



Log # TXX-96053  
File # 916 (5.6)  
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C. Lance Terry  
Group Vice President

February 23, 1996

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) UNITS 1 AND 2  
DOCKET NOS. 50-445 AND 50-446  
COMMENTS ON THE SAFETY EVALUATION BY THE NUCLEAR  
REACTOR REGULATION RELATED TO LICENSE AMENDMENTS NOS. 46 AND 32  
TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89  
(SPENT FUEL STORAGE CAPACITY INCREASE)

- REF: 1) TU Electric letter logged TXX-94325, from C. L. Terry to the NRC, dated December 30, 1994  
2) NRC letter from Timothy J. Polich to C. Lance Terry, dated February 9, 1996 (Comanche Peak Steam Electric Station, Units 1 and 2 - License Amendment Nos. 46 and 32 to Facility Operating License Nos. NPF-87 and NPF-89, TAC NOS. M91244 and M91245).

Gentlemen:

TU Electric transmitted License Amendment Request 94-022 (Reference 1) which revises the specification for fuel storage to authorize usage of the high density fuel storage racks, to increase the spent fuel storage capacity, and to adopt the wording, content, and format of the Improved Standard Technical Specifications. The License Amendment Request 94-022 was supplemented by letters dated July 28, 1995, (TXX-95187); September 14, 1995, (TXX-95235); November 29, 1995, (TXX-95299); and January 2, 1996, (TXX-96003).

This letter provides TU Electric's comments on certain statements contained in the Safety Evaluation (Enclosure 3 to Reference 2).

On page 3 of the Enclosure 3 to Reference 2, there is a statement regarding criticality assumptions, "Neutron absorption effect of structural material is neglected." More specifically, the neutron absorption effect of "spacer" material is neglected. This is consistent with item 11 on page 3-9 of Enclosure 1 to Reference 1. The neutron absorption effects of other fuel storage rack structural materials are included in the criticality calculations.

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Section 2.3 of the Enclosure 3 to Reference 2 states that "... a period of 4.5 years of full power was assumed for all stored fuel." As stated in TXX-94325, the decay heat load assumptions were based on 18 month fuel cycles with 45 day outages (e.g., 16.5 months at full power per cycle in lieu of 18 months). The number of fuel assemblies in each offload (193 fuel assemblies) and previous refueling discharge (e.g. 94 fuel assemblies each) were assumed to be a mix of 2 cycle (33 months at full power) and 3 cycle (49.5 months at full power) assemblies.

Section 2.3 of the Enclosure 3 to Reference 2 contains descriptive information which includes values which describe TU Electric's analyses (e.g. 191°F, 139°F, 176°F, 106 GPM, 210 GPM, 126 GPM, and "3 assemblies per hour"). These values may change if the analyses are revised but the acceptance criteria in the Safety Evaluation (e.g., "... the maximum SFP bulk temperature for the abnormal full core offload condition ... [will be] calculated to be below the temperature associated with the onset of bulk boiling ...") will continue to be met.

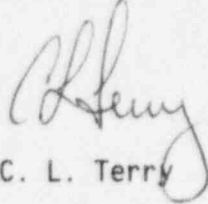
On pages 11 and 12 of Enclosure 3 to Reference 2, there is a statement, "...TU Electric commits...to (1) implement a surveillance program that inspects and maintains the originally installed rack gaps after the occurrence of an earthquake equivalent to or larger than an OBE, (2) to submit analysis results for NRC review if any discrepancy is found after rack installation that the as-built clearances between the storage racks and the spent fuel pool wall are less than those assumed in the analysis...." TU Electric will comply with this commitment by maintaining a surveillance program to verify the rack-to-rack and rack-to-wall gaps after the occurrence of an earthquake equivalent to or greater than an OBE. In the event that the gaps measured subsequent to an OBE are outside of installation tolerances, an engineering evaluation will be performed to demonstrate the acceptability of the as found gaps. TU Electric will either restore gaps within original tolerances or make the analysis which demonstrates the acceptability of the as found gaps available to the NRC. TU Electric has installed the racks within installation tolerances and obtained as-built measurements to be used in the engineering evaluation performed subsequent to an OBE.

On pages 11 and 12 of Enclosure 3 to Reference 2, there is a statement, "... TU Electric commits...to establish a safe load path that will prevent or will not increase the probability of an accidental dropping of a fuel assembly onto the liner of the spent fuel pool structure." TU Electric has revised the appropriate procedure to state that spent fuel assembly travel over open liner areas should be minimized to limit the potential of dropping an assembly onto the spent fuel pool liner. This procedure revision satisfies this commitment.

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Should you have any questions, please contact Carl B. Corbin at  
(214) 812-8859.

Sincerely,



C. L. Terry

CBC/cbc

c - Mr. L. J. Callan, Region IV  
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