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Log # TXX-00060
File # 10035
Ref. # GL 95-07

March 24, 2000

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION(CPSES)
DOCKET NUMBERS 50-445 AND 50-446
INFORMATION REGARDING GENERIC LETTER 95-07,
"PRESSURE LOCKING AND THERMAL BINDING OF
SAFETY RELATED POWER OPERATED GATE VALVES"

REF: TXU Electric letter, logged TXX-99149, from C. L. Terry to the NRC dated June 24, 1999

Via the referenced letter (enclosed) TXU Electric provided information to the NRC with respect to how and when certain valves impacted by the Generic Letter 95-07 will be modified. Via this letter, TXU Electric wishes to update the aforementioned information.

In the referenced letter TXU Electric stated that it will modify Unit 1 and Unit 2 Residual Heat Removal (RHR) System crosstie isolation valves 1/ 2 - 8716A/B, by adding a relief valve and associated piping to the valve bonnets. Additionally, TXU Electric stated that these valves will be modified during the up coming refueling outages for both CPSES Units.

Through further analysis a refined transient thermal model indicates that the temperature increase at the valve would be much less than 40° F over the short period of Emergency Core Cooling System(ECCS) Cold Leg recirculation prior to opening the valves for Hot Leg recirculation. While there are some uncertainties in the analysis, these can be confirmed via field data collection during the next refueling

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outage for Unit 2 when the post-LOCA mode can be simulated. Since it can be shown that the expected temperature increase would be well below the originally estimated 40° F, the modification may not be necessary. Therefore, TXU Electric's current position with respect to valves 1/ 2-8716-A/B, is that thermally induced bonnet Pressure Locking is not an issue. This position will be supported by the following actions:

1) Finalization of the refined thermal model calculation documented in accordance with CPSES procedures.

2) Confirmation of calculation results provided by field temperature measurements taken at the actual valve locations during the next refueling outage during the initiation of RHR system operation.

The basis for the change in TXU Electric's position is based on; 1) the initially calculated 40° F rise in valve temperature indicated that pressure locking thermal binding was likely if the valve bonnet temperature reached a steady state maximum, and that a modification at the next refueling outage was necessary, and, 2) a refined transient analysis indicates that only a very small temperature rise is expected over the short period of ECCS Cold Leg recirculation, therefore a modification may not be required. Pushing forward with a modification that may not be required would be costly and could introduce new potential failure avenues through the added relief valves and piping. It is expected that obtaining temperature data at the next refueling outage will confirm the refined analysis that will alleviate the need to install the relief valves. The result of TXU Electric's evaluation will be made available at site, for NRC Staff review if warranted.

Should you have any questions regarding this matter, please contact Obaid Bhatty at (254) 897-5839 to coordinate this effort.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and Unit 2.

Sincerely,

C. L. Terry

C. L. Terry

By: Roger D. Walker

Roger D. Walker
Regulatory Affairs Manager

OAB/oab
Enclosure

cc: E. W. Merschoff, Region IV
J. I. Tapia, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES

ENCLOSURE TO TXX-00060

TXX-99149