TU ELECTRIC

Log # TXX-93093
File # 10010

February 18, 1993

William J. Cahill, Jr.
*Group Vice President*

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445/50-446
SELF-ASSESSMENT FOR POWER OPERATION
ABOVE 5% AND ABOVE 50%

Gentlemen:

TU Electric has developed Unit 2 assessment plans which will provide management with a basis for the decision on when to proceed to power above 5% and above 50%. Elements of the plan include a self-assessment by each line organizaion, assessments by overview groups, a review of performance indicators and comparison of Unit 2 performance to similar plants. An overview of these plans is provided for your information in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

JHG/ds

c - Mr. J. L. Milhoan, Region IV
Mr. L. A. Yandell, Region IV
Mr. T. P. Gwynn, Region IV
Resident Inspectors, CPSES (2)

220060





D029
1/1

## I. INTRODUCTION

As part of an overall program to assure the initial startup of CPSES Unit 2 is conducted safely, TU Electric is utilizing existing performance indicators in combination with additional self-assessments. This information will be consolidated in a report to provide TU Electric management with a basis for the decision on when to proceed above 5% power, and later, to proceed above 50% power.

The purpose of the assessment process is to demonstrate programs currently in place at CPSES are effective in controlling dual unit operation. In addition, due to the special requirements and conditions inherent in an initial startup program, these processes will be supplemented by special assessments to assure our readiness to proceed above 5% and 50% power and operate both units safely and effectively.

The self-assessments are being performed by line function departments such as Operations, Maintenance and Engineering and are being supplemented by assessments from organizations with an overview role such as the Independent Safety Engineering Group (ISEG), Quality Assurance, and Plant Analysis.

Each department has identified actions which require completion prior to proceeding with power ascension beyond 5% and 50% power. For each identified action, the responsible department has developed and documented criteria for completion and evaluation. As activities are completed, the responsible department representatives will sign off for each action identified on the readiness document signifying the completion criteria have been met. The self-assessments will be reviewed and evaluated by the Station Operations Review Committee (SORC) with final approval by the Vice President of Nuclear Operations prior to proceeding above the applicable power level.

A general description of some of the key elements of the self-assessment plans and independent assessments are provided below.

## II. LINE ORGANIZATION SELF-ASSESSMENTS

### A. PLANT OPERATIONS

The following areas are being evaluated as part of the assessment of Plant Operations:

1) Plant Activities - Activities and plant conditions for each unit will be evaluated to assure there is no impact to the safe operation of either Unit. This review will include operating status, Limiting Conditions of Operation (LCO's), equipment out of service, on going maintenance, and surveillances. Also, operating experience since Unit 2 fuel load will be considered to assure any lessons learned are factored into continued operational activities.

2) Plant Backlog - This evaluation will assure there are no open work backlog items (i.e., Work Orders, Engineering Technical Evaluations, ONE Forms, etc.) which could adversely impact safe and reliable operation of the plant or taken in total, could adversely impact the plant or overburden operations resources. The combined Unit 1 and Unit 2 backlog will be included in this review.

3) Configuration Control - This evaluation will assure operations personnel are fully aware of plant configuration including Temporary Modifications, Clearances, and Operating Configuration. Plant drawings and plant procedures located in the control room will be checked to provide confidence they are being maintained current.

4) Shift Operations Training - A review will be made to reassure requalification training is current and includes power ascension activities and dual unit operation aspects. This review will ensure personnel have completed a review of Unit 1 Startup lessons learned and non-routine plant evolutions.

5) Staffing - This evaluation will reassure qualified staff are filling positions and control room shift manning is being maintained in accordance with Technical Specifications. A review will be made to assure the control room staff is satisfactorily controlling in-plant operations personnel and activities. A review of use of overtime will be made to assure it is in compliance with Technical Specifications and FSAR commitments.

B. PLANT MAINTENANCE

The following areas are being evaluated as part of the assessment of plant maintenance:

1) Material Plant Condition - This evaluation will consist of plant walkdowns and a review of trend data for open work and plant housekeeping. It will assure that the maintenance program is effective in keeping the material condition of Unit 1 and Unit 2 such that there is no adverse impact on safe and reliable dual unit operation.

2) Staffing - This evaluation will reassure that qualified staff are filling required positions. The review will assure adequate staff is available to effectively support dual unit operation and that training qualifications are current to support on going maintenance requirements for both units.

C. ENGINEERING (System Engineering, Design Engineering and Maintenance Engineering)

The following areas are being evaluated for CPSES Engineering:

1) Work Activities - An evaluation will be made to assure that on-going or planned activities for System Engineering and/or Maintenance Engineering in the plant for Unit 1 or Unit 2 do not adversely impact the safe and reliable operation of either unit.

2) Backlog - This evaluation will assure that there are no open engineering backlog items which could adversely affect safe and reliable operation of the plant or taken in total, would adversely impact the plant or overburden engineering resources. For Design Engineering, particular attention will be given to open design change related documents with regard to plant impact. The review will assure the combined backlog for Unit 1 and Unit 2 does not exceed station expectations.

3) Transition - This evaluation will assure that prior to exceeding 5% power, the engineering reorganization and transition to support operation of Unit 1 and Unit 2 is complete to the extent that all tasks have been assigned and are being effectively handled. This review is also designed to assure controls are in place to preclude errors due to missed responsibilities or commitments.

4) Staffing - This evaluation will reassure that adequate staffing of qualified personnel are available to support Plant Operation and Unit 2 Initial Startup. For System Engineering and Maintenance Engineering, particular attention will be given to on-going workload since their activities more directly impact the day-to-day operation of the plant. For Maintenance Engineering, a review will assure that personnel involved in the initial Startup Test Program are trained and qualified for continued test program activities.

D. LICENSING/COMPLIANCE

The following areas are being evaluated as part of the assessment of Licensing/Compliance:

1) Commitment Review - An evaluation will be made to assure the commitment status is current and that regulatory commitments are being tracked and resolved in a timely manner.

2) Reportable Items - This evaluation will include a review of the number and nature of Unit 2 ESF actuations, reactor trips and other Licensee Event Reports. A comparison of this information will be made to Unit 1 and other similar plant second unit initial startup performance as an indication of Unit 2 performance.

3) Staffing - This evaluation will reassure that Licensing is sufficiently staffed to support dual unit activities.

E. PLANT SUPPORT (Security, Fire Protection, and Industrial Safety)

The following areas are being evaluated as part of the assessment of Plant Support:

1) Performance Indicators - This evaluation will include a review of the number and nature of security violations, fire protection impairments, and injury reports to discern the impact of dual unit operation on security, fire protection and industrial safety.

2) Staffing - This evaluation will provide reassurance that the Plant Support Organization is sufficiently staffed to support dual unit activities with qualified personnel. Attention will be devoted to assure the transition of daily routines for security and fire protection personnel to dual unit operation has been effective.

F. WORK CONTROL

The following areas are being evaluated as part of the assessment of Work Control:

1) Backlog - This evaluation will assure that the amount of open maintenance does not exceed station expectations. This review will consider the number and nature of open work for Unit 1 as well as Unit 2 so that backlog does not create an adverse impact to the safe operation of either unit. Also trend data will be reviewed to identify problem areas which need to be corrected prior to proceeding.

2) Scheduling - This evaluation will provide confidence that the scheduling process continues to be effective in coordinating and tracking open work activities on a daily basis for both units.

3) Staffing - This evaluation will reassure that qualified staff are filling required positions. The review will assure adequate staff is available to effectively support dual unit operation and that training qualifications are current to support on-going requirements for both units.

G. CHEMISTRY

The following areas are being evaluated as part of the assessment of Chemistry:

1) Work Load - This evaluation will provide assurance that the chemistry staff is able to continue timely support in obtaining and analyzing samples as required for dual unit operation coincident with initial startup test requirements.

2) Staffing - This evaluation will reassure that qualified staff are filling required positions. This review will also assure appropriate personnel are familiar with the Initial Startup Test program. The review will assure adequate staff is available to effectively support dual unit operation and that training qualifications are current to support on-going activities for both units.

H. RADIATION PROTECTION

The following areas are being evaluated as part of the assessment of Radiation Protection:

1) Radiological Controls - This evaluation will assure that the ability to conduct surveillances, control access, verify shielding and control radiological work activities is satisfactory for continued Unit 2 power ascension activities coincident with Unit 1 operation.

2) Radioactive Waste Processing - This evaluation will provide assurance that the increase in radioactive effluents produced by dual unit operation does not impair the safe processing and handling of radioactive wastes.

3) Staffing - This evaluation will reassure that qualified staff are filling required positions. The review will assure adequate staff is available to effectively support dual unit operation and that training qualifications are current to support on-going Radiation Protection requirements for both units.

I. REACTOR ENGINEERING

The following area is being evaluated as part of the assessment of Reactor Engineering:

1) Staffing - This evaluation will assure the Reactor Engineering staff is continuing to provide adequate support to the Initial Test program.

III. INDEPENDENT ASSESSMENTS

A. ISEG - Initial Startup (ISU) Surveillance Program

The ISEG - ISU Surveillance program provides a comprehensive overview of plant activities associated with the Power Ascension Test program. Coverage is intended to be provided seven days a week with a two man surveillance team on duty at all times. Teams are designed to include both Operational and Startup test experience.

Surveillance verification of Initial Startup test activities will be performed during each ISU test to provide reasonable assurance testing is conducted in accordance with the approved ISU test program, problem areas are identified and resolved in a timely manner, and test objectives are achieved effectively. Notification points are assigned in test procedures so that the responsible surveillance team will be afforded the opportunity to observe preselected test attributes. Although the focus of ISEG-ISU Surveillance will be on achieving test objectives, surveillance guidelines include observations of associated

operating procedure compliance as well as observing the effectiveness and coordination with other work groups. It is worthy to note that these surveillance personnel also have the authority to recommend to the Shift Supervisor or Senior TU Management that activities be stopped if they deem that course appropriate for plant safety.

This surveillance information is documented daily and reported weekly. This information will be used as part of the assessment information and included with the report to SORC and the Vice President of Nuclear Operations.

B. RISK ASSESSMENT

An assessment team with members from the Independent Safety Engineering Group and Plant Analysis conducted a review of the Initial Startup (ISU) schedule to determine if planned activities could adversely impact Unit 1 operation.

The team's evaluation of planned activities covered important aspects of two unit operation such as various plant conditions in each unit, Technical Specification requirements, safety functions supported by common systems, normal or expected alignments, planned surveillances affecting availability and procedural or administrative controls over interfaces and crossties.

From this review, the team concluded that planned ISU activities would not adversely impact Unit 1 operation. With particular attention to activities from fuel load through 5% power, the team determined that safety functions could be maintained available and plant conditions could be established to support Unit 2 testing while Unit 1 is operating.

ISEG will conduct ongoing reviews of the Unit 2 ISU to evaluate changes in major activities and sequences from those already reviewed by ISEG. Emerging work and implementation of administrative controls applicable to unit interfaces will be assessed as appropriate on an ongoing basis. The intent of these reviews will be to determine potential impact to Unit 1 and maintaining availability of safety systems for Unit 2. At the 50% plateau, the team will ascertain whether Unit 2 results have been satisfactorily considered with respect to continuation of testing. The results of these reviews will be provided to management on an ongoing basis and subsequently documented.

C. QUALITY ASSURANCE/QUALITY CONTROL

The assessment in this area is focusing on quality control trend information. This information provides excellent insight in many areas, including compliance with procedures, attention to detail, self-verification and professionalism. In addition, an audit of the Initial Startup Test program will be performed after 5% power. The results of this audit will be included in the assessment prior to proceeding above 50% power.

D. PLANT ANALYSIS

The evaluation in this area consists of an evaluation of applicable Industry Operating Experience Reports (IOER's) and deficiency document trend data to determine if any issues affect the ability of the plant to safely transition from one to two unit full power operation. New and open IOER data will be reviewed for new or changed information relevant to two unit operation. The trend data base will be assessed to identify emergent trends, such as personnel errors, which may be indicative of problems arising from the transition to dual unit operation. This information will be provided to management as part of the overall self-assessment process.

IV. CONCLUSION

TU Electric believes this plan is thorough, comprehensive, and broad in scope. It reflects evaluations by a broad cross section of CPSES personnel. It utilizes existing performance and evaluation programs as well as assessment criteria developed specifically for this purpose. TU Electric is confident that this plan will provide sufficient information as a basis for the decision to safely proceed beyond 5% power and later, 50% power.