TXU Electric
Comanche Peak
Steam Electric Station
P.O. Box 1002
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lterry1@txu.com

C. Lance Terry
Senior Vice President & Principal Nuclear Officer

TXX-00049
File # 10200
Ref. # 10CFR50.73(a)(2)(i)(B)

February 22, 2000

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT1
DOCKET NO. 50-445
CONDITIONS PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 445/00-001-00

REF: 1) TXU Electric letter TXX-00019 from C. L. Terry to NRC, dated January 19, 2000

2) TXU Electric letter TXX-00021 from C. L. Terry to NRC, dated January 20, 2000

Enclosed is Licensee Event Report (LER) 00-001-00 for Comanche Peak Steam Electric Station Unit 1, "Technical Specifications Limiting Condition for Operation (LCO) 3.7.3, Feedwater Isolation Valves (FIVs) and Associated Bypass Valves were Exceeded."

Reference 1 and 2 are TXU Electric's letters that request the Nuclear Regulatory Commission (NRC) to exercise enforcement discretion, and to allow CPSES Unit 1 to remain in Mode 1, Power Operation, while one Feedwater Isolation Valve (FIV) is inoperable.

IE22

There are no new licensing based commitments in the communication.

Sincerely,

C. L. Terry

C. L. Terry

By: Roger D. Walker

R. D. Walker
Regulatory Affairs Manager

OAB/oab
Enclosure

cc: Mr. E. W. Merschoff, Region IV
Mr. J. I. Tapia, Region IV
Resident Inspectors, CPSES

Enclosure to TXX-00049

NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98
ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

Facility Name (1)	Docket Number (2)	Page (3)
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1	05000445	1 OF 4

Title (4)
TECHNICAL SPECIFICATIONS LIMITING CONDITION FOR OPERATION (LCO) 3.7.3, FEEDWATER ISOLATION VALVES (FIVS) AND ASSOCIATED BYPASS VALVES WERE EXCEEDED

Event Date (5)			LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Name	Docket Numbers
									CPSES UNIT 2	05000446
01	21	00	00	01	00	02	22	00		05000

Operating Mode (9)

Power Level (10)

This report is submitted pursuant to the requirements of 10 CFR : (Check one or more) (11)

20.2201 (b)	20.2203 (a) (2) (v)	X	50.73 (a) (2) (i)		50.73 (a) (2) (viii)
20.2203 (a) (1)	20.2203 (a) (3) (i)		50.73 (a) (2) (ii)		50.73 (a) (2) (x)
20.2203 (a) (2) (i)	20.2203 (a) (3) (ii)		50.73 (a) (2) (iii)		73.71
20.2203 (a) (2) (ii)	20.2203 (a) (4)		50.73 (a) (2) (iv)		OTHER
20.2203 (a) (2) (iii)	50.36 (c) (1)		50.73 (a) (2) (v)		Specify in Abstract below or in NRC Form 366A
20.2203 (a) (2) (iv)	50.36 (c) (2)		50.73 (a) (2) (vii)		

Licensee Contact For This LER (12)

Name	Telephone Number (Include Area Code)
Rafael Flores - System Engineering Manager	254-897-5590

Complete One Line For Each Component Failure Described in This Report (13)

Cause	System	Component	Manufacturer	Reportable To NPRDS	Cause	System	Component	Manufacturer	Reportable To NPRDS
				N					

Supplemental Report Expected (14)

				EXPECTED SUBMISSION DATE (15)	Month	Day	Year
	YES (If YES, complete EXPECTED SUBMISSION DATE)	X	NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On November 24, 1999, it was discovered that the hydraulic pump for 1-HV-2136, SG 1-03 Feedwater Isolation Valve (FIV 1-03), was not maintaining its prime due to air inleakage. Maintenance personnel were able to re-prime the pump on several occasions, but for long term reliability, maintenance and engineering recommended replacement of the hydraulic pump at power. The Limiting Condition for Operation (LCO) 3.7.3, Feedwater Isolation Valves (FIVs) and Associated Bypass Valves, requires, in part, that four FIVs and associated bypass valves be OPERABLE in Modes 1, 2, and 3. With one or more FIVs inoperable, the action to be taken is to close or isolate the FIV within 4 hours. Operating at power with one FIV inoperable would require a significant reduction in power or placing the unit in Mode 3, Hot Standby. TXU Electric requested that the NRC exercise enforcement discretion to not enforce compliance with LCO 3.7.3 Required Action A.1, A Close or Isolate the FIV within 4 hours, if maintenance activities to repair FIV 1-03 were to take longer than 4 hours.

This report is being issued to document that the Completion Time allowed by LCO 3.7.3, Required Action A.1, A was exceeded by 1 hour and 52 minutes. No corrective actions are warranted, since the enforcement discretion to not enforce compliance with LCO 3.7.3 was requested and granted.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

Facility Name (1)	Docket	LER Number (6)			Page(3)
		Year	Sequential Number	Revision Number	
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1	05000445	00	001	00	2 OF 4

Text (If more space is required, use additional copies of NRC Form 366A) (17)

I. DESCRIPTION OF REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION

The reportable event classification was considered to be any operation prohibited by the plant's Technical Specification (10CFR50.73(a)(2)(i)(B).

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

At time of discovery, on January 21, 2000, Comanche Peak Steam Electric Station (CPSES) Unit 1 was in Mode 1, Power Operations.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no other structures, systems or components that were inoperable contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On November 24, 1999, it was discovered that the hydraulic pump for 1-HV-2136, SG 1-03 Feedwater Isolation Valve (FIV 1-03) was not maintaining its prime due to air inleakage. Maintenance personnel were able to re-prime the pump on several occasions, but for long term reliability, maintenance and engineering recommended replacement of the hydraulic pump at power. The Limiting Condition for Operation (LCO) 3.7.3, Feedwater Isolation Valves (FIVs) and Associated Bypass Valves, requires, in part, that four FIVs and associated bypass valves be OPERABLE in Modes 1, 2, and 3. With one or more FIVs inoperable, the action to be taken is to close or isolate the FIV within 4 hours. Operating at power with one FIV inoperable would require a significant reduction in power or placing the unit in Mode 3, Hot Standby. TXU Electric requested that the NRC exercise enforcement discretion to not enforce compliance with LCO 3.7.3 Required Action A.1, A Close or isolate the FIV within 4 hours, if maintenance activities to repair FIV 1-03 were to take longer than 4 hours.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

Facility Name (1)	Docket	LER Number (6)			Page(3)
		Year	Sequential Number	Revision Number	
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1	05000445	00	001	00	3 OF 4

Text (If more space is required, use additional copies of NRC Form 366A) (17)

On January 21, 2000, the hydraulic pump was replaced. CPSES Unit 1 failed to meet the LCO 3.7.3 and failed to meet the 4-hour Completion Time of Required Action A.1, A. The actual time to replace the hydraulic pump was 5 hours and 52 minutes. This placed the plant in a condition prohibited by Plant Technical Specification and therefore is reportable pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

On January 21, 2000, during the event it was anticipated that the LCO would be exceeded.

II. COMPONENT OR SYSTEM FAILURES

A. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT

Not Applicable - No failure mode, mechanism, and effects of each component are applicable.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

Not Applicable - No safety system train inoperability was determined.

C. SAFETY CONSEQUENCES AND IMPLICATIONS

The primary safety functions of the safety grade FIVs is to isolate main feedwater flow (MFW) to the secondary side of the steam generators following a high-energy line break (HELB). Each FIV has a FIV Bypass Valve (FIBV) and a Feedwater Preheater Bypass Valve (FPBV) which are its associated bypass valves. The associated function of the Feedwater Control valves (FCVs) and their associated bypass valves (FCBVs) is to provide backup isolation of MFW flow to the secondary side break following an HELB. The FCVs and their associated bypass valves receive the same redundant isolation signals and have the same closure stroke time design requirements as the FIVs and their associated bypass valves; however, the FCVs do not meet the same safety grade requirements as the FIVs. Because the control valves are highly reliable and a seismic event is not assumed to occur coincident with a spontaneous break of safety related secondary piping, if a safety grade FIV fails to close on demand, the feedwater isolation function will be performed by the closure of the FCVs and associated bypass valves. The feedwater isolation function can also be completed through the automatic tripping of the main feedwater pumps.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

Facility Name (1)	Docket	LER Number (6)			Page(3)
		Year	Sequential Number	Revision Number	
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1	05000445	00	001	00	4 OF 4

Text (If more space is required, use additional copies of NRC Form 366A) (17)

For high-energy secondary system breaks occurring in the main steam lines or in the MFW lines downstream of the FIVs and associated bypass valves, or FCVs and associated bypass valves, the completion of the feedwater isolation function terminates the addition of feedwater to an affected steam generator, limiting the mass and energy releases for HELBs thus limiting the peak containment pressure and temperature, and reducing the RCS cooldown effects. Blowdown from a feedwater line break occurring upstream of the main feedwater check valves will be minimized by these check valves, and the resultant transient will be similar to a loss of main feedwater. These main feedwater check valves are included in the CPSES Inservice Testing Plan and are tested accordingly.

The Probabilistic Risk Assessment Group assessed the risk of performing the maintenance at power assuming the valve is unavailable to perform its intended function. Based on this assessment, it was concluded that the incremental increase in risk associated with performing the maintenance at power is not risk-significant. Thus, the risks of remaining at power while repairs are being made to FIV 1-03 is considered to be less than those associated with transition and shutdown. In addition, there is a risk of a transient occurring if the valve is not repaired. Therefore, it was concluded that to remain at power while repairs are made to FIV 1-03 did not impact the health or safety of public.

III. CAUSE OF THE EVENT

The cause of exceeding the LCO was the amount of work being performed. Which required the outage time longer than the allowed by the LCO.

VI. CORRECTIVE ACTIONS

TXU Electric was aware of the conditions, that the time to replace the hydraulic pump could potentially exceed the CPSES Technical Specification LCO. For this reason TXU Electric requested the enforcement discretion, and was granted such discretion. No further corrective actions are warranted.

V. PREVIOUS SIMILAR EVENTS

There have been other events that involve exceeding the LCO requirements. However, the causes of those events are different than this event such that the corrective actions taken for the previous events would have not precluded the subject event.