

November 27, 2000

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 -  
ISSUANCE OF AMENDMENT RE: PRESSURE AND TEMPERATURE LIMITS  
REPORT (TAC NOS. MA9834 AND MA9835)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment No. 81 to Facility Operating License No. NPF-87 and Amendment No. 81 to Facility Operating License No. NPF-89 for CPSES, Units 1 and 2, respectively. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated September 15, 2000.

The amendment replaces the general references currently provided in TS 5.6.6 for determining the reactor coolant system pressure and temperature limits (P/T Limits) with the requirement that the P/T Limits and the low temperature overpressure protection system setpoints shall not be revised without prior U.S. Nuclear Regulatory Commission approval.

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. 81 to NPF-87  
2. Amendment No. 81 to NPF-89  
3. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

PUBLIC

PDIV-1 Reading

G.Hill(4)

BElliott

RidsNrrDripRtsb (WBeckner)

RidsNrrDlpmPdiv (SRichards)

RidsNrrDlpmPdivLpdiv1 (RGramm)

RidsNrrPMDJaffe

RidsNrrPMRMoody

RidsNrrLADJohnson

RidsOgcRp

RidsAcrcAcnwMailCenter

RidsRgn4MailCenter (KBrockman, LHurley, DBujol)

KWichman

Accession No. ML0037

\*No change from review input.

OFFICE	PDIV-1/PM	PDIV-1	PDIV-1/LA	MCEB*	OGC	PDIV-1/SC
NAME	RMoody:lcc	DJaffe	DJohnson	KWichman	C Marco	RGramm
DATE	11/7/00	11/8/00	11/7/00	9/20/2000	11/22/2000	11/24/00

DOCUMENT NAME: G:\PDIV-1\ComanchePeak\amdma9834.wpd

OFFICIAL RECORD COPY

NRR-058

**Comanche Peak Steam Electric Station**

cc:

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 2159  
Glen Rose, TX 76403-2159

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

Mrs. Juanita Ellis, President  
Citizens Association for Sound Energy  
1426 South Polk  
Dallas, TX 75224

Mr. Roger D. Walker  
Regulatory Affairs Manager  
TXU Electric  
P. O. Box 1002  
Glen Rose, TX 76043

George L. Edgar, Esq.  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, DC 20036-5869

Honorable Dale McPherson  
County Judge  
P. O. Box 851  
Glen Rose, TX 76043

Office of the Governor  
ATTN: John Howard, Director  
Environmental and Natural  
Resources Policy  
P. O. Box 12428  
Austin, TX 78711

Arthur C. Tate, Director  
Division of Compliance & Inspection  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78756-3189

Jim Calloway  
Public Utility Commission of Texas  
Electric Industry Analysis  
P. O. Box 13326  
Austin, TX 78711-3326



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. 81  
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by TXU Electric dated September 15, 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. 81, 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

A handwritten signature in cursive script, appearing to read "Robert A. Gramm", followed by the word "FOR" in a smaller, less distinct script.

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: November 27, 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. 81  
License No. NPF-89

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by TXU Electric dated September 15, 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. 81, 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, 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: November 27, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 81

TO FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. \_\_\_\_\_

FACILITY OPERATING LICENSE NO. NPF-89

DOCKET NOS. 50-445 AND 50-446

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

ii  
5.0-35

Insert

ii  
5.0-35

TABLE OF CONTENTS (continued)

3.4	REACTOR COOLANT SYSTEM (RCS) .....	3.4-1
3.4.1	RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits .....	3.4-1
3.4.2	RCS Minimum Temperature for Criticality .....	3.4-4
3.4.3	RCS Pressure and Temperature (P/T) Limits .....	3.4-5
3.4.4	RCS Loops — MODES 1 and 2 .....	3.4-7
3.4.5	RCS Loops — MODE 3 .....	3.4-8
3.4.6	RCS Loops — MODE 4 .....	3.4-11
3.4.7	RCS Loops — MODE 5, Loops Filled .....	3.4-14
3.4.8	RCS Loops — MODE 5, Loops Not Filled .....	3.4-17
3.4.9	Pressurizer .....	3.4-19
3.4.10	Pressurizer Safety Valves .....	3.4-21
3.4.11	Pressurizer Power Operated Relief Valves (PORVs) .....	3.4-23
3.4.12	Low Temperature Overpressure Protection (LTOP) System .....	3.4-27
3.4.13	RCS Operational LEAKAGE .....	3.4-33
3.4.14	RCS Pressure Isolation Valve (PIV) Leakage .....	3.4-35
3.4.15	RCS Leakage Detection Instrumentation .....	3.4-40
3.4.16	RCS Specific Activity .....	3.4-44
3.5	EMERGENCY CORE COOLING SYSTEMS (ECCS) .....	3.5-1
3.5.1	Accumulators .....	3.5-1
3.5.2	ECCS — Operating .....	3.5-4
3.5.3	ECCS — Shutdown .....	3.5-8
3.5.4	Refueling Water Storage Tank (RWST) .....	3.5-10
3.5.5	Seal Injection Flow .....	3.5-12
3.6	CONTAINMENT SYSTEMS .....	3.6-1
3.6.1	Containment .....	3.6-1
3.6.2	Containment Air Locks .....	3.6-2
3.6.3	Containment Isolation Valves .....	3.6-7
3.6.4	Containment Pressure .....	3.6-16
3.6.5	Containment Air Temperature .....	3.6-17
3.6.6	Containment Spray System .....	3.6-18
3.6.7	Spray Additive System .....	3.6-20
3.6.8	Hydrogen Recombiners .....	3.6-22

(continued)

## 5.6 Reporting Requirements (continued)

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.

---

(continued)



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 81 TO

FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 81 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 September 15, 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 proposed changes would replace the general references currently provided in TS 5.6.6 for determining the reactor coolant system (RCS) pressure and temperature limits (P/T Limits) with the requirement that the P/T Limits and the low temperature overpressure protection (LTOP) system setpoints shall not be revised without prior U.S. Nuclear Regulatory Commission (NRC or the Commission) approval.

2.0 BACKGROUND

Generic Letter (GL) 96-03, "Relocation of the Pressure and Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," provides guidance to industry that curves and setpoints may be relocated outside the TSS to a licensee-controlled document (the P/T Limits Report (PTLR)) provided that the parameters for constructing the curves and setpoints are derived using a methodology approved by the NRC.

Attachment 1 to GL 96-03 identifies the minimum requirements to be included in the PTLR and indicates the PTLR or a similar document must be submitted to the NRC. The PTLR must contain the following information: (a) the values of neutron fluence that are used in the adjusted reference temperature (ART) calculation, (b) the surveillance capsule withdrawal schedule, or reference to the document that contains the schedule, (c) the LTOP system limits setpoint values or setpoint curves, (d) the limiting ART values, (e) the pressure-temperature (PT) curves, (f) the minimum temperatures for boltup and hydrotest, and (g) the supplemental data and calculations used to calculate the chemistry factor if the surveillance data is used in the ART calculation.

On August 24, 2000, CPSES submitted the PTLRs for Units 1 and 2 in accordance with TS 5.6.6. Upon review, NRC staff identified that the licensee had not provided a methodology for calculating the RCS P/T Limits and LTOP system limit curves. Since the licensee has not provided a methodology for calculating these curves, the licensee cannot update these curves without NRC approval. Based upon follow-up conversations, the licensee decided to submit a TS revision to replace the general references currently provided in the specification for determining the RCS P/T Limits with the requirement that the P/T Limits and the LTOP system setpoints shall not be revised without prior NRC approval.

### 3.0 EVALUATION

Although the licensee has not provided a methodology for calculating the PT and LTOP system limit curves, the PT and LTOP system limit curves that are contained in the PTLR are acceptable because they are identical to those previously contained in the CPSES, Units 1 and 2 TS. However, since the licensee has not provided a methodology, reviewed and approved by the NRC staff, for calculating PT and LTOP system limit curves, the licensee cannot update these curves without NRC approval.

The NRC staff has reviewed the proposed change to TS 5.6.6 and concludes that, until such time as the licensee provides a methodology, acceptable to the NRC staff for calculation of the PT and LTOP system limit curves, the proposed TS 5.6.6 will constrain the operation of CPSES, Units 1 and 2 to P/T Limits and values for LTOP setpoints previously reviewed and approved by the NRC staff. Accordingly, the proposed change to TS 5.6.6 is acceptable since it provides for NRC staff approval of the requisite methodology prior to the revision of P/T Limits and values for LTOP setpoints.

### 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 65351, dated November 1, 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: B. Elliot  
R. Moody  
D. Jaffe

Date: November 27, 2000