



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUL 24 1992

Docket No. 50-445
License No. NPF-87

TU Electric
ATTN: W. J. Cahill, Jr., Group Vice President
Nuclear Engineering and Operations
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

This acknowledges the granting of a temporary waiver of compliance to Comanche Peak Steam Electric Station, Unit 1 (CPSES-1), from the provision of Technical Specification (TS) Limiting Condition for Operation (LCO) Section 3.3.2, Table 3.3-2, Functional units 4b (steam line isolation) and 6a (auxiliary feedwater), "Automatic Actuation Logic and Actuation Relays." This waiver allows CPSES-1 to modify and test both trains of the Solid State Protection System (SSPS) while remaining in Mode 3, and thus avoid a change to Mode 4 within 6 hours per TS LCO requirements. The period of the waiver of compliance is 24 hours, to commence from the time when a step in the work plan makes the channels inoperable in either train of the SSPS. The staff understands that both trains of the SSPS channels will be restored to operable status upon completion of the work. Your letter (TX-92356) to this office, dated July 23, 1992, provides the written basis for the temporary waiver of compliance that you requested on July 23, 1992.

Based on your written notification and on a telephone call to Mr. Pat Gwynn from Mr. Don Woodlan, a temporary waiver of compliance to the previously mentioned functional units of TS LCO 3.3.2 was granted at 4:18 a.m., on July 23, 1992, by Region IV, with the concurrence of the Office of Nuclear Reactor Regulation. This one-time waiver allows CPSES-1 to remove each train of the SSPS channels from service one at a time for a period not to exceed 24 hours total during the modification and testing activities. We understand that the bases for avoiding Mode 4 operation are 1) to expedite both testing and modifications, and 2) to avoid an unnecessary plant thermal transient. Region IV performed an evaluation of your written documentation and found it justified the basis for your request for a temporary waiver of compliance. Other factors which affected the approval for a waiver of compliance were the compensatory measures to be taken by the licensee's operations staff in the crew preparation, supervision, and control during the actual evolution; engineering evaluations of the safety significance of removing each train of the SSPS from service; and the Station Operations Review Committee's review and approval of the work plan and waiver request.

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TU Electric

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If your understanding of this matter differs from that expressed above, or if you have any questions regarding this matter, please contact me.

Sincerely,


James L. Milboan
Regional Administrator

cc:

TU Electric

ATTN: Roger D. Walker, Manager of
Regulatory Affairs for Nuclear
Engineering Organization

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Juanita Ellis

President - CASE

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TU Electric

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Texas Department of Labor & Standards
ATTN: G. R. Bynog, Program Manager/
Chief Inspector
Boiler Division
P.O. Box 12157, Capitol Station
Austin, Texas 78711

Honorable Dale McPherson
County Judge
P.O. Box 851
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Texas Radiation Control Program Director
1100 West 49th Street
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Owen L. Thero, President
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TU Electric

bcc to DMB (IE01)

bcc distrib. by RIV:

J. L. Milhoan

DRP

Lisa Shea, RM/ALF, MS: MNBB 4503

DRSS-FIPS

Project Engineer (DRP/B)

DRS

C. Hrabal, DRP/B

Resident Inspector (2)

Section Chief (DRP/B)

MIS System

RSTS Operator

RIV File

Chief, Technical Support Section

RIV:APE:DRP/B
CAHrabal;df
7/24/92

C:DRP/B
LAYandett
7/24/92

D:DRS
SJCcollins
7/24/92

D:DRP
ABBeaci.
7/24/92

NRR
MJVirgilio
7/24/92

per telus

RA
JLMilhoan
7/24/92

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LAYandell
7/26/92

D:DRS
KJCollins
7/24/92

D:DRP
ABBeach
7/24/92

VMJ
NRR
for MJVirgilio
7/24/92
per tabson

JLMilhoan
RA
JLMilhoan
7/24/92

IE01