

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

March 27, 1985

JOHN W. BECK
MANAGER-LICENSING

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION

Dear Mr. Youngblood:

In response to NRC request for additional information dated January 7, 1985, the following is provided:

- Q1. FSAR amendment 50 added the underlined words to a commitment regarding QA for fire protection: "The Fire Protection System supplier will be covered by the applicant's audit and surveillance program or Underwriters Laboratory surveillance programs." (FSAR page 9.5.51). Provide assurance that the Underwriters Laboratory surveillance programs require supplier controls that are at least equivalent to those required by TUGCO's audit and surveillance program.
- R1. TUGCO has compared the Underwriters Laboratory (UL) surveillance program against TUGCO's Audit and Surveillance Program for supplier controls. In accordance with Appendix A to BTP APCSB 9.5-1 TUGCO is committed as follows:

"Audits should be conducted and documented to verify compliance with the Fire Protection Program, including design and procurement documents, instructions, procedures and drawings, and inspection test activities." For items carrying a UL listing, the Underwriters Laboratory program addresses these points as follows:

1. a. Establishes design and performance criteria.
- b. Establishes performance standards (used to perform evaluations and tests).
- c. Develops requirements (where performance standards are lacking) in the form of inspections and tests with appropriate acceptance criteria.
- d. Provide UL labeling on items meeting UL requirements.

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2. a. Performs periodic examinations and/or tests conducted at the manufacturing facility.
- b. Determines compliance to UL by periodic random sampling of items carrying a UL listing.
- c. Items found not to be in compliance are required to be corrected or the UL listing (label) removed from that item.
- d. UL maintains documentation of its testing, surveillance and inspections.

The UL listing and the listing surveillance program are industry recognized and accepted standards. UL provides an appropriate level of supplier controls commensurate with the level of safety required of fire protection systems. Based on the above, it is the CPSES position that the UL surveillance program meets the requirements of the TUGCO Fire Protection Audit and Surveillance Program.

- Q2. FSAR amendment 53 deleted the underlined words from a commitment regarding QA for instructions and procedures: "These procedures and instructions are reviewed by the SORC and approved by the Manager, Plant Operations." (FSAR page 17.2-19). Identify (by position title) who performs the QA review of these documents and who approves them.
- R2. Safety-related procedures that are utilized to control activities at CPSES which affect safety-related systems, structures, or components are reviewed by the Operations Quality Assurance Section. The purpose of this review by the Operations Quality Assurance Section is to ensure the procedure satisfies the applicable quality assurance requirements. SORC will review procedures as before. The Operations Assurance Supervisor as a member of SORC is responsible for this review and for recommending approval of this procedure. Approval of these procedures is the responsibility of the Manager, Plant Operations.

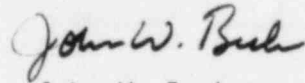
Safety-related instructions that are utilized to perform detailed work activities which are unique to a particular department or section and do not have a significant impact on other departments or sections beyond that department's or section's normal responsibilities are reviewed by the Operations Quality Assurance Section staff personnel. Approval of safety-related instructions is the responsibility of the individual specified in writing by the Manager, Plant Operations. This change was necessary because instructions were added which do not warrant SORC review.

- Q3. Before amendment 53, there was commitment in the FSAR that maintenance, modification, and inspection procedures "are reviewed by the Operations QA Supervisor. . ." Amendment 53 changed this to state that the Operations QA Supervisor, "is responsible for providing the necessary reviews. . ." (page 17.2-22). Clarify what personnel (organizationally) perform these reviews. If not part of TUGCO's QA organization, describe the QA qualifications of these personnel.

- R3. Maintenance, modification and inspection procedures and instructions affecting safety-related equipment are reviewed by Operations Quality Assurance Section personnel supervised by the Operations Quality Assurance Supervisor. There is no intent change.
- Q4. FSAR amendment 53 deleted the commitment that maintenance, repair, and modification procedures and instructions be reviewed by the Operations QA Supervisor but left intact the commitment that these procedures and instructions containing inspection criteria are reviewed by a Level III inspector (pages 17.2-27/28). Identify (by position title or organization) who performs the QA review of these documents which do not contain inspection criteria. If not part of TUGCO's QA organization, describe how TUGCO's QA organization verifies that no inspection is required.
- R4. The first sentence at the top of page 17.2-28 will be revised to read as follows: "In addition all safety-related plant procedures and instructions are reviewed by the Operations QA Section to assure that the required quality assurance requirements have been included." "QA" from this sentence was unintentionally left out of Amendment 53.
- Q5. FSAR amendment 53 introduces the concept and discusses the use of "partial dispositions." Describe the authority and responsibilities of TUGCO's QA organization in the use of partial dispositions.
- R5. The operations QA supervisor is responsible for the review and approval of all non-conformance report dispositions. In this capacity he assigns members of the Operations QA Section to review and, if acceptable, approve all partial and final dispositions, after engineering approval and prior to implementation.
- Q6. It appears that about one page of printed material on pages 17.2-37 and 17.2-38 of the December 17, 1982 version of the FSAR has been inadvertently omitted from between pages 17.2-36 and 17.2-37 of FSAR amendment 53. Clarify.
- R6. The portions of pages 17.2-37 and 17.2-38 omitted in Amendment 53 will be replaced in Amendment 55.
- Q7. FSAR amendment 53 added PORV accumulators on sheet 1 of table 17A-1. Add note "A" to the Quality Assurance column for these accumulators or justify not doing so.
- R7. Note "A" will be added to the Quality Assurance column for PORV accumulators in amendment 55.
- Q8. FSAR amendment 53 added 4 items of the CPSES fire protection system to sheet 35 of table 17A-1. Add an appropriate operation QA note from sheet 50 of the table or justify not doing so.
- R8. Amendment 55 will add note "D" to the Quality Assurance column for the following items on sheet 35 under Fire Protection System: Fire Suppression Systems, Fire Doors, Portable Fire Extinguishers, and Fire Rated Coating Systems.

- Q9. The fourth item on sheet 32 of table 17A-1 speaks of "125-VAC station batteries." It appears these are 125-VDC items. Clarify.
- R9. The fourth item on sheet 32 of table 17A-1 will be revised in Amendment 55 to read: "125-VDC station batteries."

Sincerely,

A handwritten signature in cursive script that reads "John W. Beck".

John W. Beck

BSD/grr