

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER * 400 NORTH OLIVE STREET, L.B. 81 * DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT

February 7, 1984

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
ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED
MECHANICAL EQUIPMENT IN POTENTIALLY HARSH
ENVIRONMENTS

- REF: (1) Noonan to Youngblood letter of December 14, 1982, entitled
"Comanche Peak - Equipment Environmental Qualification"
(2) TXX-3652 Schmidt to Director NRR letter of March 30, 1983,
entitled "Environmental Qualification Mechanical Equipment"
(3) Youngblood to Gary letter of December 16, 1983, entitled
"Environmental Qualification of Safety-Related Mechanical
Equipment for Comanche Peak"

Dear Sir:

By letter of December 14, 1982, reference (1), the NRC Staff documented agreements reached with Texas Utilities regarding the information that must be provided for Staff acceptance of the environmental qualification of safety related mechanical equipment at Comanche Peak (CPSES). On March 30, 1983, reference (2), Texas Utilities provided this information and, subsequently, responded to all Staff inquiries concerning the submittal. After review of its submittal, the Staff informed Texas Utilities that the submittal was acceptable and the issue was closed. Now, by letter of December 16, 1983, reference (3), the Staff is attempting to reopen the issue and ratchet Texas Utilities into a substantial backfit, i.e., performing a major study of all safety related mechanical equipment located in areas of "potentially" harsh environments. Texas Utilities submits that this backfit is unwarranted and technically unjustified, and requests a meeting with Staff management to discuss and resolve this issue.

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In the fall of 1982, the NRC Staff and cognizant personnel from Texas Utilities met on several occasions to review the environmental qualification of safety related mechanical equipment at CPSES. Texas Utilities maintained that design, specification, procurement and quality assurance procedures at CPSES as supplemented by the pump and valve operability and surveillance and maintenance programs provided reasonable assurance of compliance with pertinent requirements regarding environmental qualification of safety related mechanical equipment (e.g., GDC-4 and Appendix B to 10 CFR Part 50). During these discussions, however, the Staff sought additional assurance of compliance, and accordingly, directed Texas Utilities to conduct a study of the environmental qualifications of three pieces of safety related mechanical equipment selected by the Staff. By letter of December 14, 1982, reference (1), the Staff stated that, if this additional study of selected equipment was satisfactory, environmental qualification of mechanical equipment at CPSES would be accepted.

Texas Utilities provided this additional information on March 30, 1983, reference (2). After satisfactorily responding to questions regarding the submittal, Texas Utilities was informed by the Staff that the submittal was adequate and the issue was closed. This position was documented in an internal Staff letter dated August 15, 1983, from James P. Knight to Thomas M. Novak.

Now, by letter of December 16, 1983, reference (3), the Staff informs Texas Utilities that the issue is to be reopened and Texas Utilities will be required to conduct a new review and evaluation of all safety related mechanical equipment located in areas of potentially harsh environments. Significantly, the rationale for this backfit is not new technical information or additional concerns, but rather the fact that the schedule for CPSES has slipped and, as a result, the Staff now feels that it has time to conduct a 100 percent review of all such equipment, as it had done at some other plants. Texas Utilities maintains that this attempt to justify the Staff's backfit is totally without technical merit and falls far short of the justification required.

A delay in the CPSES schedule has absolutely no bearing on the adequacy of mechanical equipment qualification. Further, as a practical matter, if the Staff believes that a delay in schedule means that Texas Utilities now has available resources which can be devoted to conducting a new paper chase, the Staff is mistaken. A delay in schedule simply means that Texas Utilities could not meet its earlier schedule and all resources are fully committed to meet the new schedule.

In addition, the Staff's position that the backfit is justified because the Staff has conducted more complete reviews at other plants is equally flawed. Absent indications of an industry-wide problem, the extent of Staff review of other plants should be dictated by a technical judgement as to the condition of that plant. The staff made that technical

judgement regarding CPSES in November 1982. The judgement was based on factors including the programs at CPSES as well as Texas Utilities' early commitment to IEEE 323-1974 and strong emphasis on equipment qualification. Significantly, subsequent to this decision, no new technical information regarding CPSES has been presented that would call into question this judgement. Further, we are not aware of any applicable generic safety concerns which have arisen from the Staff's reviews of either operating plants or NTOLS. It is still the view of Texas Utilities that the environmental qualification of the safety related mechanical equipment at CPSES has been adequately established and that no justifications for interim operation are required.

In sum, Texas Utilities maintains that the NRC Staff's attempts to impose a backfit requiring Texas Utilities to conduct a substantial study of all safety related mechanical equipment in areas of potentially harsh environments at CPSES are unjustified from either a technical or legal perspective. Texas Utilities objects to the Staff position and requests a meeting with Staff management to discuss and resolve the issue.

Sincerely,

BR Clement

for R. J. Gary

RJG/grr

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