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**TEXAS UTILITIES GENERATING COMPANY**  
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April 23, 1985

JOHN W. BECK  
MANAGER-LICENSING

Director of Nuclear Reactor Regulation  
Attention: Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
TEMPORARY CHANGES TO PROCEDURES

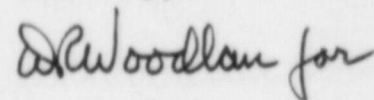
REF: B. J. Youngblood letter to  
M. D. Spence dated January 24, 1985

Dear Mr. Youngblood:

In response to the referenced letter, CPSES is revising the method by which temporary changes are made to plant procedures. In accordance with ANSI N18.7-1976, all temporary changes to procedures which do not change the intent of the approved procedures will be approved by two members of the station management staff, at least one of whom is SRO licensed.

This position is reflected in the attached revision to the affected CPSES Final Safety Analysis Report (FSAR) sections and will be included in the upcoming FSAR Amendment 55.

Sincerely,



John W. Beck

RWH/grr  
Attachment

c - S. B. Burwell  
A. L. Vietti

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## CPSES/FSAR

### Discussion

The CPSES design complies with the recommendations of Revision 3 (4/78) of this regulatory guide except as follows:

- a. The acceptable alternative methods of FSAR Subsection 6.1B.1.1.3 are used.
- b. The recommendations of Revision 1 (6/73) or Revision 2 (5/77) of this regulatory guide are used.
- c. The exception described in Subsection 6.1B.1.1.4.

Also refer to Appendix 1A(N).

### Regulatory Guide 1.32

Criteria for Safety-Related Electric Power Systems for Nuclear Power Plants

### Discussion

The CPSES design complies with the requirements of Revision 2 (2/77) of this regulatory guide. For details see Section 8.3.

### Regulatory Guide 1.33

Quality Assurance Program (Operation)

### Discussion

The quality assurance requirements for the operations phase of CPSES is in compliance with Revision 2 (2/78) of this regulatory guide.

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Q421.19

The quality assurance requirements of this regulatory guide will be implemented per the provisions of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants".

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Q421.19

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Also refer to Sections 17.1 and 17.2.

Regulatory Guide 1.34

Control of Electroslag Weld Properties

Discussion

Refer to Appendix 1A(N).

Regulatory Guide 1.35

Inservice Inspection of UngROUTED Tendons in prestressed Concrete Containment Structures

Discussion

This regulatory guide is not applicable to the CPSES which has a steel-lined, reinforced concrete containment structure.

Regulatory Guide 1.36

Nonmetallic Thermal Insulation for Austenitic Stainless Steel

Discussion

This regulator / guide is not applicable for components located inside CPSES Containment Buildings, since only stainless steel metal reflective thermal insulation is used for austenitic stainless steel



13.5 PLANT PROCEDURES AND INSTRUCTIONS

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The CPSSES staff is responsible for assuring the safe and efficient operation of the station, under the overall responsibility and direction of the Manager, Plant Operations. All activities which affect safety-related structures, systems and components will be conducted by detailed, written and approved procedures and instructions. Some activities may be controlled by the use of instructions. Instructions provide directions for detailed work activities within a particular department or section. This section identifies the activities that must be conducted by procedures and instructions and provides an appropriate method to develop and approve these procedures and instructions.

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13.5.1 ADMINISTRATIVE PROCEDURES

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The Manager, Plant Operations will develop and implement written administrative procedures that assign the responsibilities and authorities of the CPSSES staff and provide the control measures for the preparation, review, approval, revision and use of all station procedures and instructions which govern quality-related activities. Station procedures and instructions include plant operating procedures, test procedures, equipment control procedures, calibration procedures and instructions, maintenance or modification procedures and instructions, refueling procedures, procurement procedures, analysis procedures, material control procedures and special orders.

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Administrative procedures will ensure that station procedures and instructions are reviewed by qualified personnel, approved by authorized personnel and distributed to and used by the personnel performing the prescribed activity. Administrative procedures will be reviewed by the SORC and approved by the Manager, Plant Operations. The SORC review may be conducted and documented by individual members outside of formal meetings.

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13.5.1.1 Conformance with Regulatory Guide 1.33

27 | The administrative controls utilized during the operations phase, which are described in this section, will be consistent with the provisions of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, February 1978.

53 | 13.5.1.2 Preparation of Procedures and Instructions

53 | Preparation of plant operating procedures will take place in approximately the same time frame as the preparation of preoperational and initial startup test procedures. Administrative procedures which govern the assignment of responsibilities for preparation, review and approval of other station procedures and instructions will be prepared initially. Other administrative procedures will be prepared as necessary to implement the operational phase of programs such as security and visitor control, housekeeping, and document control and records management, etc. Operation department administrative procedures and operating procedures necessary for operator training and preparation for operator license examinations will be completed six months prior to fuel loading. All other procedures and instructions will be prepared and approved prior to their use for performing the prescribed safety-related activity.

53 | The station management position designated responsible for a given activity, as prescribed in the Administrative Control and Quality Assurance Plan, is also responsible for the preparation of procedures and instructions for that activity. The actual preparation of procedures and instructions may be performed by other TUGCO personnel or by outside contractors, but the final responsibility lies with the designated responsible position.

55 | The Manager, Plant Operations shall approve Station Administrative Procedures, Security Plan implementing procedures and Emergency Plan implementing procedures. All procedures shall be reviewed by qualified personnel and these reviews will be documented. Safety-related

procedures and instructions other than Station Administrative Procedures shall be reviewed by at least one individual other than the preparer and approved by an appropriate Supervisor. This designation of the appropriate supervisor shall be stated in writing by the SORC and approved by the Manager, Plant Operations.

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Temporary changes can be made to approved safety related procedures if they clearly do not change the intent of the procedure. Temporary changes must be approved by two members of the station management staff, at least one of whom is SRO licensed. The temporary changes shall be approved by the original approval authority within 14 days of implementation.

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Temporary changes to instructions shall be reviewed and approved in the same manner as a permanent revision to that instruction or as otherwise directed by SORC in writing.

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13.5.1.3 Procedures

The CPSSES Manager, Plant Operations will develop and implement station administrative procedures that provide a clear understanding of operating philosophy and management policies. As stated in 13.5.1.2, administrative procedures will be implemented that provide methods for the preparation, review and approval of all other station procedures including permanent procedures, temporary procedures or any procedures that might be of a transient or self-cancelling nature.

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Administrative procedures will be developed by the operations department that will provide operations shift supervisors and shift crews with a clear understanding of how they are to conduct plant operations.

Included will be procedures that specifically describe who may manipulate the controls of the reactor and who may operate any apparatus or mechanism that might affect the reactivity of the reactor.

Procedures also will be prepared that describe the responsibilities of the senior reactor operators who will direct the licensed activities of licensed operators and who will be present at the facility or on call.