

August 16, 1999

Mr. C. Lance Terry
TU Electric
Senior Vice President
& Principal Nuclear Officer
Attn: Regulatory Affairs Department
P. O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 -
INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS
(TAC NO. MA83608)

Dear Mr. Terry:

On July 8, 1999, the NRC staff issued the individual plant examination of external events for CPSES, which included a Safety Evaluation and a contractor's Technical Evaluation Report (TER). In the process of reproducing the July 8, 1999, letter and enclosures, page 13 of the contractor's TER was omitted. Enclosed is the subject page.

Sincerely,
ORIGINAL SIGNED BY

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure: Page 13 of the TER

cc w/encl: See next page

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Comanche Peak Steam Electric Station

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c. Review Findings

The Comanche Peak seismic IPEEE submittal provides a brief description of evaluations performed for outliers. Outliers were evaluated using the relevant seismic qualification documentation to insure that the observed critical or suspected details were adequately addressed. Other anomalies, such as potential seismic interaction issues, were also noted in the walkdowns, and similar actions were taken to evaluate their impact. Although only a few anomalies were identified, the submittal's description suggests that these outliers were appropriately evaluated against design-basis criteria, consistent with the guidelines of NUREG-1407.

2.1.9 Relay Chatter Evaluation

The Comanche Peak seismic IPEEE did not implement a relay chatter evaluation.

For a reduced-scope plant, a relay chatter evaluation is not requested in NUREG-1407, unless the plant also falls under the USI A-46 program. CPSES is not a USI A-46 plant. Hence, the lack of a relay chatter evaluation in the Comanche Peak seismic IPEEE is considered justified.

2.1.10 Soil Failure Analysis

The Comanche Peak seismic IPEEE does not implement an analysis of potential soil failures and their related impacts.

No analysis of potential soil failures is requested by NUREG-1407 as part of the seismic IPEEE for a reduced-scope plant. Furthermore, Comanche Peak is predominantly a rock site. Thus, the lack of a soils failure analysis in the Comanche Peak seismic IPEEE is considered justified.

2.1.11 Containment Performance Analysis

A containment safeguards equipment list was developed for the Comanche Peak seismic IPEEE. The list of selected components pertains to items needed to prevent early failure of containment functions. The seismic containment performance analysis involved a walkdown of containment-related systems, to identify any anchorage or potential spatial interaction problems. The treatment of containment safeguard systems was similar to that for SSEL items. Containment penetrations were evaluated in the IPE; no specific evaluation of penetrations for seismic failure modes was conducted in the IPEEE. The IPEEE submittal notes that the IPE also showed that containment fan coolers are not required for containment success, and hence, they were not credited (nor evaluated) in the seismic IPEEE. (Success of the containment cooling function was addressed only through evaluation of the containment spray system.)

The two containment safeguard systems that were evaluated in the seismic IPEEE include the containment spray system and the containment isolation system. Success criteria for these systems were determined from a review of system notebooks prepared for the IPE; then, the plant logic diagrams were consulted to identify the components required for containment success. The resulting containment systems equipment list was comprised of a significant number of components.

The containment performance assessment in the Comanche Peak seismic IPEEE is judged to be a meaningful examination of potential containment vulnerabilities.