

Log # TXX-88683
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 Ref. # 10CFR50.55(e)

TUELECTRIC

October 5, 1988

William G. Council
Executive Vice President

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NOS. 50-445 AND 50-446
 COMS ACTUATION DURING ACCIDENT EVENTS
 SDAR: CP-88-30 (FINAL REPORT)

Gentlemen:

On July 18, 1988, we notified you by our report logged TXX-88567 of a deficiency involving Cold Overpressure Mitigation System (COMS) actuation during accident events. Specifically, an unanalyzed condition results during a Main Steamline Break (MSLB) or during recovery from a Steam Generator Tube Rupture (SGTR) when the reactor coolant temperature in the faulted loop cold leg drops below the COMS auto-arming temperature. If a different wide range temperature channel, which satisfies the actuation logic, is assumed to fail low, the COMS will actuate. This postulated scenario, which results in an unintended RCS depressurization, was not considered in the accident analyses. As described below, further evaluation has determined that this item is not reportable under the provisions of 10CFR50.55(e).

In the FSAR Chapter 15 analyses of the MSLB and SGTR events, single failures were considered in the systems required for accident mitigation in accordance with the requirements of 10CFR50, Appendix A. The analyses satisfy the general design criteria for these systems.

The postulated random failure of a wide range temperature channel during a MSLB or SGTR event, which results in COMS actuation, has the following characteristics:

1. The failure does not occur in a system required to mitigate the initiating event.
2. The failure is neither a consequence of the initiating event nor an undetectable failure.
3. The failure must be present immediately prior to and/or immediately following the initiation of the event. If the failure existed before the time frame immediately preceding the event, the failure would be readily apparent in the control room via an alarm.

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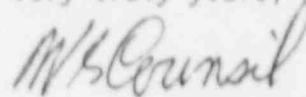
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The random, simultaneous, independent failure of the wide range temperature channel during a MSLB or SGTR event is not considered a credible failure. Therefore, this postulated failure need not be considered in the design of the COMS.

Based on the above evaluation, we have determined that had this issue remained unidentified, no condition adverse to the safety of plant operations would have existed. This issue is not reportable under the provisions of 10CFR50.55(e).

Very truly yours,



W. G. Council

VPC/gj

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)