

TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER DALLAS, TEXAS 75201-3050

Log # TXX-4038
File # 10035

September 1, 1983

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
SUPPLEMENTAL RESPONSE TO NRC GENERIC LTR. 83-10c
TMI ACTION PLAN II.K.3.5
AUTOMATIC TRIP OF REACTOR COOLANT PUMPS

REF: TXX-3654 dated April 11, 1983

Dear Mr. Youngblood:

As noted in the referenced Texas Utilities' response to NRC Generic Letter 83-10c, CPSES containment isolation is based upon the Phase A/Phase B isolation signal concept (see FSAR Sections 6.2.4 and 7.3.1.1.4, item 2). An evaluation of the containment isolation signal for each fluid system was conducted in response to TMI action plan item II.E.4.2. At CPSES, the Component Cooling Water (CCW) supply to the reactor coolant pumps (RCP) is interrupted by a Phase B containment isolation signal. The reactor coolant pump seal injection flow is not terminated by an automatic containment isolation signal. Review of the II.E.4.2 evaluation does not indicate that a change in the containment isolation signal for either system is warranted. There are two reasons for this position. First, the CPSES Emergency Frequency Response Guidelines (ERGs) note that interruption of the CCW supply to the RCPs, in conjunction with an increase in either the upper or lower RC motor bearing temperature to 200°F, require that the RCPs be tripped. The possibility of this action is included in the bases of the Westinghouse Owner's Group generic ERGs upon which the CPSES ERGs are based. The Westinghouse Owner's Group ERGs explicitly warn of the criteria that require an RCP trip. This warning has been incorporated into all of the CPSES Emergency Operating Procedures (EOPs). The second consideration is that at CPSES only two accident conditions-LOCA and secondary system break-are expected to be precursors of a Phase B containment isolation actuation. The responses to both of these conditions are covered by CPSES EOPs that clearly state the RCP trip criteria.

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An RCP trip can result due to the loss of CCW because of a Phase B containment isolation signal. This RCP trip is an operator initiated action as required by CPSES procedures that clearly state the RCP trip criteria. If, after the generation of a Phase B containment isolation signal, continued use of the RCPs is desired, then the CCW supply must be restored. The restoration of the CCW pathways will require correcting the containment high pressure condition and resetting the appropriate trip signal. Once these actions have been accomplished, the CCW system valves can be realigned to provide the desired flowpath. The RCPs can then be restarted according to CPSES procedures.

In conclusion, there is an emphasis in the CPSES ERGs and operator training program on the criteria that require the RCP's to be tripped. CPSES is committed to mitigating damage to the RCPs by operator trip of the RCPs when conditions warrant it. Therefore, no damage is expected to occur to the RCPs due to a containment isolation signal. The RCPs can be restarted once the high containment Phase B condition has been corrected. We believe that this position satisfies the concerns and criteria of NRC Generic Letter 83-10c, Section 1(e) of the enclosure.

Sincerely,


H. C. Schmidt

BSD:tls
Enclosure

cc: S. B. Burwell