



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 69 TO

FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 69 TO

FACILITY OPERATING LICENSE NO. NPF-89

TXU ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated June 23, 1999, as supplemented by letter dated August 4, 1999, TXU Electric Company (TXU Electric, the licensee) requested changes to the Technical Specifications (TSs) for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The proposed changes would revise Surveillance Requirement (SR) 3.8.1.13, "AC Sources - Operating," to clarify that each emergency diesel generator (EDG) automatic noncritical trip except for engine overspeed and generator differential current, is bypassed on either a loss-of-offsite power (LOOP) or a safety injection actuation signal (SIAS).

The August 4, 1999, letter provided additional and clarifying information that did not change the scope of the original application and the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

The requirements in SR 3.8.1.13 currently require verification that each of the EDG's automatic trips, except engine overspeed and generator differential current trips, are bypassed on an actual or simulated loss of voltage signal on the emergency bus, concurrent with an actual or simulated SIAS. The licensee has proposed to revise this SR and its associated Bases to verify that each of the EDG's automatic trips, except for the engine overspeed trip and the generator differential current trip, are bypassed on an actual or simulated (1) loss of voltage signal on the emergency bus, or (2) an SIAS. At CPSES Units 1 and 2, EDG "emergency" starts are required for mitigation of design-basis accidents. An EDG start on SIAS is denoted as an "emergency" start, which means that several noncritical protective trip functions and interlocks are bypassed.

During a review of plant design documents, the licensee discovered that the EDG start on a LOOP condition is denoted as a "normal" start, which means that none of these noncritical

protective trip function and interlocks are bypassed. To resolve this condition, the EDG design modification associated with this change will be implemented on Unit 1 during the seventh refueling outage (1RFO7) to change the EDG start upon detection of a LOOP condition from a "normal" start to an "emergency" start. Similar modifications were performed on Unit 2 during 2RFO4; however, the Unit 2 modifications were made for a different reason than the underlying reason for this change request. The licensee states that the proposed change is conservative in that the surveillance previously required the trip bypass verification only for a LOOP in conjunction with an SIAS, whereas this revision requires the trip bypass verification both for the LOOP by itself and for the SI signal by itself.

Additionally, the licensee has proposed to add the following note to SR 3.8.1.13:

For Unit 2, testing need only be performed for LOOP concurrent with SI until startup following 2RFO5.

The purpose of this note is to clarify that CPSES Unit 2 need not perform revised surveillance as proposed, until startup following the next refueling outage (2RFO5). This note is proposed by the licensee to allow CPSES Unit 2 to continue to operate, giving credit for the most recent performance of SR 3.8.1.13, rather than shutting down the facility to perform the testing required by SR 3.8.1.13, as revised. The tests currently required by SR 3.8.1.13 were last performed by the licensee, for CPSES Unit 2, during 2RF04.

3.0 EVALUATION

The NRC staff has reviewed the licensee's proposed change to SR 3.8.1.13 and concludes that the proposed change to the EDG test is conservative in that the surveillance previously required the trip bypass verification only for a LOOP in conjunction with an SIAS, whereas this revision requires the trip bypass verification both for the LOOP by itself and for the SI signal by itself. On this basis, the staff finds the proposed change to the TS and the associated Bases to be acceptable. The NRC staff has also reviewed the proposed note to be added to SR 3.8.1.13 to allow CPSES Unit 2 to continue to operate, giving credit for the most recent performance of SR 3.8.1.13, rather than shutting down the facility to perform SR 3.8.1.13, as revised. The NRC concludes that, since the required design modifications have been performed at Unit 2, there is a high degree of confidence that the EDGs will perform as required and there is no need to shut down CPSES Unit 2 for performance of the testing required by revised SR 3.8.1.13. Accordingly, the NRC staff concludes that the proposed note is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments changes a surveillance requirement. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration,

and there has been no public comment on such finding (64 FR 38037 dated July 14, 1999). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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