

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

April 15, 1985
TXX-4457

Mr. D.R. Hunter, Chief
Reactor Project Branch 2
U.S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Docket Nos.: 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
UNDETECTABLE FAILURE IN SAFETY
FEATURES ACTUATION SYSTEM
QA FILE: CP-85-13, SDAR-173
FILE NO.: 10110

Dear Mr. Hunter:

In accordance with 10CFR50.55(e), we are submitting the enclosed report of actions taken to correct a deficiency regarding failures that exist in the safety features actuation system.

Supporting documentation is available at the CPSES site for your Inspector's review.

Very truly yours,

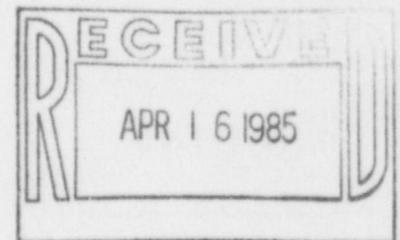
Billy R. Clements

BRC:tlg

Attachment

cc: NRC Region IV - (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)
U.S. Nuclear Regulatory Commission
Washington, DC 20555



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ATTACHMENT

UNDETECTABLE FAILURE IN SAFETY
FEATURES ACTUATION SYSTEM

Description

The NSSS supplier has advised TUGCo of an item involving the possibility for certain failures in engineered safety features actuation systems to remain undetected.

As a result of earlier concerns, specifically 10CFR50.55(e) report, SDAR CP-82-09, the supplier recommended corrective actions which were adopted by TUGCo. These measures consisted of special plant specific tests to make previously undetectable failures of the P-4 Permissive detectable.

The P-4 Permissive is provided by electrical contacts in the reactor trip breakers. When the breaker is open (reactor tripped), P-4 permits the operator to block actuation of the Safety Injection System and to enter the recirculation mode. The design did not provide for on-line testing of the P-4 contacts and failure of those contacts to perform properly was undetectable. The recommended tests resolved this by entering the switchgear cabinets and using a meter to measure the condition of the P-4 contacts.

The NRC and several utilities requested Westinghouse to give consideration to a hardware change to permit verification of P-4 without the need to enter the switchgear cabinets with portable test equipment. A change was developed and offered by Westinghouse as an option. This change consisted of mounting a meter and a multiposition switch on each cabinet door. It was accepted for use in fifteen plants (including CPSES) then in various stages of construction.

It has been recently determined, after evaluating an earlier identified concern as to the overall effectiveness of the change, that the possibility of undetectable failures remained under certain circumstances.

Safety Implications

In the event the deficiency had remained undetected, the potential exists for an undetectable loss of safeguards actuation devices.

Corrective Action

In accordance with Westinghouse recommendations, CPSES test procedures will be revised to incorporate the previously furnished CPSES specific testing requirements.