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TU ELECTRIC

March 31, 1992

William J. Cahill, Jr.
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO NRC REQUEST FOR ADDITIONAL
INFORMATION - STATION BLACKOUT SAFETY EVALUATION

- REF: 1) TU Electric letter logged TXX-901008 from
William J. Cahill, Jr. to the NRC, dated
November 5, 1990
- 2) TU Electric letter logged TXX-91426 from
William J. Cahill, Jr. to the NRC, dated
November 22, 1991

Gentlemen:

In Reference 1, TU Electric submitted to the NRC, the CPSES Station Blackout (SBO) submittal pursuant to 10CFR50.63, "Loss of All Alternating Current Power." Reference 2 was a supplemental response, as a result of additional NRC questions. In addition, Reference 2 states that equipment required to cope with an SBO is safety-related and included in the CPSES QA program; except for the turbine stop valves, which are surveilled and maintained per the CPSES Technical Specifications. TU Electric provides the following clarification of this statement. In addition to the turbine stop valves, indication for equipment required to cope with an SBO is non-safety related. However, administrative controls are in place which require control board walkdowns on a shift basis. The CPSES FSAR Chapter 15 analysis also takes credit for this instrumentation.

In a letter dated February 27, 1992, the NRC issued the CPSES SBO Safety Evaluation for Unit 1. The Staff concluded that additional information is required to assess TU Electric's conformance to the SBO rule.

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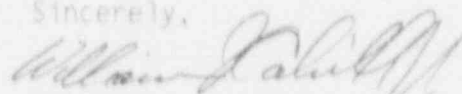
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Specifically, the Staff requested that TU Electric provide, in writing, within 30 days, a detail description of the control room temperature analysis. In addition, the Staff requested that TU Electric provide confirmation regarding CPSES implementation of the NRC recommendations identified in the Safety Evaluation. The recommendations addressed the following:

- (1) Temperature analyses for dominant area of concerns.
- (2) Proposed UPS inverter room design modification.
- (3) QA and surveillances for SBO equipment.
- (4) EDG reliability program.

Attached is the CPSES temperature analysis for the control room. TU Electric intends to submit a dual Unit SBO response. A preliminary review of Units 1 & 2 indicates that the proposed UPS inverter room design modification, as noted in the Unit 1 SBO submittal, is not required. Therefore, the commitment to implement the proposed design modification in a refueling outage at least 120 days after receipt of the NRC's Safety Evaluation, is no longer appropriate. To allow time to complete the dual Unit SBO response, TU Electric hereby proposes to implement the proposed design modification during the second refueling outage, following NRC approval. However as part of the dual Unit SBO submittal, TU Electric will assess the necessity of the proposed design modification and implementation schedule, if required. In addition, TU Electric will ensure that documentation is available which addresses the NRC recommendations in the above areas.

Sincerely,



William J. Cahill, Jr.

VPC/gj
Attachment

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. I. A. Bergman, NRR
Mr. B. E. Holian, NRR

