

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

November 27, 2000

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 -  
 CORRECTION OF SAFETY EVALUATION (SE) FOR AMENDMENT NO. 79 TO  
 FACILITY OPERATING LICENSE (FOL) NOS. NFP-87 AND NFP-89  
 (TAC NOS. MA5566, MA5567, MA9071 AND MA9072)**

Dear Mr. Terry:

On September 5, 2000, the Nuclear Regulatory Commission (NRC) issued Amendment No. 79 to FOL Nos. NPF-87 and NPF-89 for CPSES, Units 1 and 2, respectively. This letter is to clarify the wording on page 3 of the SE that was enclosed with those Amendments. The wording relates to the designation of individuals to be readily available to promptly isolate open flow paths in the event of a Fuel Handling Accident Inside Containment.

The last paragraph in Section 3.0, "Evaluation," of the SE incorrectly states that compensatory measures for prompt closing of containment flow paths will involve "dedicated individuals." To be compatible with CPSES's amendment request and the rest of wording in the SE, the wording in the last paragraph of Section 3.0 should refer to use of "designated" individuals rather than the use of "dedicated" individuals. In this regard, as indicated in your May 25, 2000, submittal, the "designated" individual would be "...a designated operator having continuous communication with the Control Room who can isolate the open valve in the event of an accident." A replacement page has been enclosed with the correction identified by a marginal line, to be inserted in your copy of the CPSES SE.

In an unrelated matter, CPSES Amendment No. 67 to FOL Nos. NFP-87 and NFP-89, issued on August 30, 1999, contained a Technical Specification (TS) page that was inadvertently misnumbered; TS page 3.3-21 should have been numbered page 3.3-20. Accordingly, we have enclosed corrected pages 3.3-20 and 3.3-21 to be inserted in your copy of the CPSES TSs.

We regret any inconvenience that these matters may have caused.

Sincerely, /RA/  
 David H. Jaffe, Senior Project Manager, Section 1  
 Project Directorate IV & Decommissioning  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

**DISTRIBUTION**

Enclosures: As stated

cc w/encls: See next page

PUBLIC  
 PDIV-1 Reading  
 RidsNrrDipmLpdiv (SRichards)  
 RidsNrrDipmLpdiv1 (RGramm)  
 RidsNrrPMDJaffe  
 RidsNrrPMRMoody  
 RidsNrrPMJDonohew  
 RidsNrrLADJohnson  
 RidsOgcRp  
 RidsAcrsAcnwMailCenter  
 RidsNrrDripRtsb (WBeckner)  
 GHill(4)  
 NLe  
 RidsRgn4MailCenter (KBrockman)

ACCESSION NUMBER: ML

OFFICE	PDIV-1/PM	PDIV-1/PM	PDIV-1/LA	TSB/BC	<del>OGC</del>	PDIV-1/SC
NAME	RMoody	DJaffe	DJohnson	WBeckner		RGramm
DATE	11/21/00	11/21/00	11/20/00	11/21/00		11/21/00

DOCUMENT NAME: G:\PDIV-1\ComanchePeak\lrrma9071.wpd

OFFICIAL RECORD COPY

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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 designated 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.

Table 3.3.1-1 (page 6 of 6)  
Reactor Trip System Instrumentation

Note 1: Overtemperature N-16

The Overtemperature N-16 Function Allowable Value shall not exceed the following setpoint by more than 1.72% of span for Unit 1, or 2.82% of span for Unit 2.

$$Q_{\text{setpoint}} = K_1 - K_2 \left[ \frac{(1 + T_1 s)}{(1 + T_2 s)} T_C - T_C^\circ \right] + K_3 (P - P^1) - f_1(\Delta q)$$

Where:

$Q_{\text{setpoint}}$  = Overtemperature N-16 trip setpoint,

$K_1$  = \*

$K_2$  = \*/°F

$K_3$  = \*/psig

$T_C$  = Cold leg temperature

$T_C^\circ$  = Reference  $T_C$  at RATED THERMAL POWER, °F

$P$  = Measured pressurizer pressure, psig

$P^1$  ≥ \* psig (Nominal RCS operating pressure)

$s$  = the Laplace transform operator, sec<sup>-1</sup>.

$T_1, T_2$  = Time constants utilized in lead-lag controller for  $T_C$ ,  
 $T_1$  ≥ \* sec, and  $T_2$  ≤ \* sec

$f_1(\Delta q)$  =

*·{(q <sub>t</sub> - q <sub>b</sub> ) + *%}	when (q <sub>t</sub> - q <sub>b</sub> ) ≤ *% RTP
0%	when *% RTP < (q <sub>t</sub> - q <sub>b</sub> ) < *% RTP
*·{(q <sub>t</sub> - q <sub>b</sub> ) - *%}	when (q <sub>t</sub> - q <sub>b</sub> ) ≥ *% RTP

Note 2: Not Used.

\* as specified in the COLR

3.3 INSTRUMENTATION

3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation

LCO 3.3.2 The ESFAS instrumentation for each Function in Table 3.3.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2-1

ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.2-1 for the channel(s) or train(s).	Immediately
B. One channel or train inoperable.	B.1 Restore channel or train to OPERABLE status.	48 hours
	<u>OR</u>	
	B.2.1 Be in MODE 3.	54 hours
	<u>AND</u>	
	B.2.2 Be in MODE 5.	84 hours

(continued)