TU ELECTRIC

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William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
DEFERRED PRE-OPERATIONAL TEST AND RETEST STATUS AND
SAFETY PARAMETER DISPLAY SYSTEM (SPDS) AVAILABILITY TEST

REF: 1) TU Electric letter logged TXX-89709 from William J. Cahill, Jr. to the NRC dated September 14, 1989
2) TU Electric letter logged TXX-93011 from William J. Cahill, Jr. to the NRC dated January 8, 1993
3) TU Electric letter logged TXX-93051 from William J. Cahill, Jr. to the NRC dated January 25, 1993

Gentlemen:

TU Electric hereby provides supplemental information regarding several deferred pre-operational test items which were discussed in References 2 and 3. Additionally, clarification is provided regarding the SPDS 30 day availability test as described in Reference 1.

Sincerely,

William J. Cahill, Jr.

William J. Cahill, Jr.

By: Roger D. Walker

Roger D. Walker
Manager of Regulatory
Affairs

JHG:bm
Attachment

cc: Mr. J. L. Milhoan, Region IV
Mr. L. A. Yandel, Region IV
Mr. B. E. Holian, NRR
Resident Inspectors, CPSES (2)

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A. Deferred Test Items

1. Communication System

"Demonstrate that the Public Address and Emergency Evacuation Alarm System are audible during the highest expected ambient noise levels."

The Public Address and Emergency Evacuation Alarm System will be audible above ambient for all areas of the plant prior to entry into Mode 2 or compensatory actions will be in place for deficient areas. The audibility will be reverified in select areas of the Turbine Building during power ascension in the event ambient noise levels increase due to the change in plant conditions.

2. Steam Dump Valves

"Demonstrate the proper operation of the steam dump valves."

Steam dump valve stroke time testing will be completed prior to entry into Mode 2. However, it should be noted that the stroke time test method has been revised as compared to the pre-operational test method. The pre-operational test required steam flow through the valve during timing. Utilizing that method while in Mode 3 imposes a risk of causing a rate sensitive steam pressure ESF actuation. The method presently being used to test these valves is the same as that used for Unit 1. The valves are stroke tested hot but with the downstream block valves closed.

3. Plant Computer Data Archive

"TU Electric intends to install and test the increased memory prior to entry into Mode 2 to minimize the download requirements prior to power ascension testing."

Increased memory has been installed and tested. Download requirements have been reduced from once every one or two days to once every four to five days. TU Electric's position is that this satisfies our test commitment for this item. However, it should be noted that work is in progress to further reduce download requirements through additional increases in available memory. This additional enhancement will be controlled and tested per the appropriate normal plant modification procedures.

4. Plant Computer Reactor Protection System Monitor Module

"The module is expected to be operational and tested prior to entry into Mode 1."

This module emulates the logic in the SSPS and provides no safety-related function. This was an enhancement added to the Unit 2 plant computer which is not functional on Unit 1. The objective was to provide an added means of assessing SSPS status and to enhance the capability to perform post event assessments.

The feature has not met TU Electric's expectations and is being deleted from the plant computer design. This testing commitment is no longer applicable.

B. Deferred Retest

1. Pressurizer Spray Valve Leakage

"Demonstrate Leak Rate of Pressurizer Spray Valve."

Retesting of the pressurizer spray valve is complete. The valve leakage is still higher than expected. An engineering evaluation has been made and the conclusion is the leakage is acceptable for continued operation because there is no adverse impact to operation of the plant or to plant safety. The item is being tracked as a maintenance item to be worked during an outage.

C. Clarification Regarding SPDS Availability Test

TXX-89709 indicated that a 30 day test would be performed within 60 days after fuel load, and 60 days thereafter, the test results would be submitted to the NR . The intention was to mean the test would be started within 60 days of completing fuel load, and upon successful completion of the test, the test results would be submitted to the NRC within 60 days. This interpretation is the same as used for Unit 1.