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Senior Vice President & Principal Nuclear Officer

Log # TXX-00010  
File # 10010  
916 (3.3)  
Ref. # 10CFR50.90

January 13, 2000

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

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)**  
**DOCKET NOS. 50-445 AND 50-446**  
**LICENSE AMENDMENT REQUEST (LAR) 99-006**  
**REVISION TO SR 3.3.1.10**

Gentlemen:

Pursuant to 10CFR50.90, TXU Electric hereby requests an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating the attached change into the CPSES Unit 1 and 2 Technical Specifications. This change request applies to both units.

The proposed change will add Note 3 to SR 3.3.1.10 to allow entry into Modes 2 or 1 without the performance of N-16 detector plateau verification until 72 hours after achieving equilibrium conditions at greater than or equal to 90% rated thermal power.

Attachment 1 is the required Affidavit. Attachment 2 provides a detailed description of the proposed change, a safety analysis of the change, and TXU Electric's determination that the proposed change does not involve a significant hazard consideration. Attachment 3 provides the affected Technical Specification page, marked-up to reflect the proposed change.

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Page 2 of 2

TXU Electric requests approval of the proposed License Amendment by September 15, 2000 and will be implemented within 30 days of the issuance of the license amendment.

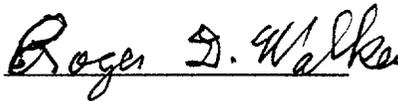
In accordance with 10CFR50.91(b), TXU Electric is providing the State of Texas with a copy of this proposed amendment.

This communication contains no new or revised commitments.

Should you have any questions, please contact Mr. Bob Dacko at (254) 897-0122.

Sincerely,

  
C. L. Terry

By: 

Roger D. Walker  
Regulatory Affairs Manager

BSD/bsd

Attachments    1. Affidavit  
                    2. Description and Assessment  
                    3. Affected Technical Specification page  
                              (marked-up page)

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

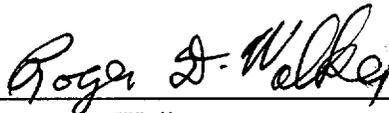
Mr. Authur C. Tate  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49th Street  
Austin, Texas 78704

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
TXU Electric Company	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric Station,	)	License Nos. NPF-87
Units 1 & 2)	)	NPF-89

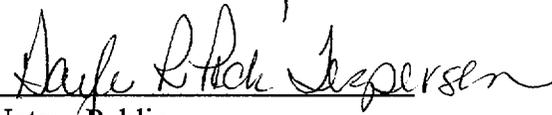
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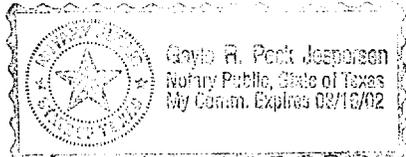
Roger D. Walker being duly sworn, hereby deposes and says that he is Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 99-006; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
 Roger D. Walker  
 Regulatory Affairs Manager

STATE OF TEXAS )  
 )  
 COUNTY OF )  
 Somervell

Subscribed and sworn to before me, on this 13<sup>th</sup> day of January, 2000.

  
 Notary Public



**ATTACHMENT 2 to TXX-00010**  
**DESCRIPTION AND ASSESSMENT**

## SIGNIFICANCE HAZARDS CONSIDERATION

### I. BACKGROUND

Prior to conversion of the CPSES Technical Specifications (TS) to the NUREG-1431 format in Amendment 64, TS Table 4.3-1, Note 5 provided a 4.0.4 exception to allow entry into Mode 1 to perform detector plateau evaluations for the Nuclear Instrumentation System (NIS) and the N-16 detectors. Because of the format of NUREG-1431 surveillances in TS Section 3.3.1, the NIS and N-16 calibrations were split into two surveillances, SR 3.3.1.10 for N-16 and 3.3.1.11 for NIS. During the conversion, the 4.0.4 exception was carried over to SR 3.3.1.11 in the form of a surveillance note allowing entry into Modes 2 or 1 without the performance of power and intermediate range detector plateau verification until 72 hours after achieving equilibrium conditions at greater than or equal to 90% rated thermal power (RTP). However, the corresponding note was inadvertently not included in SR 3.3.1.10 for N-16. It is necessary to add a note to SR 3.3.1.10 similar that provided for SR 3.3.1.11 because N-16 power plateau evaluations can only be done in Mode 1.

### II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

The proposed change would add a note to SR 3.1.1.10 to allow entry into Modes 2 or 1 without the performance of N-16 detector plateau verification until 72 hours after achieving equilibrium conditions at greater than or equal to 90% RTP.

### III. ANALYSIS

For accuracy, the N-16 power plateau evaluations are normally performed at an equilibrium power of 90% RTP or above. The failure to include a note to SR 3.3.1.10 allowing entry into the Mode required to perform the N-16 plateau evaluation was an editorial oversight during the conversion to the NUREG-1431 format. Adding this note, which is consistent with the pre-conversion technical specifications and the current CPSES licensing basis, is considered to be an administrative correction.

#### IV. SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TXU Electric has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10CFR50.92(c) as discussed below:

- 1) Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change is considered to be a correction of an editorial error. The proposed revision to SR 3.3.1.10 is consistent with the current CPSES licensing basis. Therefore the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Do the proposed changes create the possibility of a new or different kind of accident from any previously evaluated?

The proposed change is considered to be an editorial correction and does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3) Do the proposed changes involve a significant reduction in a margin of safety?

The proposed change is considered to be an editorial correction and does not involve a reduction in a margin of safety.

Based on the above evaluations, TXU Electric determined that the requested Technical Specification changes do not involve a significant increase in the probability or consequences of an accident or other adverse condition. It does not create the possibility of a new or different kind of accident or condition previously evaluated. It does not involve a reduction in the margin of safety. Therefore, the requested license amendment request does not involve a significant hazards consideration.

#### V. ENVIRONMENTAL EVALUATION

TXU Electric has evaluated the proposed change and has determined that the change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amount of effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22 (c)(9). Therefore, pursuant to 10CFR51.22 (b), an environmental assessment of the proposed change is not required.

#### VI. REFERENCES

None.

**ATTACHMENT 3 to TXX-00010**

**MARKUP OF AFFECTED TECHNICAL SPECIFICATION PAGE**

**Page 3.3-13**

SURVEILLANCE REQUIREMENTS (continued)

<p>SR 3.3.1.9 -----NOTE----- Verification of setpoint is not required. ----- Perform TADOT.</p>	<p>92 days</p>
<p>SR 3.3.1.10 -----NOTES----- 1. N-16 detectors are excluded from CHANNEL CALIBRATION.  2. This Surveillance shall include verification that the time constants are adjusted to the prescribed values.  3. Prior to entry into MODES 2 or 1, N-16 detector plateau verification is not required to be performed until 72 hours after achieving equilibrium conditions with THERMAL POWER <math>\geq</math> 90% RTP. ----- Perform CHANNEL CALIBRATION.</p>	<p>18 months</p>
<p>SR 3.3.1.11 -----NOTES----- 1. Neutron detectors are excluded from CHANNEL CALIBRATION.  2. This Surveillance shall include verification that the time constants are adjusted to the prescribed values.  3. Prior to entry into MODES 2 or 1, power and intermediate range detector plateau verification is not required to be performed until 72 hours after achieving equilibrium conditions with THERMAL POWER <math>\geq</math> 90% RTP. ----- Perform CHANNEL CALIBRATION.</p>	<p>18 months</p>
<p>SR 3.3.1.12 Not used.</p>	

(continued)