

TEXAS UTILITIES GENERATING COMPANY

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Log # TXX-4479
File # 10010
910.3

May 17, 1985

JOHN W. BECK
VICE PRESIDENT

Director of Nuclear Reactor Regulation
Attention: Mr. Vincent S. Noonan, Director
Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
REQUEST FOR CHANGE TO CPSES TECHNICAL
SPECIFICATIONS CONCERNING REPLACEMENT
OF MSIV BYPASS VALVE ACTUATORS

Dear Mr. Noonan:

The Main Steam Isolation Valves (MSIV) at CPSES are equipped with four-inch bypass valves. The bypass valves are used to warm up the steam piping and equalize the pressure across the MSIV's during plant startup.

The bypass valve hydraulic actuators currently installed at the plant have required extensive maintenance and repair work for reliable operation. TUGCO proposes to replace the automatic (hydraulic) actuators with manual operators in order to eliminate the potential for problems during plant operation.

General Design Criterion 57, "Closed System Isolation Valves," permits the use of locked closed manual valves for containment isolation. The CPSES Technical Specifications currently require containment integrity during Operational Modes 1, 2, 3, and 4. However, the operation of the MSIV bypass valves is required during Modes 2, 3, 4 (Startup, Hot Standby, and Hot Shutdown). TUGCO has determined that manual operation of these valves during Modes 2, 3 and 4 will not significantly increase the potential for radioactive releases for postulated accidents requiring containment isolation. This is based on:

1. Lack of credible accident scenarios requiring containment isolation where MSIV bypass valves could significantly affect releases.
2. Downstream valves (i.e., Turbine Stop valves, Auxiliary Feed Pump Turbine Steam Stop valves, Steam Dump valves and Steam Drain System) are closed, or are capable of remote manual closure in any containment isolation event.
3. MSIV bypass valves are open for only a short time during each operating cycle. They will be locked closed during mode 1 (power operation).

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4. MSIV bypass valves can be manually closed when required to establish containment integrity.

In addition, TUGCO proposes to establish certain operating restrictions on the use of the MSIV bypass valves. These restrictions are intended to eliminate the potential for the uncontrolled blowdown of more than one steam generator in the unlikely event of a main steam line break coincident with the short period of time in which a bypass valve may be open. The operational constraints (to be incorporated in the CPSES Plant Operating Procedures) would confine operations to only one bypass valve and include the following steps:

- Open only one MSIV bypass valve and use it to equalize the pressure across the corresponding MSIV.
- Open the MSIV associated with the open bypass valve.
- Close the bypass valve.
- Open the remaining MSIVs.

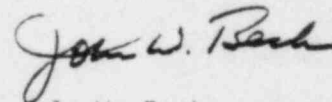
TUGCO has performed an evaluation of the impact of the MSIV bypass valve actuator replacement on plant safety. We have determined that the modification of the bypass valves and their operation with the above specified operational constraints would have no adverse impact on safety or the safety analyses presented in the CPSES FSAR.

Changes to CPSES Technical Specifications are requested as shown in Attachment 1.

Marked up copies of the FSAR Sections showing the changes resulting from the bypass valve actuator replacement are also enclosed (Attachment 2). These changes will be incorporated in a future FSAR amendment.

Should you have any questions or need clarifications, please contact us.

Sincerely,



J. W. Beck

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Attachment

Distribution: Original plus 40 copies

c - S. B. Burwell
A. L. Vietti