

SEP 21 1984

Docket Nos.: 50-445
and 50-446

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive Street
Lock Box 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Comanche Peak FSAR Amendment 52, Table 14.2-3, Sheet 23

From its review of Comanche Peak FSAR Amendment 52, the staff found that your description of the Turbine Trip/Generator Load Rejection Test Summary (FSAR Table 14.2-3, Sheet 23) appears to be inconsistent with the guidelines of Regulatory Guide 1.68, "Initial Test Program for Water - Cooled Nuclear Power Plants," Revision 0, Appendix A, Paragraph D.1.h and your response to Q423.22, Part 3. The change made in FSAR Table 14.2-3, Sheet 23 in Amendment 52 indicates that the test will be a "net load rejection," in lieu of a full load rejection. Paragraph D.1.h of Regulatory Guide 1.68, Appendix A specifies that a turbine trip be accomplished at 100% power. Revision 2 to Regulatory Guide 1.68 allows inclusion of the turbine trip demonstration with the generator load rejection test (Appendix A.5.1.1 and A.5.n.n) if the turbine trip is initiated by manual or automatic generator trip. Your response to Q423.22, Part 3, states that the response of the plant to the case of full load rejection will be performed.

Accordingly, the Turbine Trip/Generator Load Rejection Test Summary should be modified to perform a full load rejection, or FSAR 1A(B) should be modified to take exception to this position of Regulatory Guide 1.68. It is requested that you make the above modification in the next FSAR amendment. If you plan to take exception to Regulatory Guide 1.68, the basis for such exception needs to be provided.

Sincerely,

151
B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

cc: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Sincerely,

A handwritten signature in dark ink, appearing to read "B. J. Youngblood".

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

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COMANCHE-PEAK

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