

FEB 28 1986

Docket Nos.: 50-445
and 50-446

Mr. W. G. Council
Executive Vice President
Texas Utilities Generating Company
400 North Olive Street, L. B. 81
Dallas, Texas 75201

Dear Mr. Council:

SUBJECT: REQUEST FOR CHANGE TO CPSES TECHNICAL SPECIFICATIONS
CONCERNING REPLACEMENT OF MSIV BYPASS VALVE ACTURATORS

By letter dated May 17, 1985, Texas Utilities requested changes to the Comanche Peak technical specifications to allow the use of manual operators on the main steam isolation valve (MSIV) bypass valves. In addition, by letter dated July 10, 1985, Texas Utilities submitted an evaluation performed to determine the impact of the MSIV bypass valve actuator replacement on plant safety. The staff has reviewed your request and safety evaluation and has prepared the enclosed request for additional information with regard to impact on occupational radiation exposure. In addition, the staff has provided comments on your proposed changes to the technical specification as marked in your May 17, 1985, submittal and FSAR changes provided in Amendment 56. Should you have any questions concerning the enclosed request, contact Annette Vietti-Cook, Project Manager on telephone number (301) 492-8083.

Vincent S. Noonan, Director
PWR Project Directorate #5
Division of PWR Licensing-A

Enclosure: As stated

cc: See next page

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DATE	: 2/19/86	: 2/19/86	: 2/21/86	: 2/27/86	:	:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 27 1986

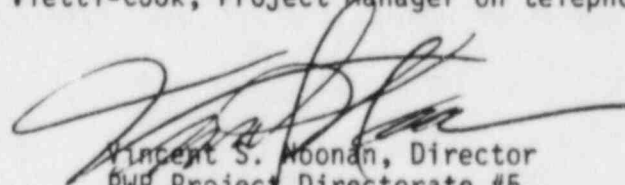
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Enclosure: As stated

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Texas Utilities Generating Company

Comanche Peak Steam Electric Station
Units 1 and 2

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Request For Additional Information

- (1) Address the operation of the MSIV bypass valve by "handwheel" manual actuation and provide information on operator radiation exposure based on its location, dose rate in the area that must be accessed and occupied for its actuation, the time spent in the area, and the frequency of need to actuate, maintain, service, etc., the valve under normal and emergency plant conditions.
- (2) Describe the occupational radiation exposure in terms of man-rem that will be received as compared to that which would have been received under the previously installed automatic operating conditions.
- (3) During Mode 2, if a Steam Generator Tube Rupture event were to occur, would the environment, e.g., radiation level/temperature, permit an operator to manually close the valve without exceeding part 10 CFR 20 guidelines?
- (4) Assuming fuel failure before or during the tube rupture described in 3 above, what is the maximum time available to complete valve closure before radiation exposure becomes excessive per 10 CFR part 20 and/or offsite doses becomes excessive per 10 CFR Part 100?

Comments On Mark Up To Technical Specifications

Page

1. 3/4 6-21 Refer to Table 3.6-1; Containment Isolation Valves;
4. Manual Valves; Insert A. Valve numbers marked
1HV imply power operated, 1HV should be changed to
1MS.

2. 3/4 6-26 Refer to Table 3.6-1; Containment Isolation Valves;
7. Steam Line Isolation Signal; Valve 1HV-2323 A;
under Line or Service. Currently this reads "Main
Steam From Generator #1". This should read, "Main
Steam From Steam Generator #1".

3. 3/4 6-27 Refer to Table 3.6-1; Containment Isolation Valves;
7. Steam Line Isolation Signal (Continued); Valve
1HV-2411; under Line or Service. Currently this
reads "Main Steam From Steam Generator #3. This
should read, "Drain From Main Steam Line #3".

4. 3/4 6-30 Refer to Table 3.6-1; Table Notations, Note 11.
Should read, "All four MSIV Bypass Valves are
locked closed in Mode 1. During Modes 2, 3 and 4 one
MSIV Bypass Valve may be opened provided the other
three MSIV Bypass Valves are locked closed and
their associated MSIVs are closed."

Comments On FSAR Amendment 56

FSAR Section 3.9B Mechanical Systems and Components

1. Refer to Table 3.9B-8; Sheet 5; ASME Code Class 2 and Class 3. Active and Inactive Pumps and Valves; Main Steam Reheat and Steam Dump System. Are b and e the same now? Should b be deleted?
2. There is a conflict between Table 3.9B-8; sheet 5, and Table 3.9B-10 sheet 1 of 12. HV-2333B, HV-2334B, HV-2335B, HV-2336B should be deleted from the Active Valve list.

FSAR Section 6.2 Containment Systems

3. Assuming Table 6.2.4-2 Sheet 1 of 10 is for both Active and Inactive valves, the "HV" designator should be changed on the MSIV bypasses and the primary method of actuation should be "Local Manual" to clearly differentiate from the remote manual actuators.
4. On Table 6.2.4-3 Sheets 1 and 2 of 14, the containment isolation signal for items 2, 7, 11, and 15 should be deleted since they no longer receive a containment isolation signal.
5. Figure 6.2.4-1; Sheet 5 of 10; Valve arrangement 17; Outside Containment; should indicate locked closed.

FSAR Section 10.3

6. In Section 10.3.2.3.1, justify the elimination of the need for main steam isolation valves to stop flow from either direction within 10 seconds after a steam line break to prevent uncontrolled steam releases from more than one steam generator (Page 10.3-7 and 10.3-9 Amendment 56).
7. The words "an integral" should be removed and replaced with "a manual" (Page 10.3-7 Amendment 56).
8. Should the bypass valve be locked closed during "power operation" or when "containment integrity" is required (Page 10.3-7 Amendment 56)?
9. The following sentence should be deleted; "Each MSIV bypass valve also has a two train module, open, close and auto switch on the control board." (Page 10.3-8 Amendment 56).
10. The following sentence should be deleted; "There is no provision for testing the bypass valves." (Page 10.3-9 Amendment 56).
11. Refer to Section 10.3.2.4; Main Steam Isolation Bypass Valves. This paragraph should clearly explain that all four MSIV bypass valves are locked closed in Mode 1. During Modes 2, 3, and 4 one MSIV bypass valve may be opened provided the other three MSIV bypass valves are locked closed and their associated MSIVs are closed.
12. Refer to Figure 10.3-1; Sheet 1. Designation HV should be replaced with MS for the subject valves.