

File Center



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

November 22, 1999

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2
RE: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-04,
"POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING
SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-
COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE
COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT"
(TAC NOS. MA4034 AND MA4035)

Dear Mr. Terry:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04 to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
 - (i) For plants with licensing basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design basis loss-of-coolant accident (DB LOCA), the following information shall be provided to demonstrate compliance:

NRC FILE CENTER COPY

PDRADOCK

DF01

- (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.
 - (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
 - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46b(5), "Long-term cooling" and the functional capability of the safety-related containment spray system as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:
- (a) If commercial-grade coatings are being used at your facility for Service Level 1 applications, and such coatings are not dedicated or controlled under your Appendix B Quality Assurance Program, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 11, 1998, for CPSES, Units 1 and 2. This submittal provided the information requested by GL 98-04. The NRC staff has reviewed your response and has concluded that all the requested information has been provided; therefore, we consider GL 98-04 to be closed for CPSES, Units 1 and 2. We thank you for your prompt and complete response.

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

cc: See next page

DISTRIBUTION:

File Center
 PUBLIC
 PD#IV-1Reading
 OGC

ACRS
 JTapia, RIV
 RPulsifer
 CLauron
 JDavis

To receive a copy of this document, indicate "C" in the box					
OFFICE	PDIV-1/PM	PDIV-1/LA	C	PDIV-1/SC	C
NAME	D. Jaffe	D. Johnson		R. Gramm	
DATE	11/18/99	11/10/99		11/22/99	

~~PD-3/PM~~
~~R. Pulsifer~~
 11/1/99

EMCB/sc
 E. Sullivan
 11/19/99

19
 11/18/99
 11/19/99

Comanche Peak Steam Electric Station

cc:

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 2159
Glen Rose, TX 76403-2159

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Mrs. Juanita Ellis, President
Citizens Association for Sound Energy
1426 South Polk
Dallas, TX 75224

Mr. Roger D. Walker
Regulatory Affairs Manager
TXU Electric
P. O. Box 1002
Glen Rose, TX 76043

George L. Edgar, Esq.
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

Honorable Dale McPherson
County Judge
P. O. Box 851
Glen Rose, TX 76043

Office of the Governor
ATTN: John Howard, Director
Environmental and Natural
Resources Policy
P. O. Box 12428
Austin, TX 78711

Arthur C. Tate, Director
Division of Compliance & Inspection
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Jim Calloway
Public Utility Commission of Texas
Electric Industry Analysis
P. O. Box 13326
Austin, TX 78711-3326