

TEXAS UTILITIES GENERATING COMPANY

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Log # TXX-3656
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R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

April 15, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch 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
RESPONSE TO NRC GENERIC LETTER 82-33

Dear Mr. Youngblood:

In response to NRC Generic Letter 82-33 and its attachment, Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability", Texas Utilities Generating Company provides the information below.

SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

The SPDS for Comanche Peak Steam Electric Station (CPSES) is described in the CPSES Final Safety Analysis Report (FSAR), Section III.A.1.2.

The SPDS is being promptly implemented and final implementation is scheduled to occur by fuel load. Development of the SPDS is being adequately integrated with the control room design review and the development of symptom-oriented emergency operating procedures, which are both essentially complete.

Safety analyses describing the basis for why the selected parameters are sufficient have been completed and will be available prior to fuel load.

DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

The DCRDR of CPSES in accordance with NUREG-0700 is nearly complete. The review team and the review program were established, the emergency operating procedures (based on the Westinghouse Owners Group function and task analysis) were prepared and compared to the CPSES Control Room, and the survey (with the exception of the sound, lighting and HVAC surveys) have been completed. The human engineering discrepancies (HED's) have been assessed to determine which should be corrected and summary justifications developed for those that will not be corrected. The changes that will be made have been verified as to their

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acceptability and are being coordinated with the other emergency response activities. This DCRDR effort has been documented in the summary report submitted by TXX-3588 on December 15, 1982, as supplemented by TXX-3637 of March 1, 1983.

An extensive review of the DCRDR effort at CPSES was conducted by the NRC staff from April 4, 1983, through April 8, 1983. The results of this review will be addressed in a supplement to the DCRDR summary report which is scheduled to be issued in July, 1983.

If conditions allow, the sound, lighting and HVAC surveys will be completed prior to fuel load. If conditions do not allow the final surveys to be completed prior to fuel load, preliminary surveys will be completed and reported prior to fuel load and the final surveys will be completed and reported before exceeding 5% power. The schedule for implementing changes to correct the HED's from these surveys will be negotiated with the staff when they are reported.

All changes that have been selected to correct the HED's that have thus far been identified by the DCRDR are scheduled to be completed prior to fuel load. If circumstances prevent completion of any of these changes prior to fuel load, the changes that cannot be completed will be identified to the staff approximately sixty (60) days before fuel load as will a proposed implementation schedule.

REGULATORY GUIDE 1.97 - APPLICATION TO EMERGENCY RESPONSE FACILITIES

A plant specific analysis of the information system requirements for CPSES was conducted. This analysis was based on the design basis accident event scenarios and required operator actions, using the guidance provided in U.S. NRC Regulatory Guide 1.97, Revision 2. As a result, specific variables were selected and specific design and qualification criteria developed to assure the safety of CPSES. These variables and criteria are described in detail in the CPSES FSAR, Section 7.5 and meet the intent of Regulatory Guide 1.97, Revision 2. Additional justification for specific deviations from the appropriate table in Regulatory Guide 1.97, Revision 2 will be provided as necessary.

All accident monitoring instrumentation as described in CPSES FSAR Section 7.5 will be installed by fuel load except for steam generator safety valve position indication, which will be installed by the end of the first refueling outage, and reactor vessel level indication, which will be installed by the end of the third refueling outage.

UPGRADE EMERGENCY OPERATING PROCEDURES (EOP's)

Generic Technical Guidelines were submitted to the NRC by the Westinghouse Owners Group. A Procedures Generation Package following the guidance of NUREG-0899, was submitted to the NRC on January 12, 1983. EOP's have been developed for CPSES based on this package and are available for NRC audit.


The basic requirements for CPSES are complete with respect to this item.

EMERGENCY RESPONSE FACILITIES (ERF's)

A description of the CPSES ERF's is provided in the CPSES FSAR, Section III.A.1.2. Discussion of the alternate Emergency Operating Facilities is provided in the CPSES SER Supplement 3 (NUREG-0797).

Emergency Response Facilities are in the process of being established at CPSES and final implementation is scheduled to occur by fuel load.

Sincerely,


R. J. Gary