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**C. Lance Terry**  
Senior Vice President & Principal Nuclear Officer

Ref: 10CFR50.90

CPSES-200002193  
Log # TXX-00177  
File # 00236

September 15, 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) 00-008**  
**REVISION TO TECHNICAL SPECIFICATION (TS) 5.6.6**  
**PRESSURE AND TEMPERATURE LIMITS REPORT**

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 Units 1 and 2 Technical Specifications. This change request applies to both units.

The proposed change will revise TS 5.6.6 entitled "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)." The proposed change replaces the general references currently provided in the specification for determining the RCS pressure and temperature limits with the requirement that the P/T Limits and LTOP System Setpoints shall not be revised without prior NRC approval.

Attachment 1 is the required affidavit. Attachment 2 provides a detailed description of the proposed changes, a safety analysis of the proposed changes, TXU Electric's determination that the proposed changes do not involve a significant hazard consideration, a regulatory analysis of the proposed changes and an environmental evaluation. Attachment 3 provides the affected Technical Specification pages marked-up to reflect the proposed changes. Attachment 4 provides retyped Technical Specification pages which incorporate the requested changes.

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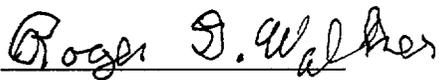
TXU Electric requests approval of the proposed License Amendment by September 15, 2001, to be implemented within 30 days of the issuance of the license amendment. The approval date was administratively selected to allow for NRC review but the plant does not require this amendment to allow continued safe full power operations.

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. Markup of Technical Specifications pages
5. Retyped Technical Specification Pages

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	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric Station,	)	License Nos. NPF-87
Units 1 & 2)	)	NPF-89

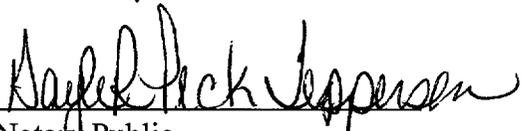
AFFIDAVIT

Roger D. Walker being duly sworn, hereby deposes and says that he is the 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 00-008; 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 14<sup>th</sup> day of September, 2000.

  
 Notary Public



**ATTACHMENT 2 to TXX-00177**  
**DESCRIPTION AND ASSESSMENT**

## **Description and Assessment**

### **1.0 INTRODUCTION**

Proposed change LAR 00-008 is a request to revise Technical Specifications (TS) 5.6.6 entitled "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)" for Comanche Peak Steam Electric Station (CPSES) Units 1 and 2.

No changes to the CPSES Final Safety Analysis Report are anticipated at this time as a result of this License Amendment Request.

### **2.0 DESCRIPTION**

The proposed change will revise TS 5.6.6 entitled "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)." The proposed change replaces the general references currently provided in the specification for determining the RCS pressure and temperature limits with the requirement that the P/T Limits and LTOP System Setpoints shall not be revised without prior NRC approval.

There are no associated Technical Specification Bases changes anticipated at this time as a result of this License Amendment Request.

### **3.0 BACKGROUND**

License Amendment 64 to the CPSES Technical Specifications converted the Technical Specifications to the improved Technical Specifications. As part of that conversion, the NRC approved the relocation of certain information to a licensee controlled document, the "Pressure and Temperature Limits Report" (PTLR). General requirements were added to the Technical Specifications (5.6.6, "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)") to control the content and the analytical methodologies in the PTLR. Because plant specific analytical methods had not been approved for CPSES to determine certain RCS pressure and temperature limits which had been relocated, TXU Electric included a commitment in the PTLR that the "P/T Limits . . . and the LTOP System Setpoints . . . in this report shall not be revised without prior NRC approval." The NRC subsequently requested that this commitment be incorporated into the Technical Specification.

#### **4.0 TECHNICAL ANALYSIS**

This change is the relocation of a commitment. There is no technical impact. The values and limits in the PTLR are NRC approved and are acceptable for operation up to 16 EFPY.

#### **5.0 REGULATORY ANALYSIS**

##### **5.1 No significant Hazards 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 as discussed below:

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

Response: No

The addition of this requirement to the Technical Specifications is administrative and has no impact on accident initiation or mitigation.

Therefore, the proposed changes do 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 accident previously evaluated?

Response: No

The addition of this requirement to the Technical Specifications is administrative and cannot initiate an accident.

Therefore, the proposed change 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?

Response: No

The addition of this requirement to the Technical Specifications is administrative and has no impact on accident initiation or mitigation.

Therefore the proposed change does not involve a reduction in a margin of safety.

Based on the above evaluations, TXU Electric concludes that the activities associated with the above described changes present no significant hazards consideration under the standards set forth in 10CFR50.92 and accordingly, a finding by the NRC of no significant hazards consideration is justified.

## 5.2 Regulatory Safety Analysis

### Applicable Regulatory Requirements / Criteria

The content of the Technical Specification is controlled by 10CFR50.36. Guidance is provided by NUREG-1431, "Standard Technical Specifications (STS), Westinghouse Plants," Revision 1, dated April 1995, and Commission Final Policy Statement, "NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132).

On January 31, 1996, the NRC issued additional guidance in NRC Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits." The generic letter states, in part, that in order to relocate the curves and setpoints of concern to a PTLR, the licensee needs a methodology approved by the NRC to reference in its TS.

### Analysis

The NRC issued Amendment 64, the improved Technical Specifications for CPSES and allowed implementation based, in part, on TXU Electric's commitment in the PTLR that P/T Limits and the LTOP System Setpoints in the PTLR would not be revised without prior NRC approval.

### Conclusion

The relocation of TXU Electric's commitment to the Technical Specification will assure that the values of concern are not revised without a license amendment and thus prior NRC approval. As such, the proposed change to the Technical Specification will provide additional assurance of compliance with applicable regulatory obligations.

## **6.0 ENVIRONMENTAL EVALUATION**

TXU Electric has determined that the proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10CFR20, or would change an inspection or surveillance requirement. TXU Electric has evaluated the proposed changes and has determined that the changes do 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.

**ATTACHMENT 3 to TXX-00177**

**MARKUP OF TECHNICAL SPECIFICATION PAGE**

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5.6 Reporting Requirements (continued)

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5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:
  - 1. Specification 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and
  - 2. Specification 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

~~Because plant specific analytical methods have not been approved for CPSES, the P/T Limits and the LTOP System Setpoints shall not be revised without prior NRC approval.~~

- ~~1. The analytical methods used to determine the RCS pressure and temperature limits were developed in accordance with:~~

~~\_\_\_\_\_ 10 CFR 50 Appendix G and H  
\_\_\_\_\_ Regulatory Guide 1.99, Revision 2  
\_\_\_\_\_ NUREG-0800, Standard Review Plan Section 5.3.2  
\_\_\_\_\_ ASME Code Section III, Appendix G~~

- ~~2. Low Temperature Overpressurization Protection limits were developed in accordance with:~~

~~\_\_\_\_\_ 10 CFR 50 Appendix G  
\_\_\_\_\_ NUREG-0800, Standard Review Plan Section 5.2.2  
\_\_\_\_\_ Branch Technical Positions RSB 5-2 and METB 5-2~~

- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

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(continued)

**ATTACHMENT 4 to TXX-00177**

**RETYPE TECHNICAL SPECIFICATION PAGES**

Page 5.0-35

5.6 Reporting Requirements (continued)

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5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:
  1. Specification 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and
  2. Specification 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

Because plant specific analytical methods have not been approved for CPSES, the P/T Limits and the LTOP System Setpoints shall not be revised without prior NRC approval.
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

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