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Ref: 10CFR50.71  
10CFR50.4

CPSES-200001486  
Log # TXX-00126  
File # 10010

July 5, 2000

U.S. Nuclear Regulatory Commission  
Records Management Branch  
Information Management Division  
Office of the Chief Information Officer  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REQUEST FOR EXCEPTION TO 10CFR50.4 FOR UPDATES TO  
THE FINAL SAFETY ANALYSIS REPORT

Gentlemen:

TXU Electric periodically submits revisions to the updated Final Safety Analysis Report (FSAR) pursuant to 10CFR50.71(e) and in accordance with 10CFR50.4(b)(6). The updated FSAR copies have been provided in paper form as required by 10CFR50.4(c). However, 10CFR50.4(c) also allows the NRC to grant exceptions to these requirements. By this letter, TXU Electric is requesting approval of an exception to permit future updates to the FSAR to be submitted in CD-ROM format in lieu of paper copies.

10CFR50.4(b)(6) currently requires the signed original and 10 copies of the updated FSAR, or replacement pages per 10CFR50.71(e), to be submitted to the NRC Document Control Desk, one copy to the appropriate Regional Office and one copy to the NRC Resident Inspector. 10CFR50.4(c) requires all copies to be in permanent form on unglazed paper. Currently, TXU Electric submits the replacement pages for the updated FSAR. A signed original (a signed transmittal with the original set of replacement pages) and one copy are provided to the Document Control Desk. Additional copies are distributed as shown in the transmittal letter. It is TXU Electric's intent to continue to provide the signed original transmittal letter to the NRC Document Control Desk and to substitute CD-ROMs for the sets of FSAR

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replacement pages. TXU Electric also desires to have the option to continue to send the copies in paper form. It should be noted however, once the FSAR updates are sent on CD-ROMs, it is unlikely that TXU Electric would again issue the paper copies since this would require reissuing the complete FSAR.

Therefore, TXU Electric requests approval to submit the updated FSAR pursuant to 10CFR50.71(e) as follows:

- i. One signed original transmittal letter with one CD-ROM or one paper original to the Document Control Desk
- ii. Ten CD-ROMs or ten paper copies to the Document Control Desk
- iii. One CD-ROM or one paper copy to the Regional Administrator
- iv. One CD-ROM or one paper copy to the Senior Resident Inspector

This alternative is requested as an exception to the form of communications addressed by 10CFR50.4(c).

We intend to submit the CD-ROM copies as complete reissues of the updated FSAR (i.e., the updated FSAR will include the previous pages still applicable and the updated replacement pages) in the PDF file format, which can be read by utilizing the Adobe Acrobat Reader software.

The NRC is free to copy the CD-ROMs and make them available to members of the public.

It is also our intention to include on the same CD-ROMs, updates to other licensing basis documents which have the same update periodicity requirements as the FSAR (e.g., Technical Specification Bases, Technical Requirements Manual, 50.59 Evaluation Summaries).

This request is similar to previously docketed requests submitted by Florida Power Corporation dated May 21, 1998, Tennessee Valley Authority dated October 1, 1999, and Entergy Operations Inc dated February 22, 2000, which were approved by the NRC via letters dated June 19, 1998, October 14, 1999, and March 24, 2000, respectively.

This exception request is needed to accommodate the next CPSES FSAR update which is due February 1, 2001.

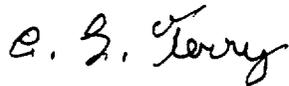
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This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

If you have any questions regarding this request, please contact Bob Dacko at (254) 897-0122

Sincerely,



C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

BSD/bd

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