TU ELECTRIC

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10010
Ref. # 10 CFR 50.90
10 CFR 50.36

C. Lance Terry
Senior Vice President
& Principal Nuclear Officer

February 25, 1998

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
SUBMITTAL OF LICENSE AMENDMENT REQUEST 98-002
A.C. POWER, OPERATING

REF: 1) TU Electric Letter, logged TXX-98049, from C. L. Terry to the NRC dated February 20, 1998

Gentlemen:

Pursuant to 10CFR50.90, TU Electric hereby requests an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating the attached change into the CPSES Units 1 and 2 Technical Specifications. The change is applicable to both CPSES Unit 1 and CPSES Unit 2.

On February 20, 1998, at about 2:30 pm central time, TU Electric participated in a conference call with the NRC staff. The subject of the call was the request for enforcement discretion submitted to the NRC earlier that day in TU Electric letter TXX-98049 (reference 1). The NRC had six comments. Those comments are paraphrased below along with the responses provided by TU Electric:

1. Section 2 of the letter, "Circumstances," does not discuss the root cause of the failure to demonstrate the load shedding feature for MCC XEB4-3.

TU Electric's response: The root cause of this event has not yet been determined. The root cause will be determined as required by the CPSES corrective action processes. To the extent required by 10 CFR 50.73, root cause will be discussed in the License Event Report (LER) to be issued for this event.

2. Section 3 of the letter, "Safety Significance and Potential Consequences," did not include at least a qualitative risk assessment derived from the licensee's PRA.

TU Electric's response: The deterministic assessment as provided in the letter is that continued operation in the current condition poses no adverse consequences. The PRA experts at CPSES have evaluated continued operation of the plant without demonstrating the load shedding feature of MCC XEB4-3 and

have qualitatively concluded that such continued operation would have no impact of significance on the existing PRA for CPSES.

3. In Section 10 of e letter, TU Electric committed to provide a License Amendment Request (LAR) by March 9, 1998. This date is not soon enough to meet NRC guidance.

TU Electric's response: TU Electric agreed with the NRC staff to a submittal date for the LAR of February 25, 1998.

4. The proposed LAR should allow the temporary exclusion of the subject demonstration until startup subsequent to the next refueling outage for each unit or until the next outage on each unit of sufficient duration to perform the required testing.

TU Electric's response: TU Electric agreed with the comment and agreed to change the LAR accordingly. The NRC staff and TU Electric agreed that an outage of sufficient duration included sufficient time to both setup for and perform the required testing. A specific outage length could not be confirmed as it is not clear at this time if the testing should be performed as part of the entire integrated test or if this feature may be tested separately.

5. The NRC's guidance for enforcement discretion requires the licensee to provide marked up pages of the technical specifications if an LAR will be required.

TU Electric's response: The marked up page of the CPSES Technical Specification was provided as committed.

6. The NRC staff asked that TU Electric address the separation between Class 1E and non-Class 1E circuits as it relates to this MCC.

TU Electric's response: As shown on FSAR Figure 8.3-12, Sheet 2, MCC XEB4-3 is non-Class 1E. The MCC is powered from either MCC 1EB4-3 (CPSES Unit 1) or 2EB4-3 (CPSES Unit 2). Both 1EB4-3 and 2EB4-3 are Class 1E (train B for their respective units). Separation is provide by the feeder breakers on the Class 1E MCCs. These feeder breakers are tripped by a safety injection signal from their respective units. The operability of this trip feature is demonstrated by the quarterly slave relay testing of the Automatic Actuation Logic and Actuation Relays for Safety Injection (see Table 4.3-2, Channel Functional Unit 1.b. of the CPSES Technical Specifications). The feeder cables from the feeder breakers to MCC XEB4-3 are Associated Class 1E (Train BB). Table 8.3-10 of the FSAR lists MCC XEB4-3 as a non-safety load fed by associated cables, after isolation, where separation from internal non-Class 1E circuits within the equipment is not required.

This license amendment request (LAR) proposes a temporary change to the Technical Specifications to remove the requirement to demonstrate the load shedding feature of MCC XEB4-3 as part of Surveillance Requirements (SRs) 4.8.1.1.2f.4)a) and 4.8.1.1.2f.6)a) until the plant startup subsequent to the next refueling outage for each respective unit or until an outage of sufficient duration to properly schedule and perform the test. This

temporary change is requested as a result of the failure to confirm the load shedding feature of MCC XEB4-3 during the last performance of these SRs for the Unit 1 and Unit 2 train B diesel generators (DGs).

Attachment 1 is the required affidavit. Attachment 2 provides a detailed description of the proposed changes, a safety analysis of the changes, and TU Electric's determination that the proposed changes do not involve a significant hazard consideration. Attachment 3 provides the affected Technical Specification page, marked-up to reflect the proposed changes.

This LAR is being submitted as follow-up to the request for enforcement discretion (references 1). The license amendment should be effective upon issuance to be implemented immediately.

In accordance with 10CFR50.91(b), TU Electric is providing the State of Texas with a copy of this proposed amendment.

Should you have any questions, please contact Mr. Bob Dacko at (254) 897-0122.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Sincerely,

C. L. Terry

By: _____
James J. Kelley, Jr.
Vice President of
Nuclear Engineering and Support

BSD/bd
Attachments:
1. Affidavit
2. Description and Assessment
3. Affected Technical Specification page as revised by all approved license amendments

c - E. W. Merschoff, Region IV
J. I. Tapia, Region IV
T. J. Polich, NRR
Resident Inspectors CPSES

Mr. Arthur C. Tate
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704Attachment 1 to TXX-96007

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Texas Utilities Electric Company	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric	)	License Nos. NPF-87
Station, Units 1 & 2)	)	NPF-89

AFFIDAVIT

James J. Kelley, Jr., being duly sworn, hereby deposes and says that he is Vice President of Nuclear Engineering and Support for TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 98-002; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

James J. Kelley, Jr.
Vice President of
Nuclear Engineering and Support

STATE OF TEXAS)
)
COUNTY OF Somervell)

Subscribed and sworn to before me, on this 25 day of February.

Notary Public

JEAN AMUNDSON
NOTARY PUBLIC
STATE OF TEXAS
My Commission Expires 7-1-98

ATTACHMENT 2 to TXX-98050

DESCRIPTION AND ASSESSMENT

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I. BACKGROUND

While performing a review of surveillance procedures in accordance with U.S. NRC Generic Letter 96-01, it was determined that the surveillance procedures for Surveillance Requirements 4.8.1.1.2f.4)a) and 4.8.1.1.2f.6)a) were deficient in that the load shedding of one electrical bus on each unit had not previously been demonstrated. The surveillances required that upon a loss-of-offsite power, the emergency busses de-energize and load shedding occurs. The current procedures for the train B diesel generator (DG) for both CPSES Units 1 and 2 do not require confirmation that bus XEB4-3 load sheds for Units 1 and 2 respectively. This is a common bus that can be supplied from either Unit 1 or Unit 2.

TU Electric confirmed that failure to load shed this bus would not result in the diesel generators being inoperable as both diesels have sufficient reserve capacity to emergency start and perform their safety functions with these busses loaded at time zero in the diesel generator loading sequence. TU Electric believes that this specification only requires testing of the loads which are required to be load shed to allow the DG to perform its specified safety functions. Because the diesel generators remain capable of performing their specified safety functions without the load shed of this bus, TU Electric concluded that the surveillance had been met.

In subsequent discussions with NRR, the NRC staff expressed the opinion that, even though the staff did not see a safety problem or issue, CPSES was not in literal compliance with these Surveillance Requirements. Based on the feedback received from the NRC staff, TU Electric chose the conservative action of declaring the Surveillance Requirements as missed and invoking the requirements of Technical Specification 4.0.3 for a missed surveillance.

This change does not impact the improved Technical Specifications because it is temporary change and is plant specific.

II. DESCRIPTION OF TECHNICAL SPECIFICATIONS CHANGE REQUEST

This LAR will request a temporary Technical Specification change which removes the requirement to demonstrate the load shedding feature of MCC XEB4-3 as part of SRs 4.8.1.1.2f.4)a) and 4.8.1.1.2f.6)a) until plant startup subsequent to the next refueling outage for each respective unit or earlier outage of sufficient duration to properly schedule and perform the test.

III. ANALYSIS

The safety function of the A.C. Sources is to ensure that sufficient power will be available to supply the safety related equipment required for: (1)

the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The function of the Surveillance Requirement of concern is to demonstrate that for a start of the diesel generators, the emergency busses will de-energize and sufficient load will be shed, to allow the diesel generator to start, connect to the emergency busses and load. Because the busses in question can be loaded on the diesel generator at time zero of the loading sequence without affecting the ability of the diesel generator to properly start, connect to the emergency bus and load, the diesel generators' safety function is not adversely affected. Failure to test the load shed feature with respect to this single load has no impact on safety. TU Electric concludes that this change is safe and acceptable.

IV SIGNIFICANT HAZARDS CONSIDERATIONS ANALYSIS

TU Electric has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10CFR50.92(c) as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

   The only potential impact of operating without having demonstrated the load shedding feature of MCC XEB4-3 is the potential that the train B DG for either CPSES Unit 1 or Unit 2 will not be able to perform its safety function following a postulated accident or event. TU Electric has evaluated the potential load added to the DGs if this bus does not shed and has concluded that the DGs remain fully capable of performing their safety function. As a result, there is no significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

   Operation without having tested the load shedding feature of bus XEB4-3 does not effect the operation or design of the Units and therefore cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

   Because the diesel generators remain fully capable of performing their safety functions without having demonstrated the load shedding feature of MCC XEB4-3, there is no significant reduction in a margin of safety.

Based on the above evaluations, TU Electric concludes that the activities associated with the above described changes present no significant hazards consideration under the standards set forth in 10CFR50.92(c) and, accordingly, a finding by the NRC of no significant hazards consideration is justified.

V. ENVIRONMENTAL EVALUATION

TU Electric has determined that the proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10CFR20, or would change an inspection or surveillance requirement. TU Electric has evaluated the proposed changes and has determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), an environmental assessment of proposed change is not required.