Mr. C. Lance Terry
Senior Vice President
& Principal Nuclear Officer
TXU Electric
Attn: Regulatory Affairs Department
P. O. Box 1002
Glen Rose, TX 76043

September 5, 2000

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: ADMINISTRATIVE CONTROLS FOR OPEN PENETRATIONS DURING REFUELING OPERATIONS (TAC NOS. MA9071 AND MA9072)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment No. 79 to Facility Operating License No. NPF-87 and Amendment No. 79 to Facility Operating License No. NPF-89 for CPSES, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated May 25, 2000.

The amendments revise the TS to allow certain reactor containment building penetrations to be open during refueling activities under appropriate administrative controls. Specifically, this revision fully adopts the NRC-approved Technical Specification Task Force (TSTF) Traveler TSTF-312, Revision 1, by adding a Note to TS 3.9.4.c denoting this provision, to clarify the use of this allowance.

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

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

Enclosures:
1. Amendment No. 79 to NPF-87
2. Amendment No. 79 to NPF-89
3. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 5, 2000

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TXU ELECTRIC

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT NO. 1

DOCKET NO. 50-445

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 79
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by TXU Electric dated May 25, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-87 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 79 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TXU Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A. Gramm

Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 5, 2000

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TXU ELECTRIC

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT NO. 2

DOCKET NO. 50-446

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 79
License No. NPF-89

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by TXU Electric dated May 25, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-89 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 79 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TXU Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A Gramm

Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 5, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 79

TO FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 79

FACILITY OPERATING LICENSE NO. NPF-89

DOCKET NOS. 50-445 AND 50-446

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by an amendment number and contains a marginal line indicating the area of change.

Remove	Insert
3.9-7	3.9-7

3.9 REFUELING OPERATIONS

3.9.4 Containment Penetrations

LCO 3.9.4 The containment penetrations shall be in the following status:

a. The equipment hatch closed and held in place by four bolts;

b. One door in the emergency air lock closed and one door in the personnel airlock capable of being closed; and

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:

1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or

2. capable of being closed by an OPERABLE containment ventilation isolation valve.

---------- NOTE ----------
Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

APPLICABILITY: During CORE ALTERATIONS,
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more containment penetrations not in required status.	A.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	A.2	Suspend movement of irradiated fuel assemblies within containment.	Immediately

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 79 TO

FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 79 TO

FACILITY OPERATING LICENSE NO. NPF-89

TXU ELECTRIC

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated May 25, 2000, TXU Electric (the licensee) requested changes to the Technical Specifications (TSs) for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The changes will allow certain reactor containment building penetrations to be open during refueling activities under appropriate administrative controls. Specifically, this revision fully adopts the NRC-approved TS Task Force (TSTF) Traveler TSTF-312, Revision 1, by adding a Note to TS 3.9.4.c denoting this provision, to clarify the use of this allowance.

2.0 BACKGROUND

The existing TS 3.9.4 for CPSES requires that the primary containment be capable of containing fission product radioactivity that may be released from the reactor core following a fuel-handling accident (FHA) inside containment. This TS establishes containment closure requirements, which limit the potential escape paths for fission products by insuring that there is at least one integral barrier to the release of radioactive material. TS 3.9.4 requires a minimum of one door in the emergency airlock to be closed and at least one door in the personnel airlock to be capable of being closed, and requires that each penetration providing direct access from the containment atmosphere to the outside atmosphere either be closed by manual or automatic isolation valve, blind flange, or "equivalent."

The TS change allows the containment flow paths to remain open while using administrative controls consistent with TSTF-312, Revision 1, which was approved by a letter dated August 16, 1999, from William D. Beckner to James Davis of the Nuclear Energy Institute. TSTF-312, Revision 1, adds a Note to TS 3.9.4.c allowing penetration flow path(s) that have a direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls.

The change is similar to existing TS 3.6.3, "Containment Isolation Valves," which allows penetration flow paths to be unisolated under administrative controls while the reactor is in Mode 1 through Mode 4.

3.0 EVALUATION

The current CPSES TS 3.9.4.c is as follows:

> 3.9.4 The containment building penetrations shall be in the following status:
>
> c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
>
> 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or
>
> 2. capable of being closed by an OPERABLE containment ventilation isolation valve.

The limiting condition for operation is applicable during core alterations or during movement of irradiated fuel assemblies within the containment, and thus would require that some outage activities be interrupted while fuel-handling activities or core alterations are in progress. The change will allow for more efficient performance of outage work while continuing to provide an acceptable barrier against the release of fission product radioactivity to the outside atmosphere during core alterations or fuel-handling activities inside containment. The Nuclear Regulatory Commission (NRC) staff reviewed the licensee's analysis for ensuring that there exists an acceptable barrier against the release of fission product radioactivity during core alterations or fuel-handling activities inside containment as well as a FHA in containment (FHAIC). For CPSES, the design basis for the FHAIC is defined as the dropping of the spent fuel assembly in the spent fuel pool fuel storage area or inside containment. The licensee stated that both analyses assume the rupture of the cladding of all the fuel rods in the assembly, and has provided with its submittal the results from the CPSES current analysis of a FHAIC. The licensee's analysis of the FHAIC indicates an exclusion area boundary thyroid dose of 53.9 roentgen equivalent man (rem) and whole body (WB) dose of 0.44 rem, without credit for the mitigation effects of the primary containment. The results are well within the 10 CFR Part 100 offsite dose limits of 300 rem thyroid and 25 rem WB, and thus meets the Standard Review Plan 15.7.4 acceptance limits of 75 rem thyroid and 6 rem WB.

The NRC staff has also reviewed the CPSES's FHA analyses presented in the CPSES Final Safety Analysis Report, and finds that the analyses considered dropping a single irradiated fuel assembly in either the containment or fuel building, with no credit for isolation or filtration, and the postulated FHA outside containment remains the limiting FHA when considering the FHA inside containment with open penetration flow paths. The licensee further stated that for a FHAIC with open containment penetration, transmission of radionuclides outside containment is unlikely because the dispersion of radioactive material through the containment will not be driven by any pressure differential resulting from the accident, but only due to containment air circulation.

In its submittal, the licensee inserted a Note (denoted by a NOTE after TS 3.9.4.c.2) that allows penetration flow paths that travel outside the containment, to be temporarily open (or unisolated) provided specific administrative controls are utilized. The Note reads as follows:

> Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

This Note is consistent with Insert 1 of the staff-approved TSTF-312, Revision 1.

The licensee's May 25, 2000, application contains commitments concerning the development of appropriate station procedures for the administrative control of unisolated penetration flow path(s). The details of the administrative controls that are to be added to the TS Bases discussion for this TS change, and the station procedures, include awareness of appropriate personnel of the open status of the flow paths during core alterations, movement of irradiated fuel assemblies within the containment, and the designation of individuals to be readily available to promptly isolate the open flow path in the event of a FHAIC. This information is consistent with the Insert 2 of the staff-approved TSTF-312, Revision 1.

The NRC staff finds the TS change and the availability of compensatory measures for a prompt closure of the containment penetration flow paths using dedicated individuals to be consistent with General Design Criteria 61 of Appendix A to 10 CFR Part 50, for assuring adequate safety and minimizing the potential spread of radioactive isotopes from the containment to the outside environment during an event, and therefore, the change is acceptable and is in conformance with TSTF-312, Revision 1 to the Standard TS.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 43053 dated July 12, 2000). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: N. B. Le
D. Jaffe

Date: September 5, 2000