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10010  
Ref. # 10CFR50.90  
10CFR50.36

C. Lance Terry  
Group Vice President

November 18, 1994

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
SUBMITTAL OF LICENSE AMENDMENT REQUEST 94-019  
REMOVAL OF ACCELERATED TESTING AND SPECIAL REPORTING  
REQUIREMENTS FOR EMERGENCY DIESEL GENERATORS

Gentlemen:

Pursuant to 10CFR50.90, TU Electric hereby requests an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating the attached changes into the CPSES Units 1 and 2 Technical Specifications. These changes delete accelerated testing and special reporting requirements for CPSES Units 1 and 2 Emergency Diesel Generators.

Technical Specification Surveillance Requirements 4.8.1.1.2a and 4.8.1.2 are revised to "At least once per 31 days...." and the accelerated testing schedule, Table 4.8-1, is deleted. Also deleted are the special reporting requirements in Surveillance Requirement 4.8.1.1.3. The associated BASES Section is revised to add Generic Letter 94-01 as a reference and delete the paragraph discussing the diesel generator test schedule in Table 4.8-1. These changes are based on Generic Letter 94-01, May 31, 1994.

Attachment 1 is a required affidavit. Attachment 2 provides a detailed description of the proposed changes, a safety analysis of the proposed changes and TU Electric's determination that the proposed changes do not involve a significant hazard consideration. Attachment 3 provides the affected technical specification pages (NUREG-1468) marked-up to reflect the proposed changes. Also enclosed is a copy of Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators", May 31, 1994.

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400 N. Olive L.B. 81 Dallas, Texas 75201

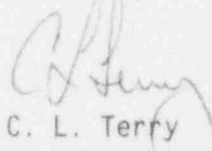
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TU Electric is scheduled to implement the maintenance rule for Emergency Diesel Generators on June 1, 1995. Generic Letter 94-01 requires that the maintenance rule be implemented within 90 days of the issuance of license amendment. TU Electric would also like at least 90 days for implementation of the technical specification change after NRC approval. Therefore, TU Electric requests that the License Amendment be approved on or before March 3, 1995, to be implemented by June 1, 1995.

In accordance with 10CFR50.91(b), TU Electric is providing the State of Texas with a copy of this proposed statement.

Should you have any questions, please contact Mr. Manu C. Patel at (214) 812-8298.

Sincerely,



C. L. Terry

MCP/grp

- Attachments:
1. Affidavit
  2. Description and Assessment
  3. Affected Technical Specification pages (NUREG-1468) as revised by all approved license amendments
- Enclosures:
1. Generic Letter 94-01, dated May 31, 1994
  2. Applicable pages of Safety Evaluations, Inspection Requirements for TDI Diesel Generators (TAC No. M85325), March 17, 1994.

c - Mr. L. J. Callan, Region IV  
Mr. T. J. Polich, NRR  
Mr. D. D. Chamberlain, Region IV  
Resident Inspectors, CPSES (2)

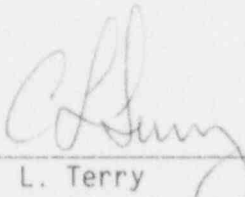
Mr. D. K. Lacker  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49th Street  
Austin, Texas 78704

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Texas Utilities Electric Company	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric	)	
Station, Units 1 & 2)	)	

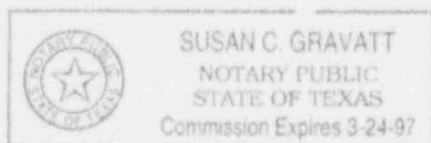
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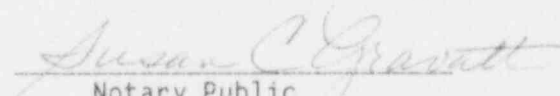
C. L. Terry being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 04-019; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
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C. L. Terry  
Group Vice President,  
Nuclear Production

STATE OF TEXAS     )  
                              )  
COUNTY OF *Somervell*)

Subscribed and sworn to before me, a Notary Public, on this 18th day of November, 1994.



  
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Notary Public

ATTACHMENT 2 TO TXX-94310

DESCRIPTION AND ASSESSMENT

## DESCRIPTION AND ASSESSMENT

### I. BACKGROUND

The Comanche Peak Steam Electric Station (CPSES) design employs Emergency Diesel Generators (EDGs) to provide on site AC power in the event that off site AC power is not available. The EDGs are required to be tested on a periodic basis (normally monthly) to provide an ongoing demonstration of performance and reliability. In accordance with Technical Specifications, EDG failures are reported to the Nuclear Regulatory Commission (NRC) in special reports, and when certain values for the number of failures per number of valid tests (as defined by Regulatory Position C.2.e of Regulatory Guide 1.108, Revision 1) are exceeded, the frequency of testing is accelerated to weekly.

The NRC Generic Safety Evaluation Report for TDI Diesel Generators, dated March 17, 1994, included as part of Generic Topical Report TDI-EDG-001-A (Reference 1), concluded that deletion of accelerated testing along with the addition of slow starting the EDGs decreases the wear and tear of the engines and increases the reliability and availability by reducing the outage time during refueling. The data from engines in nuclear service which have implemented the slow-start option support these conclusions. The technical specification change covering the slow start of the EDGs was submitted to the NRC by LAR 94-010 (TXX-94118, dated April 25, 1994).

While the special reporting and accelerated testing program prescribed by Technical Specifications addresses EDG performance and reliability, implementation of the provisions of the maintenance rule for EDGs, including the applicable regulatory guidance, is an alternative program that provides desired flexibility, while maintaining necessary assurance of EDG reliability and availability. In Generic Letter 94-01 (Reference 2) the NRC concludes that such a program is an acceptable alternative. Change to the special reporting and accelerated testing program were not included in the improved Standard Technical Specifications, NUREG-1431 (Reference 3), which was issued prior to Generic Letter 94-01.

### II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

Technical Specification Table 4.8-1, denoting accelerated testing criteria, is to be deleted. Surveillance Requirement (SR) 4.8.1.1.2a referring to Table 4.8-1 for testing frequency is to be modified to read, "Each diesel generator shall be demonstrated OPERABLE: At least once per 31 days on a STAGGERED TEST BASIS ...." Surveillance Requirement 4.8.1.1.3 regarding special reporting of test failures is to be deleted. Surveillance Requirement 4.8.1.2 applying SR 4.8.1.1.3 in Modes 5 and 6 is to be modified to delete the reference to SR 4.8.1.1.3. Bases Section 3/4.8.1

Paragraph 6 is to be supplemented to add Generic Letter 94-01 as another basis of the SRs for demonstrating operability of the EDGs, and Paragraph 7, which references the Diesel Generator test schedule as per Table 4.8-1, is deleted. These changes delete accelerated testing and special reporting requirements in response to EDG failures from the Technical Specifications.

### III. ANALYSIS

The functional requirement for the EDGs is to provide electric power for safe shutdown of the plant during loss of offsite power. To provide an ongoing demonstration of the reliability of the EDGs to fulfill this requirement, the EDGs are required to be tested on a periodic basis (normally monthly). In accordance with existing Technical Specifications, EDG failures are reported to the NRC in special reports, and when certain values for the number of failures per number of valid tests (as defined by Regulatory Position C.2.e of Regulatory Guide 1.108, Revision 1) are exceeded, the frequency of testing is accelerated to weekly.

Special reporting of each EDG failure requires the expenditure of resources but adds negligible value to the evaluation and resolution of failures conducted as required by an existing internal corrective action program. Deletion of the currently prescribed special reporting would allow better utilization of existing resources. Circumstances of EDG failures that meet the criteria of 10CFR50.72 and 10CFR50.73 would continue to be reported under the provisions of those regulations. Additionally, information on failures would continue to be maintained as plant records, which are available for NRC review.

Increased EDG testing does not necessarily equate to improved reliability. Each EDG start and operational cycle subjects the EDG components to stress and wear. This, in turn, requires additional maintenance with out-of-service time. Furthermore, each test start conducted when the EDG can be removed from service includes approximately two hours of unavailability while pre and post run checks are made to ensure that cylinder jacketwater has not entered an engine cylinder. Therefore, deletion of prescribed accelerated testing is expected to increase reliability by reducing engine wear and to increase availability by reducing the time required for maintenance and the unavailability time associated with most test starts.

Within 90 days of the issuance of the requested license amendment, and prior to implementation, TU Electric will implement a program for monitoring and maintaining EDG performance in accordance with the provisions of the Maintenance Rule (10CFR50.65) and consistent with the guidance of Regulatory Guide 1.160 (Reference 4). Per Generic Letter 94-01, this commitment by TU Electric provides an acceptable basis for the staff to approve this requested license amendment.



In summary, deletion of special reporting and accelerated testing in response to EDG failures from the Technical Specifications is expected to improve EDG reliability and availability and to allow better utilization of resources. Furthermore, TU Electric's commitment regarding implementation of the provisions of the maintenance rule for EDGs, including the applicable regulatory guidance, is an acceptable alternative program that provides desired flexibility in addressing EDG performance and reliability.

#### VI. SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TU Electric has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10CFR50.92(c) as discussed below:

Do the proposed changes:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated?

Deletion of the requirement for special reporting of EDG failures has no relation to probability or consequences of accidents. Therefore, deletion of the requirement for special reporting of EDG failures does not involve a significant increase in the probability or consequences of an accident previously evaluated.

There are no initiating events in accidents previously evaluated that involve testing of EDGs. Therefore, deletion of accelerated testing of EDGs does not involve a significant increase in the probability of an accident previously evaluated.

A reduction in the number of test starts decreases EDG component stress and wear and decreases unavailability time for maintenance and pre and post run checks. The resulting change in EDG reliability and availability is an improvement toward ensuring the EDGs are capable of fulfilling their functional requirement to provide electric power for safe shutdown of the plant during loss of offsite power. Furthermore, implementation of the maintenance rule provisions for performance monitoring and root cause analysis for failures as a basis for establishing corrective actions establish an alternate reliability basis that is at least equivalent to that established by accelerated testing. Therefore, deletion of accelerated testing of EDGs does not involve a significant increase in the consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated?

Deletion of the requirement for special reporting of EDG failures introduces no new failure modes for the EDGs or other plant systems and therefore has no relation to creation of accidents. Therefore, deletion of the requirement for special reporting of EDG failures does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The frequency at which EDG testing occurs does not affect the potential failure modes of the EDGs, which have already been assessed in the CPSES design. Therefore, deletion of accelerated testing of EDGs does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Involve a significant reduction in a margin of safety?

Acceptance limits and failure values are not affected by the requirement for special reporting of EDG failures. Therefore, deletion of the requirement for special reporting of EDG failures does not involve a significant reduction in a margin of safety.

The margin of safety impact associated with accelerated testing relates to EDG reliability and availability. A reduction in the number of test starts decreases EDG component stress and wear and decreases unavailability time for maintenance and pre and post run checks. The resulting change in EDG reliability and availability is an improvement toward ensuring the EDGs are capable of fulfilling their functional requirement to provide electric power for safe shutdown of the plant during loss of offsite power. Furthermore, implementation of the maintenance rule provisions for performance monitoring and root cause analysis for failures as a basis for establishing corrective actions establish an alternate reliability basis that is at least equivalent to that established by accelerated testing. Therefore, deletion of accelerated testing of EDGs does not involve a significant reduction in a margin of safety.

Based on the above evaluations and the fact that these changes are consistent with Generic Letter 94-01 as issued by the NRC, TU Electric concludes that the activities associated with the proposed changes satisfy the no significant hazards consideration standards of 10CFR50.92(c) and accordingly, a no significant hazards consideration finding is justified.



## V. ENVIRONMENTAL EVALUATION

TU Electric has evaluated the proposed changes and has determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released off site, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), an environmental assessment of the proposed changes is not required.

## VI. REFERENCES

1. Generic Topical Report TDI-EDG-001-A, "Basis for Modification to Inspection Requirements for Transamerica Delaval, Inc., Emergency Diesel Generators", April 28, 1994.
2. Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators", May 31, 1994.
3. NUREG-1431, "Standard Technical Specifications Westinghouse Plants", Rev. 0, September 28, 1992.
4. Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants", Rev. 0, June, 1993.