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Ref. # 10CFR50.34(b)  
10CFR50.49

William J. Cahill, Jr.  
Group Vice President

December 11, 1992

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  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI)  
ON FINAL SAFETY ANALYSIS REPORT (FSAR) CHAPTER 3.11-  
CPSES ENVIRONMENTAL QUALIFICATION (EQ) PROGRAM

REF: Supplement No. 25 to NUREG-0797 dated September 17, 1992,  
related to operation of the Comanche Peak Steam  
Electric Station Unit 2

Gentlemen:

In the referenced supplement to the Safety Evaluation Report (SER), the Nuclear Regulatory Commission (NRC) identified a number of outstanding issues (OI) under review. The NRC also stated in the referenced supplement to the SER that the staff will complete the review of these items prior to issuance of Unit 2 operating license and document the review in future supplements to the SER. The outstanding issues in the reference included OI (5) on Mild Environmental Qualification (EQ) and completion of evaluation of changes to the previously approved EQ program.

On October 19, 1992, during a telephone conference call between TU Electric and the NRC, Mr. Brian Holian from Nuclear Reactor Regulation (NRR) requested additional information pertaining to the outstanding issue OI (5). The NRC questions are identified in the attachment.

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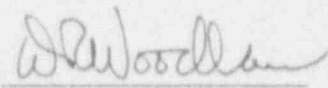
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TU Electric provides responses to the NRC questions in the attachment to this letter. If you have any questions or require further information, please contact Mr. Jacob M. Kulangara at (214) 812-8818.

Sincerely,

William J. Cahill, Jr.

By:   
D. R. Woodlan  
Docket Licensing Manager

JMK/grp  
Attachment

c - Mr. J. L. Milioan, Region IV  
Mr. B. E. Horian, NRR  
Mr. T. A. Bergman, NRR  
Resident Inspectors, CPSES (2)

NRC QUESTION 1

What are Procurement Documents and how are they equivalent to Design Purchase Specifications for Environmental Qualification Purposes? Do they contain a description of functional requirements for the specified environmental zone during normal and abnormal operating conditions?

TU ELECTRIC RESPONSE 1

Procurement Documents include all documents which result in an acquisition of an item and/or service in accordance with ANSI N18.7-1976. Technical and Quality Assurance requirements are included directly, by reference, or by replacement-in-kind. Replacement items are controlled in accordance with ANSI N18.7 (Reference FSAR Sections 17.2.4 and 17.2.7 and Appendix 1A(B), RG 1.33).

Design Purchase Specifications were used in the original procurement of major plant components.

The functional requirements for environmental qualification purposes (mild or harsh) are contained in design documents utilized in the review, evaluation and approval of procurement documents.

NRC QUESTION 2

Explain continued compliance with 10 CFR 50.49 for equipment reclassified as being in a mild environment when humidity is the only harsh environment parameter.

TU ELECTRIC RESPONSE 2

CPSES Final Safety Analysis Report (FSAR) Section 3.11B.1 defines a potentially harsh environment as an environment where safety-related equipment would experience, due to the direct effects of a design basis accident any of the parameters identified in this section of the FSAR which includes a relative humidity value of 100 percent. FSAR also states that if relative humidity is the only harsh environment parameter exceeded for an area and an evaluation concludes that the subject equipment can perform its safety-related functions when exposed to the postulated relative humidity environment, then, for purposes of environmental qualification, the equipment will be considered to be located in a mild environment.

Regarding compliance with 10 CFR 50.49 for equipment reclassified as being located in a mild environment by the above evaluation, a permanent record of such evaluation will be maintained for the life of the plant as required by

10 CFR 50.49(j). The recommendations of Regulatory Guide 1.89 need not be applied to Class 1E equipment located in a mild environment area as supported by the statements of consideration for 10 CFR 50.49 and stated in FSAR sections 1A(N) and 1A(B).

For equipment in harsh relative humidity (RH) only environment, if the evaluation does not conclude that the equipment can perform it's safety function when exposed to 100 percent RH environment, then environmental qualification is established in compliance with the requirements of 10 CFR 50.49 for that particular equipment.