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File # 10119
GL 91-13
Ref. # 10CFR50.54(f)

TU ELECTRIC

March 16, 1992

William J. Cahill, Jr.
Group Vice President

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
REQUEST FOR INFORMATION-ESSENTIAL (STATION) SERVICE
WATER SYSTEM, NRC GENERIC LETTER 91-13

REF: Request for Information Related To The Resolution of
Generic Issue 130, "Essential Service Water System
Failures At Multi-Unit Sites," Pursuant To
10CFR50.54(f)-Generic Letter 91-13

Gentlemen:

NRC has issued Generic Letter (GL) 91-13 (Reference) to inform the licensees of technical findings regarding the resolution of Generic Issue-130. In addition, the Generic Letter requests information regarding the applicability and implementation of the suggested Technical Specifications and the emergency procedure improvements for a Loss of Service Water (LOSW) event. The NRC believes that the estimated benefit from the identified safety enhancements will be a reduction in the core damage frequency and a reduction in the associated risk of offsite radioactive releases as a result of Essential Service Water System failure. The following response is provided to this request.

DESCRIPTION OF STATION SERVICE WATER CROSSTIE:

CPSES has two 100 percent capacity Station Service Water pumps per Unit. These four pumps have crosstie capability such that any pump may supply any other pump's cooling loads. The unit crosstie piping is ASME Class 3 and contains five manual gear operated butterfly valves (XSW-0006, XSW-0007, XSW-0008, XSW-0028 and XSW-0029). Each train's crosstie isolation valve is maintained in the normally closed position. The Unit 1/Unit 2 crosstie valve (XSW-0006) is presently locked closed during the construction of Unit 2 and will be maintained in the normally closed position during two unit operation. To establish a crosstie between the Units, three of these valves (including XSW-0006) must be opened (See Figure 1).

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GL 91-13 ADMINISTRATIVE IMPROVEMENT (FIRST BULLET ON PAGE 2):

"Technical specification (TS) changes contained in Enclosure 1 [of GL 91-13] to enhance the availability of the [Emergency Service Water System] ESWS as applied to the design configuration of affected plants."

CPSES RESPONSE:

TU Electric has reviewed the recommendations of Generic Letter 91-13 and will propose a revision to the CPSES Technical Specifications and their Bases to address the concerns of the Generic Letter 91-13.

GL 91-13 ADMINISTRATIVE IMPROVEMENT (SECOND BULLET ON PAGE 2):

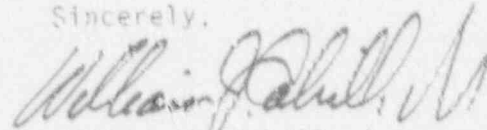
"Improvement of emergency procedures for LOSW using existing design features, specifically: (a) operating and maintaining high-pressure injection (HPI) pump integrity in the event of loss of reactor coolant pump (RCP) seals as a result of ESWS failure, and (b) testing and manipulating the ESWS crosstie between the units during a LOSW accident."

CPSES RESPONSE:

TU Electric reviewed both the abnormal and emergency procedures for LOSW conditions and concluded that the existing CPSES Unit 1 procedures adequately address the above recommendations. The CPSES Unit 2 procedures will address these recommendations in a similar manner.

The proposed change to the Technical Specifications and their bases are expected to be incorporated into the CPSES license upon issuance of the CPSES Unit 1 and 2 combined Technical Specifications. The affected Unit 2 procedures will be implemented upon issuance of the Unit 2 operating license. Supporting documentation for GL 91-13 responses will be available at the CPSES site for NRC review after completion of all action items for each Unit.

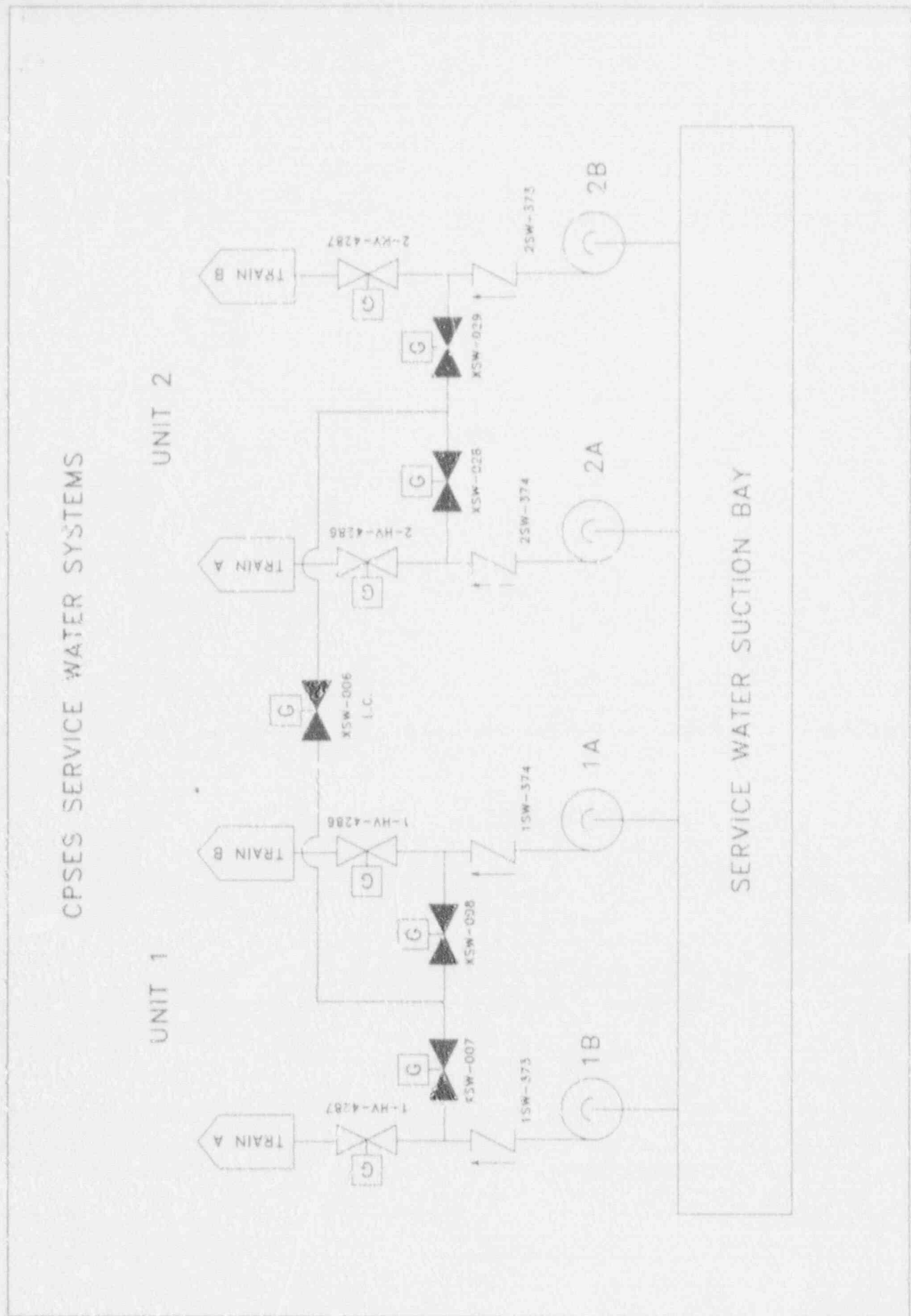
Sincerely,



William C. Cahill, Jr.

MCP/gj
Attachments

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. M. B. Fields, NRR

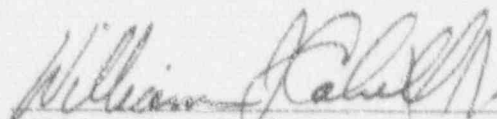


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

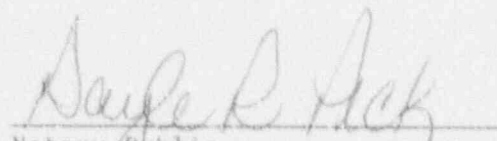
AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to NRC Generic Letter 91-13; for the captioned facility; 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.


William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF DALLAS)

Subscribed and sworn to before me, on this 16th day of March, 1992.


Notary Public