

June 22, 1992

Docket Nos. 50-445
and 50-446

Mr. William J. Cahill, Jr.
Group Vice President
TU Electric
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Dear Mr. Cahill:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - COMANCHE PEAK STEAM ELECTRIC STATION, FINAL SAFETY ANALYSIS REPORT (FSAR), SECTION 14.2, AMENDMENTS 79 THROUGH 84 (TAC NOS. M81992, M81994, M81995, M81996, M82075, M82076) AND PROPOSED STARTUP TEST PROGRAM CHANGES (LTR TXX-92146)

The NRC staff has completed a preliminary review of Section 14.2 of your FSAR submittals through Amendment 84, in accordance with NUREG-0800, "Standard Review Plan." The staff has also reviewed the proposed startup test program changes described in your letter dated March 31, 1992. In order to complete these reviews, the staff requires additional information as indicated in the enclosure to this letter.

The reporting requirements contained in this letter affect fewer than ten respondents, therefore OMB clearance is not required under Public Law 96-511.

We request your response to the enclosed items within 30 days of the receipt of this letter to enable the staff to complete its review in a timely manner.

Sincerely,

Original Signed By

Brian Holian, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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Enclosure:
Request for Additional
Information

cc w/enclosure:
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Mr. William J. Cahill, Jr.

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June 22, 1992

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REQUEST FOR ADDITIONAL INFORMATION
FSAR CHAPTER 14.2
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-445 AND 50-446

The staff requests the following additional information for review of the FSAR through Amendment 84.

1. Table 14.2-3, Initial Startup Test Summaries, Sheet 33, Automatic Reactor Control System Test, indicates this test will be conducted at 50 percent power. Section 1A(B), Conformance to Regulatory Guide (RG) 1.68, "Initial Test Programs for Water-Cooled Nuclear Power Plants," is unclear regarding the power level at which this test is to be conducted. The Initial Startup Test Schedule shown in Figure 14.2-4 does not provide information regarding this test. Clarify test conditions regarding the Automatic Reactor Control System Test.
2. FSAR Section 1A(B), Conformance to Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," was revised to clarify the requirements of Regulatory Positions C.2.a.5, C.2.a.9, C.2.d, and C.3.b and to describe testing exceptions taken for Regulatory Positions C.2.a.3, C.2.c.2, and C.2.d (Amendment 78). The response to Q423.4, which requested justification for any exceptions to RG 1.108, states that CPSES complies with RG 1.108 as discussed in Appendix 1A(B) and the response to Q423.25. The response to Q423.12, Item 14 states that the Diesel Generators Test Summary has been expanded to conform to Regulatory Positions 2.a and 2.L of RG 1.108 (Rev. 1, August 1977). The response to Q423.25 states that the Diesel Generator Test Summary has been expanded to conform to Regulatory Positions 2.a.(5) and 2.b of RG 1.108 (Rev. 1, August 1977). Modify FSAR Section 1A(B), FSAR Table 14.2-2 (Sheet 34, "Diesel Generator Test Summary"), and the responses to Q423.4, Q423.12, Item 14, and 423.25, as appropriate, to address the following concerns:
 - a. Certain comments regarding Regulatory Positions specified in RG 1.108 are referred to as "clarifications" when they in fact are either alternate approaches or exceptions. These comments should be described as such and categorized in the appropriate discussion area.
 - b. Initial testing should demonstrate full-load-carrying capability for an interval of not less than 24 hours, of which 22 hours should be at a load equivalent to the continuous rating of the diesel generator and 2 hours at a load equivalent to the 2-hour rating of the diesel generator in accordance with RG 1.108, Regulatory Position C.2.a.(3). Testing at a lower-than-rated load is not adequate for initial testing, but may be adequate for subsequent testing dependent upon Technical Specification surveillance requirements.

- c. Design-accident-loading-sequence to design-load requirements are applicable for emergency diesel generator initial testing performed pursuant to RG 1.108, Regulatory Position C.2.a.(5), rather than shutdown-loading sequence to shutdown-load requirements.
 - d. The number of valid tests with no failures for each emergency diesel generator unit are to be from consecutive tests in accordance with RG 1.108, Regulatory Position C.2.a.(9). Valid tests and failures are as defined in Regulatory Position C.2.e.
 - e. Failures that are the seventh or greater in the last 100 valid tests should be reported as such and should include an assessment of the impact and applicability of these failures and their causes on the overall emergency power supply system availability and reliability, including implications for the other emergency diesel generator units, consistent with RG 1.108, Regulatory Position C.3.b.(1) through (5).
3. The response to Q423.2 describing preoperational testing was revised to delete test completion of the Nuclear Incore Instrumentation subsequent to fuel load and states that the Reactor Control System Test is the only preoperational test to be completed after fuel load (Amendment 78). The response to Q423.10 does not identify any additional preoperational tests intended to be completed after initial fuel load. The response to Q423.23, Item 1 states that Figure 14.2-3 has been revised to correctly reflect the response to Q423.10. Figure 14.2-3 shows that the following additional preoperational tests will be completed after initial fuel load:
- * Incore Nuclear Instrumentation
 - * Auxiliary Startup Instrumentation
 - * Operational Vibration Tests

For each of these tests, either modify Figure 14.2-3 to show that these tests will be completed prior to fuel load, or modify the response to Q423.10 to: (1) state what portions of each test will be delayed until after fuel loading, (2) provide technical justification for delaying these portions, and (3) state when each test will be completed (key responses to operating modes defined in Technical Specifications or to power ascension test power levels defined in Chapter 14).

4. The response to Q423.16, Item 2 was revised to state that the performance of process and area radiation monitoring equipment shall be demonstrated during startup testing for Unit 1 by comparison of monitor indication with the results of radiochemical analysis, and refers to Table 14.2-2, Sheet 24A and Table 14.2-3, Sheet 13A for Unit 2 (Amendment 81).

These changes remove the demonstration of process and area radiation monitoring equipment under operating conditions for Unit 2. Either modify Table 14.2-3 and the response to Q423.16, Item 2, as appropriate to reinstate demonstration of this capability for Unit 2 or provide technical justification for this exception to RG 1.68, Appendix A, Item 5.2 in FSAR Section 1A(B).

5. The changes in conformance to Regulatory Positions C.1.a and C.3 of Regulatory Guide 1.68.2, "Initial Startup Test Program To Demonstrate Remote Shutdown Capability for Water-Cooled Nuclear Power Plants," described in TU Electric letter TXX-92146 dated March 31, 1992, are unacceptable. The demonstration of remote shutdown capability for Unit 2 should conform to the guidance provided in RG 1.68.2.