



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

Ref: 10CFR50.36

CPSES-200001560
Log # TXX-00119
File # 10010
916 (TRM)

June 29, 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
TRANSMITTAL OF TECHNICAL REQUIREMENTS MANUAL
(TRM) REVISION 34

Gentlemen:

TXU Electric herewith submits Revision 34 (Enclosure) of the CPSES Technical Requirements Manual (TRM). Enclosed is the following document:

Technical Requirements Manual	1 signed original
Revision 34	and 10 copies

The Attachment contains a description of the changes. As has been the TU Electric practice in the past several TRM revisions, all changes described in the Attachment have been evaluated for relative significance (i.e., the group number 1, 2, 3, or 4 corresponds to each change justification as discussed in TU Electric letter TXX-88467 dated June 1, 1988). In addition, all changes applicable to CPSES Units 1 and 2 have been reviewed under the TU Electric 10CFR50.59 process and found not to include any "unreviewed safety questions".

D029



TXU Electric
P.O. Box 1002
Glen Rose, TX 76043

TXX-00119
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TRM Revision 34, dated June 29, 2000, became effective at 12:01 AM CST on June 29, 2000.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2. If you have any questions, please contact Carl Corbin at (254) 897-0121.

Sincerely,

C. L. Terry
C. L. Terry

By: *Roger D. Walker*
Roger D. Walker
Regulatory Affairs Manager

CBC/cbc

Attachment
Enclosure

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

CPSES - TECHNICAL REQUIREMENTS MANUAL
REVISION - 34
DETAILED DESCRIPTION

Prefix Page
(as amended)
13.3- 2

Page 4

<u>Group</u>	<u>Description</u>
2	Clarifies Note 2 for Item 6 (Overtemperature N-16) of Table 13.3.1-1, "Reactor Trip System (RTS) Instrumentation Response Time Limits," to explicitly state that the maximum allowed RTD/thermal well response time for overtemperature reactor trip function is 6 seconds.

Clarification

The overall response time limit for the overtemperature N-16 reactor trip function is 8 seconds, as noted in TRM Table 13.3.1-1, Item 6. The response time is modified by a note which indicates that the 8 second response time includes the thermal well (which includes the RTD) response time. The proposed change would clarify that a maximum of 6 seconds is allowed for the RTD/thermal well response time, as described in FSAR Table 15.0-4. Taken together with the overall response time requirement of 8 seconds, the allowed response time components (RTD/thermal well and "electronic") are specified in a manner consistent with the accident analyses.

Change Request Number	TR - 99 - 8 . 1
Related SER : 7.2.1	SSER : 22
SER/SSER Impact	N

13.7- 30

2	Required Action B.1 of TR 13.7.40, "Feedwater Control Valves (FCVs) and Associated Bypass Valves," is revised from "Restore affected FCV(s) to OPERABLE." to "Restore affected FCV bypass valve(s) to OPERABLE."
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Correction

During the internal review process for Technical Requirements Manual Revision 29, Required Action B.1 was marked to read "Restore affected FCV bypass valve(s) to OPERABLE." This markup was inadvertently not incorporated. Condition B of TR 13.7.40 states, "One or more FCV bypass valve(s) inoperable." Since the Condition is specific to "bypass valve(s)" Required Action B.1 is corrected to agree with the Condition B. This clarification corrects an editorial word processing error.

Change Request Number	TR - 2,0 - 1 . 1
Related SER :	SSER :
SER/SSER Impact	N

15.0- 1

3	Revises the discussion regarding document distribution (new TR 15.5.17.c, previously TR 15.5.17.d) by deleting unnecessary details and stating that site wide procedures are used for licensing basis document control.
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Revision

Deleting the unnecessary details regarding the document distribution

Enclosure to TXX-00119

[Technical Requirements Manual, Revision 34: Replacement Pages 13.1-22, 13.1-24, 13.2-4, 13.3-2, 13.7-30, 15.0-1, 15.0-2, B 13.1-10, B 13.2-2, B 13.3-1]

COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 & 2
 TECHNICAL REQUIREMENTS MANUAL (TRM) INFORMATION ONLY
 INSTRUCTION SHEET
 (Page 1 of 1)

The following instructional information and checklist is being furnished to help insert Revision 34 TRM pages into the Comanche Peak Steam Electric Station TRM.

<u>Insert</u>		<u>Remove</u>
	<u>Section 13.1</u>	
13.1-22		13.1-22
13.1-24		13.1-24
	<u>Section 13.2</u>	
13.2-4		13.2-4
	<u>Section 13.3</u>	
13.3-2		13.3-2
	<u>Section 13.7</u>	
13.7-30		13.7-30
	<u>Section 15.0</u>	
15.0-1		15.0-1
15.0-2		15.0-2
	<u>Bases Section 13.1</u>	
B 13.1-10		B 13.1-10
	<u>Bases Section 13.2</u>	
B 13.2-2		B 13.2-2
	<u>Bases Section 13.3</u>	
B 13.3-1		B 13.3-1
	<u>List of Effective Pages</u>	
EPL-1 through EPL-7		EPL-1 through EPL-7

Note: Please complete the entry for insertion of Revision 34 on the "Record of Changes" form located at the beginning of the TRM.

13.1 REACTIVITY CONTROL SYSTEMS

TR 13.1.39 Rod Position Indication - Shutdown

TR LCO 13.1.39 One digital rod position indicator (DRPI), excluding demand position indication, shall be OPERABLE for each shutdown or control rod not fully inserted.

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APPLICABILITY: MODES 3, 4 and 5

-----NOTES-----

1. This TR LCO is not applicable if the Rod Control System is incapable of rod withdrawal.
2. This TR LCO is not applicable if Keff is maintained less than or equal to 0.95, and no more than one shutdown or control bank is withdrawn from the fully inserted position.
3. The DRPI System may be de-energized to collect rod drop time data in accordance with SR 3.1.4.3 provided no more than one shutdown or control bank is withdrawn from the fully inserted position and the DRPI System is available during the withdrawal of the shutdown or control bank.

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SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
TRS 13.1.39.1	Verify each DRPI agrees within 12 steps of the group demand position when the rods are stationary and within 24 steps of the group demand position during rod motion over the full indicated range of rod travel.	Once prior to increasing Keff above 0.95 after each removal of the reactor vessel head.

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SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>TRS 13.2.32.1 -----NOTE-----</p> <ol style="list-style-type: none"> 1. Only required to be performed when the AFD Monitor Alarm is determined to be inoperable and for the first 24 hours after restoring to OPERABLE status. 2. Logged values shall be assumed to exist during interval preceding each logging. <p>-----</p> <p>Monitor and log AFD to verify AFD is within limits for each OPERABLE excore channel.</p>	<p>1 hour for the first 24 hours that the AFD Monitor Alarm is inoperable</p> <p><u>AND</u></p> <p>30 minutes when AFD Monitor Alarm is inoperable for > 24 hours</p> <p><u>AND</u></p> <p>-----NOTE----- Only required if the AFD Monitor Alarm Cumulative penalty minute history data is not current. -----</p> <p>1 hour for the first 24 hours after restoring the AFD Monitor Alarm to OPERABLE status.</p>

Table 13.3.1-1 (Page 1 of 2)
Reactor Trip System (RTS) Instrumentation Response Time Limits

INITIATION SIGNAL		RESPONSE TIME IN SECONDS
1.	Manual Reactor Trip	N.A.
2.	Power Range Neutron Flux	
	a. High Setpoint	$\leq 0.5^{(1)}$
	b. Low Setpoint	$\leq 0.5^{(1)}$
3.	Power Range Neutron Flux High Positive Rate	N.A.
4.	Intermediate Range Neutron Flux	N.A.
5.	Source Range Neutron Flux	N.A.
6.	Overtemperature N-16	$\leq 8^{(1,2)}$
7.	Overpower N-16	$\leq 2^{(1)}$
8.	Pressurizer Pressure	
	a. Pressurizer Pressure Low	≤ 2
	b. Pressurizer Pressure High	≤ 2
9.	Pressurizer Water Level High	N.A.
10.	Reactor Coolant Flow Low	$\leq 1^{(3)}$
11.	Not Used	N.A.

(continued)

- (1) Neutron/gamma detectors are exempt from response time testing. Response time of the neutron/gamma flux signal portion of the channel shall be measured from detector output or input of first electronic component in a channel.
- (2) Includes a maximum of 6 seconds for the RTD/thermal well response time.
- (3) Includes Single Loop (Above P-8) and Two Loops (Above P-7 and Below P-8).

13.7 PLANT SYSTEMS

TR 13.7.40 Feedwater Control Valves (FCVs) and Associated Bypass Valves

TR LCO 13.7.40 Four FCVs and associated bypass valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3 except when FCV or associated bypass valve is closed and de-activated or isolated by a closed manual valve.

ACTIONS

-----NOTE-----

Separate Condition entry allowed for each valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more FCVs inoperable.	A.1 Restore affected FCV(s) to OPERABLE.	7 days
	<u>OR</u>	
	A.2 Perform an assessment per the corrective action program to allow continued operation beyond 7 days.	7 days
B. One or more FCV bypass valve(s) inoperable.	B.1 Restore affected FCV bypass valve(s) to OPERABLE.	7 days
	<u>OR</u>	
	B.2 Perform an assessment per the corrective action program to allow continued operation beyond 7 days.	7 days

15.0 ADMINISTRATIVE CONTROLS

15.5 Programs and Manuals

TR 15.5.17 TRM - Administrative Control Process

a. Introduction

CPSES has relocated certain information from the Technical Specifications to a separate controlled document based on the NUMARC Technical Specification Improvement Program, the Westinghouse Owners Group MERITS Program, and the Commission's Interim Policy Statement for improvement of Technical Specifications for nuclear power plants (52 FR 3788 of February 6, 1987). This information is now contained in a separate document to be called the CPSES Technical Requirements Manual (TRM). The following is a description of the administrative program for control, distribution, updating, and amending the information contained in the TRM. The Explosive Gas and Storage Tank Radioactivity Monitoring Program, as required by TS 5.5.12, is contained in Section 13.10 of the TRM.

b. Document Control

The TRM is considered a licensing basis document and as such, overall control of the document is addressed by the site-wide procedures for licensing document control.

c. Document Distribution

The TRM is considered a controlled document and distribution is controlled by site wide procedures for licensing basis document control.

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(continued)

d. Changes / Deletions to the TRM | 34

Changes to the TRM are controlled by the procedure on licensing document change control. This procedure addresses the administrative requirements necessary to change/amend CPSES licensing documents (e.g., Fire Protection Report, Offsite Dose Calculation Manual). For changes to the TRM, the procedure requires initiation of a Licensing Document Change Request (LDCR). The LDCR is the mechanism whereby changes are tracked to ensure that appropriate reviews, approvals, and signatures are obtained. TRM changes are evaluated per 10CFR50.59. TRM changes require a review by SORC and the approval of the Vice President of Nuclear Operations. Changes to the TRM must comply with the requirements of Technical Specification 5.5.17 of the CPSES Unit 1 and 2 Technical Specifications.

e. Plant Changes That May Affect the TRM | 34

Changes made at CPSES have the potential to affect (or be affected by) the TRM. These include items such as design modifications, procedure changes, other licensing document changes, etc. The TRM has been identified as a CPSES licensing basis document by the 10CFR50.59 Program. This program requires that the TRM be considered in a manner similar to the FSAR when screening changes to determine if an unreviewed safety question might be involved.

f. Distribution of TRM Changes / Deletions | 34

Changes to the TRM will be issued on a replacement page basis to controlled document holders promptly following approval of the change.

g. Report of TRM Changes / Deletions to the NRC | 34

Changes to the TRM will be reported to the NRC on the same frequency as the FSAR. Related safety evaluations will be reported as part of the 50.59 annual report.

Proposed TRM changes that are determined to constitute an unreviewed safety question (as defined by 10CFR50.59(a)(2)) will either not be made or will be submitted to the NRC for prior review and approval.

(continued)

B 13.1 REACTIVITY CONTROL SYSTEMS

TRB 13.1.39 Rod Position Indication - Shutdown

BASES

Related requirements/information is located in Technical Specification Bases Section 3.1.7.

The following discussion is provided to clarify TR 13.1.39 APPLICABILITY.

Control rod testing includes the following independent but related activities:

1. Digital Position Indication System (DRPI) testing per SR 3.1.7.1 and TRS 13.1.39.1,
2. Control rod drop timing per SR 3.1.4.3, and
3. Control Rod Drive Mechanism (CRDM) step traces, which is not a Surveillance Requirement, but is an integral part of control rod functional testing.

These activities may be performed independently or concurrently.

If Keff is maintained ≤ 0.95 , and no more than one shutdown or control bank is withdrawn from the fully inserted position, control rods may be withdrawing in MODES 3, 4, and 5 for any reason. The limitations on Keff and control rod bank withdrawal are consistent with assumptions made in the design calculations that determine the boron concentration necessary to provide assurance that inadvertent criticality will be avoided.

Once DRPI is declared OPERABLE for all shutdown and control banks, the requirement for Keff ≤ 0.95 is removed. This allows for significantly reduced boron concentration in preparation for plant startup activities.

One CPSES approved method of measuring rod drop times is an established industry method that produces DRPI coil voltage traces. The standard procedure withdraws one shutdown or control bank at a time. DRPI shall be available (but may or may not be OPERABLE) during the withdrawal of the rods, with the limitations on Keff described above. The data necessary to generate DRPI coil voltage traces is obtained from the induced voltage in the position indicator coils as the rod is dropped. The induced voltage is small compared to normal voltage and cannot be observed if DRPI remains energized and OPERABLE. With the rods fully withdrawn, DRPI is de-energized, rendering it inoperable, and the reactor trip breakers are opened to drop the rods. Once the rods have been dropped, DRPI is energized again.

Another CPSES approved method of measuring rod drop times uses the Plant Process Computer (PPC). The PPC method relies on normal operating DRPI indications to determine the time a control rod reaches a specified position. DRPI shall be available (but may or may not be OPERABLE) during the withdrawal of the rods, with the limitations on Keff described above. DRPI remains energized during testing.

B 13.2 POWER DISTRIBUTION LIMITS

TRB 13.2.32 Axial Flux Difference (AFD)

BASES

Related information is located in Technical Specification Bases Section 3.2.3

A Note in the Frequency for Technical Requirement Surveillance (TRS) 13.2.32.1 relaxes the requirement of logging Axial Flux Difference (AFD) data for 24 hours after the AFD Monitor is restored. The plant computer is capable of retaining AFD historical data in the event of a computer failure and will accept new data after it is restored to service such that it does not need to operate for 24 hours in order to create the 24 hour history required for AFD monitoring.

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In the event the AFD Monitor Alarm is inoperable, TRM Surveillance 13.2.32.1 requires logging the AFD value with a specific frequency. The purpose of the logging function is for the calculation of AFD penalty minutes for which a 24 hour history is required. The requirement to periodically monitor the AFD indication is not relaxed nor is the requirement to comply with the AFD penalty minute limitations of TS 3.2.3 affected.

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B 13.3 INSTRUMENTATION

TRB 13.3.1 Reactor Trip System (RTS) Instrumentation Response Times

BASES

The bases for the Reactor Trip System are contained in the CPSES Technical Specifications. The measurement of response time at the specified frequencies provides assurance that the Reactor trip actuation associated with each channel is completed within the time limit assumed in the safety analyses. No credit was taken in the analyses for those channels with response times indicated as not applicable. Response time may be demonstrated by any series of sequential, overlapping, or total channel test measurements provided that such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either: (1) in place, onsite, or offsite test measurements, or (2) utilizing replacement sensors with certified response time.

The overall response time limit for the overtemperature N-16 reactor trip function is 8 seconds, as noted in TRM Table 13.3.1-1, Item 6. Note 2 clarifies that a maximum of 6 seconds is allowed for the RTD/thermal well response time, as described in FSAR Table 15.0-4. Taken together with the overall response time requirement of 8 seconds, the allowed response time components (RTD/thermal well and "electronic") are specified in a manner consistent with the accident analyses.

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COMANCHE PEAK ELECTRIC STATION UNITS 1 & 2
TECHNICAL REQUIREMENTS MANUAL (TRM)

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Revision 4	April 24, 1991
Revision 5	September 6, 1991
Revision 6	November 22, 1991
Revision 7	March 18, 1992
Revision 8	June 30, 1992
Revision 9	December 18, 1992
Revision 10	January 22, 1993
Revision 11	February 3, 1993
Revision 12	July 15, 1993
Revision 13	September 14, 1993
Revision 14	November 30, 1993
Revision 15	April 15, 1994
Revision 16	May 11, 1994
Revision 17	February 24, 1995
Revision 18	April 14, 1995
Revision 19	May 15, 1995
Revision 20	June 30, 1995
Revision 21	January 24, 1996
Revision 22	February 24, 1997
Revision 23	March 13, 1997
Revision 24	June 26, 1997
Revision 25	July 31, 1997
Revision 26	February 24, 1998
Revision 27	April 14, 1999
Revision 28	April 16, 1999
Revision 29	July 27, 1999
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