

TU ELECTRIC

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W. J. Cahill  
Executive Vice President

March 6, 1991

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  
ADVANCE FSAR SUBMITTAL REGARDING THE REMOVAL OF MILD ENVIRONMENT  
FROM THE CPSES ENVIRONMENTAL QUALIFICATION (EQ) PROGRAM

On July 16, 1990, a conference call was held between NRC Region IV and TU Electric to discuss resolution of NRC concerns regarding vendor recommendations for electrical equipment located in mild environment areas (electrical mild equipment) and mechanical equipment located in potentially harsh environment areas (mechanical harsh equipment). Specifically, vendor recommended maintenance activities identified in electrical mild and mechanical harsh equipment EQ packages were not included in the Equipment Qualification Maintenance Manual (EQMM). TU Electric committed to the following for the above equipment.

1. EQ program personnel would review all vendor recommendations with respect to EQ related equipment.
2. During the review, all vendor recommendations would be evaluated to identify the important attributes for preserving the qualified status of equipment, with respect to EQ.
3. Vendor recommendations (or an EQ-approved alternative method of achieving the above important attributes) would be implemented in the CPSES preventive maintenance program via the EQMM.
4. The above activities would be completed prior to the end of the first refueling outage at CPSES, Unit 1.

TU Electric added that we may elect to change these programs in the future and if so, would notify the NRC.

The EQ program for mechanical harsh equipment is not being revised. However, TU Electric has reevaluated and determined that the current program to qualify electrical mild equipment is overly conservative and need not be maintained in a manner similar to the CPSES harsh EQ program for electrical equipment located in a potentially harsh environment (i.e. per 10CFR50.49).

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This letter provides an advance copy of changes to be included in a future FSAR amendment which will remove electrical mild equipment from the CPSES EQ program. In the future, procurement documents will specify the most stringent requirements of the electrical mild equipments' end use. The CPSES maintenance and surveillance programs, in conjunction with a trending program will ensure that electrical mild equipment is maintained throughout the equipments' installed life. This methodology for procuring and maintaining mild equipment is consistent with the guidance provided in Section 3.11 of the Standard Review Plan (NUREG-0800).

As a result, EQ packages for electrical mild equipment will no longer be maintained and vendor recommendations currently in these packages will be taken into consideration as part of the maintenance program.

To facilitate NRC staff review of these changes, the attachments are organized as follows:

1. Draft revised FSAR pages, with changed portions indicated by a bar in the margin as they are to appear in a future amendment (additional pages immediately preceding and/or following the revised pages are provided if needed to understand the change).
2. A description/justification of each revised item.
3. A copy of related SER/SSER sections.
4. The bold/overstrike version of the revised FSAR pages referenced by the description/justification for each item identified above. The bold/overstrike version facilitates review of the revisions by highlighting each addition of new text in bold type font and overstriking with a slash (/) the portion of the text that is deleted.

The revised mild environment program will be applied to both Unit 1 and Unit 2 as soon as the appropriate implementing procedures and commitments have been revised and satisfied, respectively.

It is unclear whether these changes in the EQ Program constitute a change in the validation provisions for CPSES Unit 2, as described in the Joint Stipulation. To satisfy any obligations that TU Electric may have under Paragraphs A.2 and A.3 of the Joint Stipulation, a copy of this letter and its attachments are being provided to CASE.

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If you have any questions regarding this submittal, please contact  
Veronica Cornell at (214) 812-8886.

Sincerely,



William J. Cahill, Jr.

VPC/gj  
Attachments

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