

COMANCHE PEAK STEAM ELECTRIC STATION

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COMMENT MATERIAL CHANGE EVALUATION REPORT 0001  
NOVEMBER 1, 1994 - FEBRUARY 1, 1996

TEXAS UTILITIES ELECTRIC COMPANY

COMANCHE PEAK UNITS 1 AND 2  
COMMITMENT MATERIAL CHANGE EVALUATION REPORT 000

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CMCE NUMBER  
CMCE-94-002

Commitment Number: 25623  
Revision: x

Source Document (Level 0): IR-445/9103  
TXX-91166  
EA-91-015

**Original Commitment Criteria (Overview):**

The commitment criteria identified fire watch responsibilities, watch manning, training, record/log keeping activities and prohibition of performing other duties while performing roving fire watches. These criteria were generated due to an Enforcement Action while CPSES was in the construction phase.

**Revised Commitment Description (From CMCE):**

(A) (25623) The following aspects relating to fire watch activities are included in the implementing procedure (STA-729): a) The "responsibilities" of the Fire Protection Supervisor are listed to provide oversight of the fire watch activities, b) The "responsibilities" of the responsible work organization are listed to assure that there are adequate numbers of trained fire watch personnel and the performance and documentation of the fire watch activities is controlled, c) The basic performance and requirements of a roving fire watch, d) Requirements are listed pertaining to the documentation of the fire watch activities giving specifics on how often the documentation should be completed and e) Requirements are listed such that personnel performing fire watch activities complete the designated inspections within the allowed time frame.

(B) (25624) Periodic field verifications are performed to assure proper performance of roving fire watch activities which include: a) Checking of documentation, b) Questioning fire watch personnel concerning their assigned duties and c) Verifying that the assigned duties are performed within the allowable time frame.

(C) (25625) A formal training program is administered to personnel involved in fire watch activities which includes: a) Class room training for fire watch personnel and their supervisors, b) On - the - job training (knowledge verification) for fire watch personnel which is given by their supervisor, and c) On - the - job training (knowledge verification) for fire watch activity supervisors which is given by the Fire Protection Supervisor or designee. The Fire Protection Supervisor or designee will periodically monitor the training class to assure proper implementation of the training activities.

CMCE NUMBER  
**CMCE-94-002 (continued)**

**Justification for Change** ( *This is to include any identified rationales and conclusions noted in the CMCE*):

These commitments were formulated following the Fire Watch NOV in 1991 to assure completion of the compensatory measure fire watch activities. They were targeted towards the construction environment and developing a fail proof method to accomplish fire watch activities. Subsequent to this event, the site has been in an operational phase and dedicated personnel have been performing the fire watch activities. Current preventive measures, training and continued interface has assured the continual success of the program.

Certain aspects of these commitments are no longer applicable due to a shift in methodology. Specifically, checking a fire watch's performance by comparing time requirements with a security keycard usage printout is limited in effectiveness as a monitoring tool due to the de-vitalization of some plant areas which no longer require the use of keycards. Preventive measures, training and continual interface will assure the continued success of the program.

Current plans are to have the Security group perform the roving fire watch activities. This will be in conjunction with their current patrol activities. These activities are complimentary and will not interfere with the proper performance of either fire watch or security duties. This will actually enhance the fire watch program due to having a larger force of individuals in the field at all times complimenting the individual(s) with specific fire watch activity assignments and allowing more flexibility in scheduling personnel. If a security event occurs where the fire watch assignment cannot be completed by the assigned individual(s), a back-up person will be sent to complete the remaining portion of the assignment and continue until the Security Officer(s) is able to return.

The changes that are proposed shift from a regimented, route driven activity to focusing solely on the completion of the required inspection activities. This will give us the flexibility to allow one or more persons to complete the activity within the specified time frame. The overall intent has not changed.

CMCE NUMBER  
CMCE- 94-004

Commitment Number: 23559  
Deletion: X

Source Document (Level 0):

- (1) NRC Inspection Report 50-445/83-33
- (2) NRC Inspection Report 50-445/89-43
- (3) TU Electric Response Letter to [Ref. 2]; TXX-89716
- (4) NRC Inspection Reports 50-445/90-44 , 50-445/9110 , 50-445/93-25 , 50-445/94-04 , etc

**Commitment Description (From CMCE):**

Commitments associated with NRC Inspection Report 50-445/83-33 have been deleted associated with the Emergency Plan due to rebenchmarking the Emergency Preparedness program.

During the period of September 26 through October 7, 1983, the NRC conducted an inspection of the Emergency Preparedness Program (EPP) at Comanche Peak Steam Electric Station (CPSES) [Ref. 1]. The objective of the inspection was to evaluate the overall adequacy of the development and implementation of the program. The results of the inspection identified many areas and individual items which required either corrective actions, ongoing development, plan implementation or reassessment. This was the original benchmark review of the EPP at Comanche Peak Steam Electric Station. CPSES undertook and extensive effort to reform the Emergency Preparedness Program to resolved items.

In 1986, TU Electric put its Emergency Preparedness Program on hold pending resolution of construction concerns and a revised operation schedule. In June, 1989, the NRC conducted another appraisal of the Emergency Preparedness Program [Ref. 2]. The Appendices (A and B) to the inspection report, contained an inclusive listing of all outstanding onsite EPP items at CPSES. The inspection report transmittal letter identified that the findings of the prior EPP inspection [Ref. 1], were considered closed since the present [Ref. 2] inspection replaced those findings.

Subsequent to the 50-445/89-43 NRC inspection (February, 1989), two actions took place which addressed the items noted in the Appendices to the report and to prepare for the NRC acceptance of the Emergency Preparedness Plan. In July 1989, TU Electric conducted an exercise which was designed to satisfy the conditions of 10CFR50, Appendix E, IV, F.1 (an exercise within 1 year of the issuance of a full power license). In response to the 1989 inspection [Ref. 3], CPSES described the planned actions for correcting each of the items contained in Appendix A and our considerations of each of the items in Appendix B of the inspection report.



CMCE NUMBER  
CMCE- 94-004 (continued)

Commitment Number: 23559

**Justification for Change** ( *This is to include any identified rationales and conclusions noted in the CMCE*):

The identified commitments were tested against the Safety Significance Review criteria, and were found that they could NOT negatively impact the ability of a system, structure or component to perform its safety function. The changes were also revised against 10CFR50.54 criteria. No actual program changes were implemented as a result of commitment reduction.

The subject commitments identified '*method of compliance*' processes and were evaluated to determine if any change(s) (ie. rebenchmarking) would still preserve compliance with the obligation/requirement(s). The rebenchmarking process preserves compliance to the original intent of the commitments and preserves compliance. Because the rebenchmarking meets the above criteria and only makes minor changes to the processes used for compliance (ie. recognizes and complies with the later NRC Inspection Report 445/8943) (and potentially improve the overall ability to maintain compliance), AND the commitments have already been implemented, the licensee can make the changes and provide notification to the NRC in the Commitment Update Annual Report.

Based on the inspection report 50-445/89-43 transmittal letter information, subsequent NRC inspections, FEMA assessments and EPP graded exercises conducted at CPSES since the 1989 appraisal; Comanche Peak Steam Electric Station is establishing a new benchmark date for the Emergency Preparedness Plan and any associated commitments founded upon the [Ref. 2] NRC inspection report transmittal letter and subsequent appraisals [Ref 4].

CMCE NUMBER  
CMCE- 95-013

Commitment Number: 19622  
Deletion: X

Source Document (Level 0): INSPR-445/89-02

**Commitment Description (From CMCE):**

This commitment is being deleted as applicable to CPSES. TU Electric management assured the (NRC) inspectors that any intent or criteria change to a procedure on instruction [initially approved by SORC] would be reviewed by the SORC prior to implementing the procedure for use. *Note:* The bracketed words in the above commitment were discussed and accepted by NRC inspector S. Burris T. Heatherly on 03/02/89.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

This commitment originated in the NRC inspection report above (prior to receiving an Operating License), which cited inappropriate work practices involving procedure changes. Technical Specifications and procedures are now in place which delineates the Station Organization Review Committee (SORC) responsibilities with regard to procedure reviews. Other commitments maintained in the Commitment Tracking System and implemented by station procedures delineate the current requirements for SORC review of procedures.

CMCE NUMBER  
CMCE-95-014

Commitment Number: 23025  
Revision: 2

Source Document (Level 0): TXX-890258  
GL-85-02

**Original Commitment Criteria (Overview):**

The original commitment also required that eddy current examination be performed on at least 10% of the condenser tubes in one tube bundle every other refueling outage as part of the initial response to the NRC Generic Letter 85-02. The required testing was performed during refueling outages 1RFO1, 1RFO3 and 2RFO1.

**Revised Commitment Description (From CMCE):**

Preventive Maintenance (PM) Guidelines will be revised such that CPSES will schedule (1) visual examinations of the condenser shell and water boxes every other refueling outage. Such PM activities will be implemented in accordance with Preventive Maintenance Program Procedures.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

As a result of a design modification and the consequent reevaluation of the Preventive Maintenance program, TU Electric provided a revised response to the Generic letter via the source document letter noted above. The design modification was to replace the main condenser copper-nickel tubes with titanium tubes. The purpose of the modification was to reduce the copper content in the secondary system and to reduce the condenser tube degradation. The modification minimized 'steam side' problems associated with steam and condensate erosion of the tubes, air removal, mechanical damage and structural design.

The results of testing performed during the outages did not indicate any service related defects. A small number of tubes were plugged; all of which possessed manufacturing related defects.

Several tubes in Unit 1 have been plugged during to service failure, however, these were not detected using eddy current but rather identified at power using on-line instrumentation. These failures were due to foreign material in the system.

Past experience with steam generator sludge volume, hideout return, chemistry specification compliance and tube inspection indicate that the controls for controlling and monitoring



CMCE NUMBER  
**CMCE-95-014 (continued)**

**Commitment Number:** 23025

secondary side chemistry are effective. Considering the experience to date with condenser eddy current and steam generator tube integrity, it is recommended that the commitment to perform periodic eddy current testing of the condenser tubes be deleted.

CMCE NUMBER  
CMCE-95-015

Commitment Number: 06737  
Deletion: x

Source Document (Level 0): ANSI-N18.7-1976  
Reg Guide 1.33  
FSAR Ammendment 93

**Commitment Description (From CMCE):**

Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

FSAR, chapter 1A(B) deliniates which portions of Reg Guide 1.33 and its implementing documents apply to plant procedures. Ammendment 93 (February 1, 1995) of the FSAR eliminated the procedure review requirement of "no less frequently than every two years..." no longer applicable. Commitment 26823 was initiated to reflect the new FSAR commitment for procedure review criteria.

TU Electric believes that the intent of the biennial review is accomplished by other CPSES controls which make the biennial review redundant and as such the biennial reviews represent an unnecessary expenditure of CPSES Management and staff resources which do not produce an overall safety benefit.

CMCE NUMBER  
CMCE-95-020

Commitment Number: 18239  
Deletion: X

Source Document (Level 0): SSER17, Appendix A

**Commitment Description (From CMCE):**

The pump vendor will be contacted to verify that pump [Component Cooling Water (non-seismic)] can withstand the reduction in suction pressure for the length of time postulated (30 seconds).

J.J. Henly/SWEC requested by letter dated 1-13-89 approval from Bingham Pump Corporation.. Gordon Parks of Bingham Pump Corporation responded on February 7, 1989 with approval. Both letters are filed in Job Book 27-4-34-6.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

Deletion of the commitment is acceptable based on current limiting MELB analysis which indicates sufficient pump NPSHA. There is no need to continue confirmation of pump performance with the vendor.

The commitment arises from the interpretation that the 10 inch non-safety CCW lines under consideration were non-seismically supported/analyzed. The NRC reviewer asked for confirmation that the CCW pump NPSH criteria was satisfied during the dynamic transient that ensued. An analysis was performed that demonstrated that the pump NPSHR was not satisfied during the 30 second transient. The pump manufacture was contacted and they confirmed that the pump would perform in an acceptable manner during and following the transient.

Deleting this commitment has no impact upon the ability of the CCW system to perform its safety function. This commitment represents a scenario that was determined to be beyond the design basis and is not currently in the MELB analysis of the CCW system.

The Commitment was related to a response in SSER 17, Appendix A. The basis of the safety decision is that the CCW system would be able to perform its function following the design basis MELB. The reevaluation and redefinition of the limiting MELB transient does not impact this safety decision.

CMCE NUMBER  
CMCE-95-024

Commitment Number: 16698  
Revision x

Source Document (Level 0): TXX-88049  
TXX-91193  
TXX-7128

**Original Commitment Criteria (Overview):**

The procedure also noted that subsequent to the implementation of the procedure, changes could not be implemented by a drawing revision. The commitment did not apply to Unit 2 drawing control. NOTE: This commitment was originally generated during the construction phase of CPSES. Operational activities associated with Design Changes are controlled via this revised commitment and other commitments.

**Revised Commitment Description (From CMCE):**

To prevent recurrence, TU Electric Design Change Authorization Procedure ECE 5.01, Rev.0 was issued effective March 2, 1987. This procedure established the mechanism for documenting and controlling design changes.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

The restriction on the use of drawing revisions for making design changes was cited as a corrective action for SDAR-CP-87-123, "Terminations Not in Accordance with Design Drawings" and was intended to be an enhancement to the existing design control program. The original deficiency identified in the SDAR involved cables which were not terminated IAW the design drawings. These conditions were a result of changes issued by drawing revisions versus DCAs and were not readily identifiable for implementation by the construction organization.

Implementation of the new modification process which involved an interdisciplinary team concept for design modifications assure readily identifiable products for the construction/operations organization(s).

CMCE NUMBER  
CMCE-95-027

Commitment Number: 25682  
Deletion:  $\lambda$

Source Document (Level 0): TXX-91220  
IR-445/9118

**Commitment Description (From CMCE):**

Main coolant system crossover leg restraints shall be inspected to current design documents in accordance with the established QA/QC Program. The inspections shall be completed no later than August 24, 1984. (Response to Inspection Report 84-08)

This item closed by NRC in IR 445/88-82; 446/88-78

**Justification for Change** ( *This is to include any identified rationales and conclusions noted in the CMCE*):

The commitment to perform constructability reviews originated from a response to an NRC violation involving components which were installed in configurations that did not match the design drawing. In addition, the subsequent QC inspections of these components failed to detect the incorrect installations.

Implementation of the new modification process which involved an interdisciplinary team concept for design modifications assure readily identifiable products for the construction/operations organization(s). The Core Team will direct, monitor and control the implementation of the modification from initial development through close out.



CMCE NUMBER  
CMCE-95-028

Commitment Number: 26101  
Deletion: ☒

Source Document (Level 0): TXX-92364  
TXX-92279  
IR-445/9220  
1LER-92-013-00

**Commitment Description (From CMCE):**

The Design Modification Review Group (DMRG) and associated safety review involvement in the design modification assessments will be strengthened. The DMRG will assure that operations impact assessments of the impact assessments of design modifications on procedures and training are complete prior to SORC approval of the modifications.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

The commitment to have DMRG review operations impact assessments originated from response to an NRC violation. The new modification process will involve formation of a team responsible for the modification from start to finish. This team will include "stakeholders" who are responsible for identifying impacts, inputs and other considerations. Therefore, although not specifically performed by DMRG in the future, operations impacts of the modification will continue to be performed by the team responsible for the modification.

CMCE NUMBER  
CMCE-95-033

Commitment Number: 26725  
Revision x

Source Document (Level 0): TXX-94042

**Original Commitment Criteria (Overview):**

The commitment allowed for only a bolt replacement (higher tensile strength) if the original bolt was found broken.

**Revised Commitment Description (From CMCE):**

All of the other safety-related gravity dampers subject to this condition are being inspected to assure that other broken bolts do not exist. If broken bolts are identified during the inspections, the bolts will be replaced with higher strength bolts, or the blades will be welded to the shafts.

**Justification for Change ( This is to include any identified rationales and conclusions noted in the CMCE):**

Welding the blades to the shafts is equivalent to, or stronger than, using high strength bolts alone to fasten the damper blades to the shafts. Therefore, this is an acceptable alternate method of attachment. The change will not impair the ability of the safety-related dampers to perform their intended function.