



Log # TXX-93011
File # 914.2
10010
Ref. # 10CFR50.34(b)

January 8, 1993

William J. Cahill, Jr.
Group Vice President

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - Unit 2
DOCKET NO. 50-446
DEFERRAL OF PRE-OPERATIONAL TESTING

REF: TU Electric letter logged TXX-92586 from William J. Cahill, Jr.
to the U.S.N.R.C dated December 23, 1992

Gentlemen:

Per the telephone conversation between the NRC and TU Electric on January 6, 1993, TU Electric hereby provides a revised description of the pre-operational/acceptance testing to be deferred past fuel load. These revised lists supersede the information provided in the referenced letter.

A revised list has been provided of pre-operational/acceptance testing to be deferred past fuel load (see Attachment 1 - POST FUEL LOAD DEFERRED TESTING). In addition, a revised list has also been provided for the portion of the pre-operational/acceptance testing that will require retesting to be deferred past fuel load (see Attachment 2 - POST FUEL LOAD DEFERRED RETESTING). The schedule for performing the deferred testing/retesting ensures that systems required to prevent, limit, or mitigate the consequences of postulated accidents will be tested prior to the systems being required operable and ensures that the safety of the plant will not be dependent on the performance of untested systems, structures, and components.

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400 N. Olive Street L.B. 81 Dallas, Texas 75201

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No additional deferrals are anticipated at this time. However, upon completion of the review and approval of remaining test results by the Joint Test Group (JTG) prior to fuel load, additional modifications to these lists, if any, will be provided.

Sincerely,

William J. Cahill, Jr.

William J. Cahill, Jr.

By: *Roger D. Walker*

Roger D. Walker
Manager of Regulatory
Affairs for NEO

RSB/
Attachments

c- Mr. J. L. Milhoan, Region IV
Resident Inspectors, CPSES (2)
Mr. B. E. Holian, NRR

POST FUEL LOAD DEFERRED TESTING

1. Mixed Bed Demineralizers

Verify proper flow to the mixed bed demineralizers and determine delta P and effectiveness of the demineralizers and filters.

Delta P test across one of the three mixed bed demineralizers could not be performed due to potential contamination of that demineralizer. Normal operating pressure (NOP) and expansion of the radiologically controlled area (RCA) to include Unit 2 are required. This mixed bed demineralizer is not required for safe operation of the plant. However, testing is scheduled to be complete prior to entry into Mode 2.

2. Boron Thermal Regeneration System - Loaded Chiller Testing

Verify flows to and from thermal regeneration demineralizers and the piping vibration response.

Demineralizer delta P measurements could not be taken due to potential contamination problems. NOP and RCA expansion to include Unit 2 are required. This system is a non-safety related system which TU Electric has no immediate plans for making operable. This system will be tested prior to utilizing the system for its intended purpose at which time the lines will also be looked at for vibration response.

3. Extraction Steam to Auxiliary Steam System

Monitor the Unit 2 extraction steam piping to Auxiliary Steam System for thermal expansion.

Extraction steam piping did not reach normal operating temperature (NOT) during Hot Function Testing (HFT). NOT is required. This line serves no safety-related function. Testing is scheduled to be complete prior to commercial operation.

4. Communication Systems

Demonstrate that the Public Address and Emergency Evacuation Alarm System are audible during the highest expected ambient noise levels.

Evacuation Alarm Test and Audibility of Gastronics System have not been completed. The system will have been verified functional prior to fuel load. Completion of testing requires normal operating background noise. Testing will commence as soon as practical and will be completed prior to entry into Mode 2.

5. Fuel Pool Cooling and Cleanup System

Verify proper actuation and operation of the pump in the spent fuel pool skimmer loop and verify correct flows in the loop.

The reactor cavity skimmer pump can not be tested for flow until the reactor cavity is flooded. This pump is rated non-nuclear safety and is not needed until the first refueling outage. The flow-rate of the pump will be verified during the first refueling outage.

6. Steam Dump Valves

Demonstrate the proper operation of the steam dump valves.

Steam dump valves did not operate properly during HFT. Valves have been reworked and the remaining testing requires secondary system steam. These valves serve no safety-related function. Valve stroke time testing is scheduled to be performed prior to entry into Mode 2.

7. Reactor Cavity Humidity Detectors

Demonstrate the proper operation of the humidity detectors and associated annunciators.

The replacements for the defective detectors were not available for testing while the reactor vessel head was installed during HFT. They will be installed after the reactor head is in place after fuel load. These detectors serve no safety-related function. Testing is scheduled to be complete prior to entry into Mode 2.

POST FUEL LOAD DEFERRED RETESTING

1. Power Operated Relief Valves (PORV) Leak Tightness

Demonstrate leak tightness of PORVs.

PORVs leaked during Hot Functional Testing (HFT). The valves have been modified to install spacer rings in accordance with a Westinghouse Field Change notice to correct the leakage problem. NOP and NOT are required to retest the valves. Retesting is required to be completed prior to entry into Mode 2 (Technical Specification 3.4.4 applies).

2. Pressurizer Spray Valve Leakage

Demonstrate leak rate of pressurizer spray valve.

Pressurizer spray valve leaked higher than expected during HFT. Valve has been reworked; NOP and NOT are required to retest the valve. Retesting is scheduled to be complete prior to entry into Mode 2.

3. Sampling off Moisture Separator Reheaters (MSRs)

Demonstrate ability to draw samples from MSRs.

Design modifications have been made to the moisture separator portion of the secondary sampling system. Secondary plant systems must be hot in order to retest. This sampling equipment serves no safety-related function. Testing is scheduled to be complete prior to commercial operation.

4. Main Steam Isolation Valve Test

Verify the proper stroke time for Main Steam Isolation Valve.

Pre-operational test data was inconclusive in demonstrating proper stroke time for one main steam isolation valve due to measuring and test equipment problems. NOP and NOT are required to retest the valve. Retesting will be performed expeditiously in Mode 3 when conditions permit. Retesting is required to be complete prior to entry into Mode 2 to satisfy Technical Specifications 4.3.2.2 and 4.7.1.5.