

January 19, 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 99-02,  
"LABORATORY TESTING OF NUCLEAR-GRADE ACTIVATED CHARCOAL"  
(TAC NOS. MA5779 AND MA5780)

Dear Mr. Terry:

On June 3, 1999, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 99-02 to all holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

The purpose of the generic letter was to:

- (1) Alert addressees that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of General Design Criterion 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR) and Subpart A of 10 CFR Part 100.
- (2) Request that all addressees determine whether their Technical Specifications (TS) reference ASTM D3803-1989 for charcoal filter laboratory testing. Addressees whose TS do not reference ASTM D3803-1989 should either amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol and provide the information discussed in the requested actions.
- (3) Alert addressees to the staff's intent to exercise enforcement discretion under certain conditions.
- (4) Request that all addressees send the NRC written responses on the implementation of the actions requested in this generic letter.

In GL 99-02, the NRC staff established the following four groups of plants:

- (1) plants in compliance with their TS that test charcoal samples in accordance with ASTM D3803-1989

- (2) plants in compliance with their TS that test charcoal samples in accordance with a test protocol other than ASTM D3803-1989
- (3) plants not in compliance with their TS that test charcoal samples in accordance with ASTM D3803-1989
- (4) plants not in compliance with their TS that test charcoal samples in accordance with a test protocol other than ASTM D3803-1989

In response to GL 99-02, you provided a letter dated July 26, 1999, for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The July 26, 1999, submittal was supplemented by your letter dated November 8, 1999, which contained a request for a license amendment to change your TS to provide for testing of charcoal samples as described in the generic letter. The NRC staff has reviewed your letters dated July 26 and November 8, 1999, and has concluded that you have provided the requested information and a TS change request in accordance with the GL. In addition, you have committed to test charcoal samples in accordance with ASTM D3803-1989 until your TS amendment is issued. The test will be to the acceptance criterion that is derived from applying a safety factor of 2 to the charcoal filter efficiency assumed in the CPSES design-basis dose analysis. Therefore, we consider GL 99-02 to be closed for CPSES, Units 1 and 2. The TS change will be reviewed as a separate, plant-specific action under TAC Nos. MA7188 and MA7189 for CPSES, Units 1 and 2, respectively. We thank you for your prompt and complete response.

Sincerely,

*/RA/*

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

Docket Nos. 50-445 and 50-446

cc: See next page

January 19, 2000

- (2) plants in compliance with their TS that test charcoal samples in accordance with a test protocol other than ASTM D3803-1989
- (3) plants not in compliance with their TS that test charcoal samples in accordance with ASTM D3803-1989
- (4) plants not in compliance with their TS that test charcoal samples in accordance with a test protocol other than ASTM D3803-1989

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Comanche Peak Steam Electric Station

cc:

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