

TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER - DALLAS, TEXAS 75201

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December 16, 1983

Mr. B. J. Youngblood, Chief
Director of Nuclear Reactor Regulation
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
CONTAINMENT ISOLATION VALVE LEAK RATE TESTING

Dear Mr. Youngblood:

Safety Injection valves 1-8802A, 1-8802B and 1-8840 are normally closed containment isolation valves that are required to operate during accident conditions. As has previously been discussed with the Containment Systems Branch, during accident conditions, the lines containing these valves are pressurized in excess of maximum containment pressure from a single failure proof source. Since these valves are normally closed it has been suggested by the NRC that should these valves fail to open during the accident, containment atmosphere could leak through the valve stem packing. It is the CPSES position that containment atmosphere leakage through the stem packing is highly improbable for the following reasons:

1. Following the postulated break, the affected line retains a large volume of water as a water seal. This water seal must leak through the packing before any containment atmosphere can leak out.
2. In order for any containment side leakage at all to occur, leakage must first occur past the seat-disc seal from the containment side, but not from the pump side. Although this is possible it is not very probable.
3. Even should containment side seat-disc seal leakage occur, leakage must also occur through the valve stem double seal system, which is specifically designed to prevent leakage.
4. Both the seal-disc seals and the double stem seals were designed to operate against system pressure. During the postulated accident the maximum pressure seen by these seals will be 52 psi. Therefore, if no leakage has been observed from the stem seals during normal operation, none should be expected during the postulated accident.

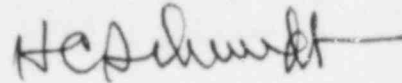
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In summary, these valves are required to operate during the postulated accident. Should they open as required, pump pressure in excess of containment pressure prevents containment leakage. Should the valves fail to open items 1 through 4 apply which again implies containment leakage through these paths is highly improbable. On this basis it is the CPSES position that type "C" testing of the subject valves is not required.

Should you have additional question in this matter please contact this office.

Respectfully,

A handwritten signature in dark ink, appearing to read "H. C. Schmidt", with a long horizontal stroke extending to the right.

H. C. Schmidt

BSD/grr