

TEXAS UTILITIES GENERATING COMPANY

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

Log # TXX-4162  
File # 10035

April 30, 1984

BILLY R. CLEMENTS  
VICE PRESIDENT, NUCLEAR OPERATIONS

Mr. D. G. Eisenhower, Director  
U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Division of Licensing  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
SUPPLEMENT 2 TO THE CPSES RESPONSE  
TO GENERIC LETTER 83-28

Dear Mr. Eisenhower:

Enclosed are forty copies of Supplement 2 to the CPSES response to NRC Generic Letter 83-28. This supplemental information addresses Sections 2.1 and 2.2.2 of the generic letter.

Respectfully submitted,

*Billy R. Clements*

BRC/grr  
Affidavit  
Enclosure

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PDR ADOCK 05000445  
A PDR

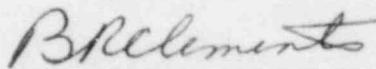
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
TEXAS UTILITIES GENERATING COMPANY ) Docket Nos. 50-445  
 ) 50-446  
(Comanche Peak Steam Electric )  
Station, Units 1 and 2) )

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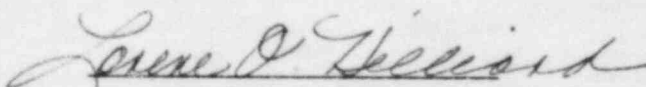
B. R. Clements being duly sworn, hereby deposes and says that he is Vice President, Nuclear Operations of Texas Utilities Generating Company, the Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to NRC Generic Letter 83-28 with respect to the captioned facilities; 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.



B. R. Clements  
Vice President, Nuclear Operations

STATE OF TEXAS )  
 ) ss  
COUNTY OF DALLAS )

Subscribed and sworn to before me, a Notary Public in and for Dallas,  
on this 1st day of May, 1984.



Notary Public

My commission expires June 1, 1985.

SUPPLEMENT 2 TO THE CPSES  
RESPONSE TO NRC GENERIC LETTER 83-28  
"REQUIRED ACTIONS BASED ON GENERIC  
IMPLICATIONS OF SALEM ATWS EVENTS"

April 30, 1984

## CPSES

### VENDOR INTERFACE CPSES PROGRAM DESCRIPTION

#### 2.1 Reactor Trip System

Westinghouse, the CPSES NSSS vendor, has an established interface program to supply technical information to its customers. That program includes information about the reactor trip system, and includes a positive-feedback feature to ensure proper receipt by customers of all of the information distributed by the program.

CPSES has been participating and will continue to participate in this program.

#### 2.2 ALL SAFETY-RELATED COMPONENTS

Texas Utilities has been an active participant in the Nuclear Utility Task Action Committee (NUTAC) on Generic Letter 83-28, Section 2.2.2. Texas Utilities agrees with the conclusions stated in the NUTAC's final report (INPO 84-010 (NUTAC)), and endorses the NUTAC position that existing programs and activities, with appropriate enhancements, provide a mechanism that effectively addresses the need identified in the Generic Letter. The programs and activities that are used at CPSES are the Nuclear Plant Reliability Data System (NPRDS), the Significant Event Evaluation and Information Network (SEE-IN), and the existing interface with our NSSS vendor, Westinghouse. These programs and activities are discussed further below.

##### NPRDS

CPSES is committed to active participation in the NPRDS network. It is our intent to have this system fully implemented prior to

## CPSES

commercial operation of CPSES Unit 1. We are presently assembling the information necessary to load the Unit Information Records into the data base. Additionally, we are developing procedures for preparing and transmitting NPRDS failure reports. Future changes to techniques or procedures recommended by INPO or by the NPRDS users group will be evaluated and incorporated as appropriate.

### SEE-IN

Procedures are already in place for evaluating and disseminating information from the SEE-IN program. The procedures require evaluation and classification to determine the applicability and urgency of the information. They also control dissemination of the information and follow-ups to ensure timely and adequate implementation of recommendations. Finally, procedures require the evaluation of all internally generated problem reports for possible value to other utilities and dissemination to INPO and other utilities via NUCLEAR NETWORK.

### VENDOR INTERFACE

Procedures are already in place for controlling vendor/utility interactions. As stated above, Westinghouse has established a positive feedback system to ensure proper receipt of all technical information concerning the NSSS systems. Evaluations and follow-ups on vendor information such as Westinghouse Technical Bulletins and General Electric Service Advisories are conducted in the same manner as the SEE-IN information described above. Additionally, changes to Technical Manuals are reviewed for their impact on plant operating or maintenance procedures using a cross index of procedures affected by or directly referencing technical manuals. If appropriate during the evaluations, the vendor may be directly contacted to clarify or supplement the information required.

## CPSES

Texas Utilities will contact other appropriate vendors whenever we determine that faulty or missing vendor-supplied information contributed to an actual or potential failure at CPSES, and whenever we conclude that such contact is necessary or could be beneficial.

SUPPLEMENT 2 TO THE CPSES  
RESPONSE TO NRC GENERIC LETTER 83-28  
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April 30, 1984



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