

TEXAS UTILITIES GENERATING COMPANY
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WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT

December 16, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. Vince S. Noonan, Director
Comanche Peak Project
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
EMERGENCY RESPONSE GUIDELINE USE
DURING CONTAINMENT SUMP RECIRCULATION

Dear Mr. Noonan:

The purpose of this letter is to provide an explanation of the use of the Emergency Response Guidelines in the operation of Comanche Peak Steam Electric Station with particular reference to an emergency condition involving containment sump recirculation.

BACKGROUND:

The Emergency Response Guidelines are made up of the following:

1. Optimal Recovery Guidelines (EOP, EOS)
2. The Emergency Contingency Guidelines (ECA)
3. The Critical Safety Function Restoration Guidelines (FRG)

The Optimal Recovery Guidelines and the Emergency Contingency Guidelines provide guidance for control room personnel to recover the plant from upset, emergency and faulted conditions. The Critical Safety Function (CSF) Status Trees provide a systematic means for addressing any challenge to critical safety functions of the plant. This process is entirely independent of the initiating event or plant state. The availability of these types of procedural guidance permits the control room personnel to respond to any plant off normal condition, including multiple failure conditions, and failures subsequent to initial diagnosis which could require additional operator action beyond that which is specified in the Optimal Recovery Guidelines or Emergency Contingency Guidelines.

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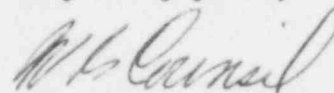
USE OF THE EMERGENCY RESPONSE GUIDELINES:

The Emergency Response Guidelines will be used at Comanche Peak in the following fashion:

1. Immediately following a Reactor Trip or Safety Injection (or symptoms of either), the Reactor Operator will immediately perform the first 10 steps of EOP-0.0 which are required to be performed without delay.
2. The Assistant Shift Supervisor will then verify with the procedure in hand that all the above steps have been performed.
3. The control room personnel will then assume the following positions for the duration of the accident condition:
 - a. The Shift Supervisor will oversee the accident condition mitigation and recovery at all times.
 - b. The Assistant Shift Supervisor, under the direction of the Shift Supervisor, will be in charge of determining the correct procedure flow path and directing the operators in the performance of procedural steps needed to return the plant to a stable condition.
 - c. The Reactor Operator and the Relief Reactor Operator will perform steps of the specific procedures as directed by the Assistant Shift Supervisor.
 - d. The STA will provide updates to the Shift Supervisor and Assistant Shift Supervisor on the CSF trees by monitoring the Safety Parameter Display System (SPDS).

A verification process also exists at CPSES for the proper use of the Emergency Response Guidelines. This verification is provided by the Assistant Shift Supervisor and the reactor operator exchanges while performing the Emergency Response Guidelines. The Assistant Shift Supervisor directs the reactor operators step by step with response from these two individuals on completion of each step. This coordinated use of the Emergency Response Guidelines provides a means of continuously monitoring the plant critical safety functions (through use of the status trees), permits optimal plant recovery (through use of the Optimal Recovery Guidelines), and directs systematic operator response to conditions outside the area of the Optimal Recovery Guidelines (through use of Emergency Contingency Guidelines and Critical Safety Function Restoration Guidelines).

Very truly yours,



W. G. Council

JSM/arm