



**TXU Electric
Comanche Peak
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C. Lance Terry
Senior Vice President & Principal Nuclear Officer

Ref: 10CFR50.90
10CFR50.36

CPSES-200001318
Log # TXX-000114
File # 10010
916 (3.7)

May 30, 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
SUPPLEMENT TO LICENSE AMENDMENT REQUEST 99-007
REVISION TO VENTILATION FILTER TESTING PROGRAM
(TAC NOS. MA7188 AND MA7189)**

- REF: 1) NRC Letter from David H. Jaffe to C. Lance Terry dated
February 24, 2000
2) TXU Electric Letter, logged TXX-99231, from C. L. Terry to the
NRC dated November 8, 1999

Gentlemen:

On February 24, 2000, the NRC issued Amendment 74 to Facility Operating License No. NPF-87 and Amendment 74 to Facility Operating License No. NPF-89 for Comanche Peak Steam Electric Station, Units 1 and 2 respectively (TAC Nos MA4841 and MA4842). The amendments consisted of changes to the Technical Specifications (TSs) in response to TXU Electric letters TXX-99001 (February 11, 1999), TXX-99158 (September 3, 1999), and TXX-99247 (December 20, 1999). The Amendments changed the TSs to authorize an increase in the allowable spent fuel storage capacity and the crediting of soluble boron, in the spent fuel pool, for spent fuel reactivity control. The enclosures to Reference 1 noted the license amendments would be implemented no later than June 30, 2000 (as requested by TXU Electric letter TXX-99247, dated December 20, 1999.)

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TXU Electric has not implemented License Amendment 74.

Per Reference 2, TXU Electric submitted a request to amend the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating changes that would incorporate the guidance of NRC Generic Letter 99-02, specifically, the laboratory testing of ESF Ventillation System charcoal for CPSES Units 1 and 2.

TXU Electric is herein supplementing License Amendment Request (LAR) 99-007. Specifically, TXU Electric is requesting that the implementation date of June 30, 2000, for License Amendment 74 (Reference 1) be extended until December 31, 2000. This request is necessitated by issues which remain unresolved regarding potential non-conservatism in the associated criticality analyses for License Amendment 74. In March 2000, based on preliminary investigations, Duke Power notified the NRC/Industry of potential non-conservatisms in Westinghouse's current licensed and approved methodology regarding the axial burnup bias on spent fuel criticality analyses. A delay in the implementation date of License Amendment 74 will allow additional time for TXU Electric to address/evaluate the effect (if any) this issue will have on the spent fuel storage curves as approved by License Amendment 74.

This requested change in implementation date does not affect the changes as approved by License Amendment 74 (Reference 1).

This requested change in implementation date does not affect the proposed Technical Specification changes (LAR 99-007), the safety analysis of those changes, or the determination that the proposed changes do not involve a significant hazard consideration (provided by Attachments 2 and 3 of Reference 2).

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 licensing basis commitments regarding CPSES Units 1 and 2.



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Should you have any questions please contact Carl B. Corbin at (254) 897-0121.

Sincerely,

C. L. Terry

By: 

J. J. Kelley, Jr.
Vice President - Nuclear Engineering & Support

CBC/cbc

Attachments

Enclosures

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

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