out. 1RF03 is currently scheduled for the fourth quarter 1993. The exemption would delay implementation of the ERDS in Unit 1 for one year to accommodate the plant computer replacement.

9206120171 920601
FDR ADDCK 05000445
F PDR

400 N. Olive Street L.B. 81 Dallas, Texas 75201

A026
1/0

TXX-92223
page 2 of 2

If the exemption is not granted, TU Electric would be required to implement the ERDS on the present PRIME computer system and a year later on the new VAX computer system. Installation of the ERDS in both the PRIME and VAX systems would result in redundant costs and an unnecessary use of both licensee and NRC resources for acceptance testing.

TU Electric will install the ERDS modem in the new Unit 2 computer system by May 31, 1992. Preliminary testing of the modem installation will be complete by June 15, 1992. The NRC's contractor, Halliburton NUS Environmental Corporation, will be notified by letter after July 1, 1992, of the ERDS's installation availability for acceptance testing.

If you have any further questions, please contact Jose' D. Rodriguez at (214) 812-8674.

Sincerely,


William J. Cahill, Jr.

JDR/

c. Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. Tony P. LaRosa, NUS
Mr. John Jolicoeur, NRR
Mr. B. E. Holian, NRR
Mr. T. A. Bergman, NRR