

TEXAS UTILITIES SERVICES INC.

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Log # TXX-3519

File # 10010

May 13, 1982

Mr. Spottswood Burwell
U. S. Nuclear Regulatory Commission
Licensing Project Manager
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

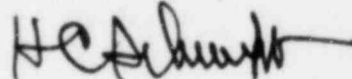
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
STEAM GENERATOR LEVEL CONTROL
NRC QUESTION 032.109

Dear Mr. Burwell:

The response to question 032.109 shall be revised in the next amendment to the CPSES FSAR. In order to permit early review by the NRC Staff and closure of this issue, an advance copy of this revised response is attached.

If you have any questions, please call.

Sincerely,



H. C. Schmidt

DRW:tls

Attachment

cc: ARMS

R. D. Calder
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Q032.109 Steam Generator Level Control

The protection system for Comanche Peak initiates isolation of the feedwater system based on 2 out of 3 high steam generator level. Since one of the three steam generator level signals may be used for level control, the failure of this level measurement channel would result in steam generator overfill by action of the level control system. As a consequence of such a failure, both channels of the protection system must operate to provide the required protective action (i.e. 2 out of 2 high level trip). We believe that this scenario leads to a condition which is in direct violation of Section 4.7.3 of IEEE-279, and 10 CFR Part 50.55 a(h). Therefore, we request that you provide the basis that this design is acceptable or that you propose a system modification (e.g. initiate high level trip based on 2/4) which otherwise resolves this concern.

R032.109 The protection system for Comanche Peak initiates the isolation of the feedwater system based on 2 out of 3 HI-HI steam generator level. The level control system for the steam generator uses one of these steam generator level signals or a fourth steam generator level signal which is not used in the HI-HI steam generator logic.

It is the intention of Comanche Peak to normally use this fourth level signal for steam generator level control. When this fourth level signal is used, the failure of a single level signal will not cause both a steam generator overfill and a consequential reduction in the HI-HI steam generator level logic to 2 out of 2. Thus, when the fourth level signal is used, the design is not in violation of Section 4.7.3 of IEEE-279 or 10 CFR 50.55 a(h).

The fourth level signal shall always be used at CPSES except when the signal is not operable or for testing. When the other level signal which is available for steam generator level control is selected and steam generator control is in automatic, the HI-HI steam generator isolation signal for the channel selected for steam generator level control will be placed in the tripped condition within 1 hour and shall remain in the tripped condition whenever steam generator level control is in automatic until the fourth level signal is operable and selected for control. This shall ensure that the requirements of Section 4.7.3 of IEEE-279 and 10 CFR Part 50.55a(h) are adequately met.