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

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

May 15, 1984
TXX #4169

Mr. Harold R. Denton
Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Comanche Peak Steam Electric Station
Dockets Nos. 50-445 and 50-446
Deferred Preoperational Testing Items to be Conducted After Fuel Load of Unit 1

Dear Mr. Denton:

As discussed with you at our meeting on May 7, 1984, we propose to defer certain pre-operational tests until after fuel load. Deferral of these tests will facilitate the overall scheduling of plant activities leading up to initial criticality. We will submit a description and a summary safety evaluation of each test proposed for deferment to you for NRC staff review and concurrence. Subsequent to NRC concurrence, we also will submit FSAR changes to Chapter 14, as appropriate.

The first test proposed for deferment concerns three items associated with pre-operational testing on the Main Steam Isolation Valve and is described in the attachment. As noted in the attachment, our evaluation indicates that deferral of this item does not constitute an unreviewed safety question and does not require any Technical Specification exceptions. We request your concurrence with our proposal to defer this test until after fuel load but prior to initial criticality.

If you have any questions concerning this request, please contact me to arrange a meeting with the appropriate members of my staff.

Sincerely,

Billy R Clements

BRC:msc

Attachment

c: Mr. John T. Collins
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission

B001
1/1

Deferred Preoperational Testing of
the Main Steam Isolation Valves (MSIV's)

Description and Scope:

The original Greer MSIV valve operators have been replaced with Rockwell operators to provide a longer qualified life time under current regulatory requirements for environmental qualification. This will require conducting Preoperational Test 1CP-PT-34-01, "Main Steam Isolation Valves" again. The testing required to close out this preoperational test include:

a. Demonstrate the MSIV 5 second stroke time

b. Demonstration of MSIV operability 30 minutes after a loss of air occurence

c. Demonstrate MSIV auto test timing, i.e., verify limit switch settings

Stroke testing of the MSIV's requires steam on the upstream side to prevent possible valve guide and seat damage. It is our plan to conduct the above testing after fuel load (but prior to initial criticality), when the next plant heatup is expected to occur. This testing would be conducted during Mode 4 and would demonstrate the operability of the MSIV's prior to entering Mode 3. This testing has been incorporated into initial startup Procedure ISU-234A, "Main Steam Isolation Valves Operability and Response Time." This test procedure has been reviewed and approved by our Station Operations Review Committee.

Summary Safety Evaluation:

A review of this deferred item was conducted per 10CFR50.59. This review was performed to determine if deferral of this preoperational testing would constitute an unreviewed safety question or require a change to the draft CPSES Technical Specifications. Qualitative evaluation of the appropriate Chapter 15 events provided the bases to the conclusion that no technical specification exceptions are required and no unreviewed safety questions exist for conducting this test in Mode 4. Incidents from FSAR Chapter 15 considered in this evaluation include:

15.1 Inadvertent opening of steam generator relief, safety or dump valve.

15.1 Steam system piping failure

15.2 Feedwater system pipe break

15.6 Steam generator tube failure

If any of the accidents discussed above were to occur prior to testing the Main Steam Isolation Valves, there would be no radiological consequences since the reactor will not have yet achieved initial criticality.

The appropriate Technical Specification for this equipment is Section 3.7.1.5 "Main Steam Line Isolation Valves". The limiting condition for operation requires the MSIV's to be operable during Modes 1, 2, and 3. Since this testing is being conducted in Mode 4, with RCS temperature approximately 340°F to 350°F, no exceptions are required to the technical specifications. Therefore, since no adverse effects are associated with the deferral of this item, it is proposed that this test be permitted after fuel load but before initial criticality.