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WESTEC Services, Inc.

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July 31, 1985

Mr. J. A. Calvo, Group Manager
Comanche Peak Task Force
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20814

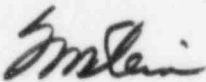
Subject: Comments on the Draft Input to the Safety Evaluation Report on Comanche
Peak Response Team Program Plan.

Dear Mr. Calvo:

As you requested in our telephone conversation this date, I am forwarding our comments on the subject document. Although we feel that all the comments originally transmitted in our memorandum of July 16, 1985 are significant areas of concern which should be addressed in the subject report, the attached comments reflect concerns which, as a minimum, should be addressed in the report due to their programmatic nature, or to correct inaccuracies in the draft. The balance of our comments will be reserved for reviewing the checklists (to be submitted at a later date) as you suggested.

If you have any further questions, please contact us.

Sincerely,



S. M. Klein
Principal Engineer

Enclosure

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COMMENTS ON DRAFT INPUT TO SAFETY EVALUATION REPORT ON
COMANCHE PEAK RESPONSE TEAM PROGRAM PLAN AND ISSUE SPECIFIC ACTION PLANS -
REVISION 2 (FROM THE SYSTEMS/OPERATION GROUP OF THE NRC COMANCHE PEAK TASK
FORCE DATED 7/22/85)

Reference: WESTEC Services, Inc. memorandum to J. A. Calvo (NRC) from
G. W. Morris (WESTEC), "Review of the CPRT Design Adequacy
Program, dated July 16, 1985.

Comment 1 (Appendix X, page 5):

Delete Item 3 concerning heat removal capability. This statement is not completely accurate since the AFW is specifically designed to remove decay heat prior to the initiation of residual heat removal via the residual heat removal system. Heat removal is effected through proper design of the system to provide adequate condensate storage capacity and AFW flow to assure that reactor decay heat is rejected through the steam generators consistent with the durations dictated by plant design criteria (For this reason, this item had previously been omitted from the comments transmitted by the referenced memorandum). This same comment is repeated in Item 5 of Appendix X, page 18. and should be deleted.

Comment 2 (Appendix X, page 18):

We feel that Item 8 (requesting the review of seismic class changes within the system) should be expanded to include the more programmatic issues discussed in our original Comment (37) transmitted in the referenced memorandum and reproduced here for your convenience -

"This appears to address the effects of non seismic piping on seismic or safety related piping. However, the review should also address non seismic equipment and components. Review the methods used to identify non-seismically supported and/or non-seismically designed components, e.g., non seismic fans, pumps, instrument racks, duct work, lighting, platforms and grating, whose failure could affect or compromise the ability of safety-related components to perform their safety functions."

Comment 3:

We feel that the following comments (as a minimum) transmitted by the referenced memorandum should be incorporated in the subject document (numbers are those comment numbers indicated in the memorandum):

Comments 24 a and b - Addresses heat removal capabilities of the AFW more accurately than contained in Appendix X, page 5, Item 3.

Comment 45 - Addresses review of field changes not specifically covered in the CPRT Program Plan.

Comment 51 - Addressed review of subcontracted areas of design.