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William J. Cahill, Jr.  
Executive Vice President

July 7, 1989

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  
MOTOR CONTROL CENTER SPACE HEATERS  
SDAR: CP-87-136 (SUPPLEMENTAL REPORT)

Gentlemen:

On January 11, 1988, TU Electric notified the NRC by final report logged TXX-88065 of an electrical separation deficiency involving the space heaters for Class 1E motor control centers (MCC's). The last letter submitted on this issue was TXX-89393, dated June 12, 1989. This supplemental report is submitted to partially revise the corrective action for this issue and update the completion schedule.

The identified deficiency involved unqualified space heaters for the Class 1E MCC's connected to Class 1E power sources in the MCC's. Additionally, Class 1E shunt trips for the non-Class 1E MCC's at the service water intake structure are connected as part of the space heater circuit. These conditions do not meet the isolation criteria described in the CPSES FSAR.

TXX-88065, dated January 11, 1988, described the following corrective actions to resolve these deficiencies:

- 1) The two fuses in each non-Class 1E space heater circuit for all Class 1E MCC's will be removed.
- 2) When the Class 1E MCC's are de-energized, temporary power will be connected to the space heater circuits.
- 3) The shunt trip circuits will be rewired to accommodate a direct power supply from the Class 1E source.

In lieu of corrective action items 1 and 2 described above for the MCC space heaters, the design will be changed to trip the space heater supply breakers on receipt of a Safety Injection Signal. This will properly isolate the Class 1E MCC's from the space heaters and meets the requirements of Regulatory Guide 1.75.

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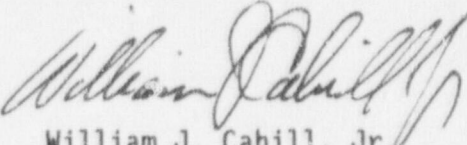
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The corrective action described in item 3 for the shunt trip circuits remains unchanged.

To preclude recurrence of this condition, the isolation criteria as described in the CPSES FSAR have been included in the applicable Design Basis Document (DBD). In lieu of performing the previously specified field verification method FVM-EE/ME/IC/CS-088, "PCHV Program for Engineering Reverification of Electric Separation", to confirm that adequate isolating devices exist where Class 1E to non-Class 1E isolation is required by Regulatory Guide 1.75, a review has been completed which validated the electrical one line drawings against the updated DBD.

Corrective action associated with this issue will be completed for Unit 1 prior to Unit 1 fuel load and for Unit 2 prior to Unit 2 fuel load.

Sincerely,



William J. Cahill, Jr.

WJH/vld

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