



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 01 1985

Docket Nos.: 50-445
and 50-446

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive St., L. B. 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Safety Evaluation Report Concerning Comanche Peak Steam Electric
Station Emergency Response Capability Conformance with Regulatory
Guide 1.97, Revision 2

References: (1) NRC letter (Youngblood to Spence) dated
November 15, 1984
(2) TUGCO letter TXX-4382 (Beck to Youngblood)
dated January 28, 1985

Reference (1) provided an interim evaluation by the NRC staff on the compliance of the Comanche Peak Steam Electric Station (CPSES) design with the guidance provided in Regulatory Guide 1.97, Revision 2. Reference (2) provided additional information in response to the exceptions from the guidance of Regulatory Guide 1.97, Revision 2 identified in the conclusions of the interim evaluation.

The enclosed draft safety evaluation with its attachment supersedes the interim evaluation and addresses the additional information provided in Reference 2. The draft safety evaluation finds the instrumentation provided either conforms to, or is justified in deviating from, the guidance of Regulatory Guide 1.97 for each post-accident monitoring variable except for neutron flux. For this variable, TUGCO has not identified the appropriate environmental qualification.

10 CFR 50.49 requires that all Regulatory Guide 1.97, Category 1 and 2 instruments located in a harsh environment be included in the environmental qualification program unless adequate justification is provided. The justification provided supporting the lack of environmental qualification for the neutron flux instrumentation stated that the same information can be obtained by monitoring the reactor coolant system (RCS) hot leg and cold leg water temperatures, and as

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backup, the control rod position and RCS soluble boron concentration. The staff has reviewed this justification and finds it is not acceptable. The alternate instrumentation cited does not provide the necessary information required for post-accident monitoring in accordance with Regulatory Guide 1.97. Category 1 neutron flux instrumentation must be provided prior to fuel loading.

Please advise Mr. S. B. Burwell, of my staff, when we may expect to receive your response to this issue. If there are any questions, Mr. Burwell will schedule conference calls with the staff.

Sincerely,

ORIGINAL SIGNED BY:

Vincent S. Noonan, Director
for Comanche Peak Project
Division of Licensing

Enclosure: As stated

cc: See next page

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Mr. M. D. Spence
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Comanche Peak Steam Electric Station
Units 1 and 2

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