

Log # TXX-90155
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914.2
Ref. # 10CFR50.34

April 20, 1990

William J. Cahill, Jr.
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
INITIAL STARTUP TEST PROGRAM

Ref: TU Electric letter TXX-89757 dated October 12, 1989 from
William J. Cahill, Jr. to U.S.N.R.C.

Gentlemen:

In the referenced letter, TU Electric made the commitment that any changes to the initial Startup Test Program described in Chapter 14 of the FSAR would be reported in accordance with 10CFR50.59(b) within one month of the approval of the change. The purpose of this letter is to report a change made to procedure ISU-022A, "Reactor Coolant System Leakage Rate Test."

The "Reactor Coolant Leak Test Summary" FSAR Table 14.2-3, Sheet 29, contains the following prerequisite:

The reactor is shut down with all RCCA's (Rod Control Cluster Assemblies) inserted prior to initial criticality.

Procedure ISU-022A, "Reactor Coolant System Leakage Rate Test," has been revised to delete the prerequisite for all RCCA's to be inserted. The requirement for the reactor to be shutdown and the requirement for testing prior to initial criticality have been retained in the procedure.

The safety evaluation considered the potential effect of this change on the Reactor, the Reactor Coolant System, and the Leak Rate Test and test results. This change will not impair the ability of equipment to perform its required safety function nor will it increase the probability of the occurrence or consequences of an accident or equipment malfunction.

Further, this evaluation has determined that this change has not introduced the possibility of different failure modes since the position of the RCCA's is fully assessed in the Licensing Basis Documents. Finally, the margin of safety is unchanged because the position of the RCCA's was controlled by other initial startup procedures and because the deletion of the RCCA's positioning in ISU-022A has no effect on RCS leakage measurements or limits.

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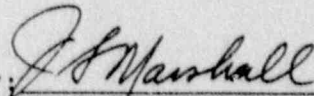
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Therefore, it has been concluded based on this safety evaluation that this change does not involve an unreviewed safety question and is therefore acceptable under the provisions of 10CFR50.59. This documentation is available onsite for your review. A revision to FSAR Table 14.2-3, Sheet 29, to reflect the deletion of the test prerequisite will be provided in a future amendment.

Sincerely,

William J. Cahill, Jr.

By: 
J. S. Marshall
Generic Licensing Manager

RSB/vld

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