

January 12, 2000

Mr. C. Lance Terry  
Senior Vice President &  
Principal Nuclear Officer  
TXU Electric  
ATTN: Regulatory Affairs Department  
P. O. Box 1002  
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2  
RE: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-02,  
"LOSS OF REACTOR COOLANT INVENTORY AND ASSOCIATED  
POTENTIAL FOR LOSS OF EMERGENCY MITIGATION FUNCTION WHILE IN  
A SHUTDOWN CONDITION" (TAC NOS. MA4779 AND MA4780)

Dear Mr. Terry:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for Pressurized Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to draindown the reactor coolant system (RCS) to the refueling water storage tank (RWST) and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2) if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, you provided a letter dated November 23, 1998, for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The submittal indicated that CPSES, Units 1 and 2, were vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC can verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated October 20, 1999, the Region IV NRC staff issued NRC Inspection Report No. 50-445/99-15; 50-446/99-15. The subject inspection report contained details of the NRC staff's on-site verification of activities which you undertook in response to GL 98-02 for CPSES, Units 1 and 2. Specifically, the inspector verified that the licensee had effectively implemented administrative controls, configuration management, and operating procedures to preclude an inadvertent draindown event as described in GL 98-02. Valves 1/2-8717 (an RHR pump

discharge isolation valve which could provide a flow path for high temperature water from the RCS to the RWST) was locked closed in accordance with System Operating Procedure (SOP) 102A/B, "Residual Heat Removal System." The configuration management of valve position and locked component status was found to be maintained by ODA-403, "Operations Department Locked Component Control," and OWI-103, "Locked Component Listing and Deviation Controls." In addition to the locking device, valves 1/2-8717 are labeled with a red tag that states, as required by OWI-103, the shift manager should be contacted prior to removing the lock or operating the valve. Operator training on the event was conducted by the licensee through their required reading lessons learned program. The above measures were found by the inspector to be appropriate.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for CPSES, Units 1 and 2; therefore, we consider GL 98-02 to be closed for CPSES, Units 1 and 2.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager  
Project Directorate IV & Decommissioning, Section 1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

cc: See next page

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Sincerely,

/RA/

David H. Jaffe, Senior Project Manager  
 Project Directorate IV & Decommissioning, Section 1  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

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Comanche Peak Steam Electric Station

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