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January 31, 1997

C. Lance Terry
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
UNIT 1/UNIT 2 INSERVICE TESTING PLAN FOR
PUMPS AND VALVES, REVISION 8
(1989 EDITION OF ASME CODE, SECTION IX, NO ADDENDA;
UNIT 1 INTERVAL START DATE: AUGUST 13, 1990, FIRST INTERVAL;
UNIT 2 INTERVAL START DATE: AUGUST 3, 1993, FIRST INTERVAL)

Gentlemen:

Enclosed is Revision 8 to the Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 Inservice Testing Plan (IST) for Pumps and Valves in the first interval. The Plan is a combined Unit 1/Unit 2 Plan, implementing the same requirements from the ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition of Section XI (No Addenda) on Units 1 and 2. The effective date of this revision was January 31, 1997, at 11:01 PM CST.

The attachment provides a detailed description of the changes made by Revision 8 to the Plan in a format identical to that provided for changes to the Final Safety Analysis Report (FSAR). All changes described in the attachment have been evaluated for relative significance (i.e., the group number 1, 2, 3 or 4 corresponds to each change justification as discussed in TU Electric letter TXX-88467 dated June 1, 1988). In addition, all changes applicable to CPSES Units 1 and 2 have been reviewed under the TU Electric 10CFR50.59 process and found not to include any "unreviewed safety questions."

This transmittal does not contain a request for relief from ASME Code Requirements and is provided to update your manual.

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If you have any questions, please call Mr. Carl Corbin at (817) 897-0121.

Sincerely,

C. Lance Terry

C. Lance Terry

By: *Roger D. Walker*

Roger D. Walker
Regulatory Affairs Manager

CBC
Attachment
Enclosure

c - Mr. L. J. Callan, Region IV
Mr. J. I. Tapia, Region IV
Resident Inspectors, CPSES
Mr. T. J. Polich, NRR
Mr. G. Bynog, TDLR (clo)
Mr. J. C. Hair, Authorized Nuclear Inservice Inspector

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Page 1

Adds text to Section 3.2, "Scope" stating that ASME Code Class 2 and 3 pressure relief devices that only protect systems / components that perform a safety function as described above are not tabulated in FSAR Tables 3.9N-10 and 3.9B-10, but have been included in this testing plan under Revision 8. The relief valves added by Revision 8 will be tested over the required test interval of 10 years commencing upon the issuance of Revision 8.

Revision

Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.

Change Request Number IT - 96 - 3 . 10

Related SER : 3.9.6 SSER : 26 App. R

SER/SSER Impact Y

See Change Request Number IT-96-3.1

TABLE 1-

2 Pages 11 and 12

Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) perform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.

Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.

Revision

Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.

Change Request Number IT - 96 - 3 . 1

Related SER : 3.9.6 SSER : 26 App. R

SER/SSER Impact Y

The Unit 1 Plan was approved in an NRC letter dated January 29, 1993, in which it was stated that:

"The Licensee has indicated that the valve inservice testing meets the requirements of OM-10...., and that safety and relief valve testing is conducted in accordance with OM-1-1987. The scope statement in Section 3.2 of the IST program for safety and relief valves does not appear to be consistent with all Class 1, 2, and 3 valves that provide overpressure protection; however, the applicable valves are included in the program."

The Unit 2 IST Plan was approved in SSER-26 in February 1993 which stated in part:

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"The 1989 Edition of ASME Section XI references Operations and Maintenance (OM) Standards, Parts 6 and 10, 1988 Addenda, for the rules of inservice testing of pumps and valves. Additionally, when using OM-10 for inservice testing requirements, OM-1-1987 must be used for safety and relief valves testing (not OM-1-1981). The scope of the safety and relief valves includes Class 1, 2 or 3 valves which provide a specific function in shutting down the reactor or mitigating the consequences of an accident, as first stipulated incorporates these requirements."

TU Electric provided additional clarification (TXX-93237 of July 1, 1993) on the method for determining the scope of the IST program for relief valves, and stated in part:

"ASME/ANSI OM Part 1 provides requirements for pressure relief devices which are required to perform a specific function in shutting down a reactor or in mitigating the consequences of an accident. Consistent with ASME/ANSI OM-1987 interpretation No. 1-2 and the FSAR active component classification methodology described above, the CPSES IST Program scope includes those pressure relief devices which themselves perform an active nuclear safety function. TU Electric notes that the referenced NRC safety evaluation for CPSES Unit 2 reflects this position (page 2 of Reference 3). The discussion of IST Program scope in the Unit 1 safety evaluation should be clarified to reflect this position."

TU Electric is in compliance with the code of record (1989 Edition No Addenda to ASME Section XI). However, inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.

TABLE 2-

2 Pages 10, 11 and 13

Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) perform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.

Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.

Revision

Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.

Change Request Number

IT - 96 - 3 . 2

Related SER : 3.9.6

SSER : 26 App. R

SER/SSER Impact

Y

See Change Request Number IT-96-3.1

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TABLE 3-

2 Pages 1 and 2

Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) preform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.

Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.

Revision

Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.

Change Request Number IT - 96 - 3 . 3

Related SER : 3.9.6 SSER : 26 App. R

SER/SSER Impact Y

See Change Request Number IT-96-3.1

TABLE 4-

2 Pages 12 and 16

Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) perform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.

Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.

Revision

Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.

Change Request Number IT - 96 - 3 . 4

Related SER : 3.9.6 SSER : 26 App. R

SER/SSER Impact Y

See Change Request Number IT-96-3.1

TABLE 5-

2 Pages 6 and 7

Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) preform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.

Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.

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	Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.
Change Request Number	IT - 96 - 3 . 5
Related SER : 3.9.6	SSER : 26 App. R
SER/SSER Impact	Y
See Change Request Number IT-96-3.1	

TABLE 7-

2	Pages 5 and 6
	Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) preform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.
	Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.
	Revision
	Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.
	Change Request Number IT - 96 - 3 . 6
	Related SER : 3.9.6 SSER : 26 App. R
	SER/SSER Impact Y
	See Change Request Number IT-96-3.1

TABLE 11-

2	Pages 4 and 5
	Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) preform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.
	Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.
	Revision
	Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.
	Change Request Number IT - 96 - 3 . 7
	Related SER : 3.9.6 SSER : 26 App. R
	SER/SSER Impact Y
	See Change Request Number IT-96-3.1

TABLE 13-

2	Pages 18, 19, and 23
	Include ASME Code Class 2 and 3 relief valves that protect systems /

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	<p>components that 1) preform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.</p> <p>Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.</p> <p>Revision</p> <p>Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.</p> <p>Change Request Number IT - 96 - 3 . 8</p> <p>Related SER : 3.9.6 SSER : 26 App. R</p> <p>SER/SSER Impact Y</p> <p>See Change Request Number IT-96-3.1</p>

TABLE 14-

2	<p>Pages 4 and 5</p> <p>Include ASME Code Class 2 and 3 relief valves that protect systems / components that 1) preform a specific function in shutting down the reactor to the safe shutdown condition, 2) maintain the safe shutdown condition, or 3) mitigate the consequences of an accident.</p> <p>Also adds note at end of Table which states that the relief valves do not perform a specific safety function but protect systems / components that perform a specific safety function.</p> <p>Revision</p> <p>Inclusion of these relief valves brings the IST Plan into compliance with the current NRC/ASME philosophy on the scope of relief valves required in the IST Plan.</p> <p>Change Request Number IT - 96 - 3 . 9</p> <p>Related SER : 3.9.6 SSER : 26 App. R</p> <p>SER/SSER Impact Y</p> <p>See Change Request Number IT-96-3.1</p>
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ENCLOSURE TO TXX-97023

COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 & 2
INSERVICE TESTING PLAN (IST)
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The following instructional information and checklist is being furnished to help insert Revision 8 into the Comanche Peak Steam Electric Station IST.

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NOTE: Please complete the entry for insertion of Revision 8 on the "Record of Changes" form located at the beginning of the IST Plan.