

**TEXAS UTILITIES GENERATING COMPANY**  
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WILLIAM G. COUNSIL  
EXECUTIVE VICE PRESIDENT

December 16, 1985

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
TMI ACTION ITEMS I.C.1 AND I.D.1  
EMERGENCY RESPONSE GUIDELINE TASK  
ANALYSIS

- REF: 1) CPSES Supplemental Safety Evaluation Report (SSER)  
No. 12 dated October 1985.
- 2) H. C. Schmidt letter TXX-4216 to B. J. Youngblood  
dated July 6, 1984.
- 3) H. C. Schmidt letter TXX-4285 to B. J. Youngblood  
dated August 24, 1984.
- 4) CPSES SSER No. 6 dated November 1984.

Dear Mr. Noonan:

Reference 1 provides an update to the NRC guidance for the evaluation and development of procedures for transients and accidents. The guidance specifically defines a preliminary license condition which requires the completion of the function and task analysis for CPSES prior to startup of the Unit 1 second operating cycle.

In accordance with the above license condition, a detailed functional task analysis has been performed on the CPSES Emergency Response Guideline (ERG) procedures. The process for performing this analysis is contained in the attached CPSES Procedure ODA-204, Revision 4. This procedure addresses concerns identified by the NRC review of ODA-204, Revision 3 (submitted by Reference 2). Also attached is a representative analysis documentation package for CPSES Procedure EOS-0.0, Revision 0, Rediagnosis. The analysis documentation packages for the remaining ERG procedures are available onsite.

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Review of the task analysis documentation for all CPSES ERG Procedures resulted in only minor changes to the Westinghouse Generic Procedures. The changes included:

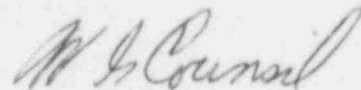
- ° Minor wording changes due to plant specific nomenclature.
- ° Minor step sequence changes that did not violate the generic step sequence.
- ° Incorporation of two or more generic steps into one plant specific step due to plant configuration.

These deviations are included in the specific data packages pertaining to the individual CPSES procedure. All of the above deviations were evaluated in detail to verify that the generic procedures were not compromised in any manner.

The Generic Plant Comparison Package was submitted by Reference 3. This document (approved in Reference 1) has since been revised to incorporate a change that was added to the plant specific procedures. The change consisted of removing the red path summary from all the generic procedure fold-out pages and inserting in its place the criteria for adverse containment. For this reason, the Generic Comparison Package, Revision 1, is attached for your review.

The NRC evaluation of the Detailed Control Room Design Review (DCRDR) is reported in Reference 4. Two of the essential elements of the DCRDR requiring resolution are the completion of a function and task analysis and the comparison of display and control requirements. These elements were encompassed by the scope of the ERG task analysis.

Very truly yours,



W. G. Council

RWH/grr  
Attachment

c - Annette Vietti-Cook