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TU ELECTRIC

January 20, 1993

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
ADDITIONAL INFORMATION CONCERNING CPSES
FSAR CHAPTER 12.5, "RADIATION PROTECTION"

REF: TU Electric letter logged TXX-92568 from
Mr. William J. Cahill, Jr. to USNRC dated
December 18, 1992

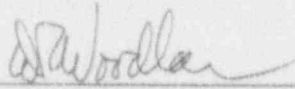
Gentlemen:

The referenced letter submitted Amendment 87 to the CPSES FSAR and included a revision to FSAR Chapter 12.5, "Radiation Protection". The NRC staff reviewed this revision and requested that additional information be provided. The NRC staff questions and TU Electric responses are provided in the attachment to this letter.

If there are any questions, please contact Mr. Connie L. Wilkerson at (214) 812-8819.

Sincerely,

William J. Cahill, Jr.

By: 
D. R. Woodlan
Docket Licensing Manager

CLW/grp
Attachment

- c - Mr. J. L. Millhan, Region IV
Resident Inspectors, CPSES (2)
- Mr. T. A. Bergman, NRR
- Mr. B. E. Holian, NRR
- Mr. Jack Bell, NRR

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Handwritten initials/signature

REQUEST FOR ADDITIONAL INFORMATION - AMENDMENT 87
TO CPSES FSAR CHAPTER 12.5, "RADIATION PROTECTION"

NRC Question 1:

The FSAR now indicates (Page 12.5-1) that the utility will not have the benefit of a Corporate "Health Physics Supervisor". Although specific details of the Supervisor's duties and responsibilities are not provided, it is stated that the "Supervisor is available for guidance and consultation and periodically visits CPSES to review and inspect the radiation protection program". Independent, Corporate level advice to, and assessment of, the radiation protection program is a valuable asset as would be Corporate level representation of the radiation protection program. The position of "Health Physics Supervisor" would, apparently, be established only after careful consideration of the benefits of having such a position in the organization.

It would be very helpful if the licensee would give us the benefit of its thinking with respect to elimination of the Supervisor's position and the manner in which the Supervisor's duties and responsibilities will be implemented within the revised organization.

TU Electric Response 1:

In 1991 a TU Electric management decision resulted in the dissolution of the Dallas based Corporate Health Physics Section comprised of the Corporate Health Physics Supervisor and three staff engineers. This decision was based on improving organizational efficiency and consolidating resources between groups with similar (duplicative) responsibilities. The principal functions of the Corporate Health Physics Section were to provide special technical and task assignment support to the CPSES Radiation Protection Department and to provide independent review/assessment of the CPSES Radiation Protection and Emergency Preparedness Programs. The functions and part of the resources (i.e., personnel, office equipment and technical reference materials) were transferred/supplemented into either the CPSES Radiation Protection or Nuclear Overview Departments. The original functions of the Corporate Health Physics Supervisor, i.e., provide special technical/task assignment support and independent review/assessment of Radiation Protection and Emergency Preparedness Programs, are now handled under the organizational responsibilities of the CPSES Radiation Protection Manager and Director of Nuclear Overview, respectively.

Additionally, TU Electric's past nuclear operations organization was partly based on proposed multi-nuclear sites and senior Corporate nuclear organization executives were officed in the Dallas general offices. Currently TU Electric has only one nuclear site (CPSES) and senior Corporate nuclear engineering and operations executives are officed onsite to maximize organizational efficiency and place resources at the work location. The independence of the subject health physics review/assessment function is maintained by the fact that the Director of Nuclear Overview has no responsibility for operations, but reports directly to the Group Vice President, Nuclear Engineering and Operations, and is responsible for the

independent review groups of Plant Analysis (incident root-cause analysis), Quality Assurance (QA surveillance and audits) and Independent Safety Engineering Group (special independent safety review and assessment). The Director of Nuclear Overview responsibilities for providing an independent review of CPSE's Radiation Protection and Emergency Preparedness Programs are described in CPSES FSAR Chapter 13.1.

NRC Question 2:

Table 12.5.1, Sheet 2 of the proposed change indicates that the plant will have one Gas Proportional Counter and one Liquid Scintillation Counter for both units. The current FSAR indicates that three of such counting systems will be available.

It is not clear how the plant could conduct an effective radiation protection program, especially during outages, without a "backup" counting system of each type. What does the licensee plan to do if one or both of these systems become nonfunctional?

TU Electric Response 2:

A "backup" capability is available onsite with respect to Gas Proportional and Liquid Scintillation Counters. The Radiation Protection Department has more than one Gas Proportional Counter. The Chemistry Department maintains one Liquid Scintillation Counter and a second Liquid Scintillation Counter is available onsite in the Nuclear Training Department.