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Senior Vice President & Principal Nuclear Officer

Ref: 10 CFR 50.90

CPSES-200002808
Log # TXX-00196
File # 10010, 00236

December 6, 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) 00-09
REVISION TO TECHNICAL SPECIFICATIONS 5.5.14
"TECHNICAL SPECIFICATIONS (TS) BASES CONTROL
PROGRAM" AND 5.5.17 "TECHNICAL REQUIREMENTS
MANUAL (TRM)"**

Gentlemen:

Pursuant to 10 CFR 50.90, 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 Unit 1 and 2 Technical Specifications. This change request applies to both units.

The proposed license amendment request (LAR) will revise Administrative Controls Specifications TS 5.5.14, entitled "Technical Specifications (TS) Bases Control Program" and TS 5.5.17, entitled "Technical Requirements Manual (TRM)" to incorporate the changes made to 10 CFR 50.59. The proposed changes would revise TS 5.5.14 and TS 5.5.17 consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-364, Revision 0 as amended by Westinghouse Owners Group (WOG) editorial change WOG-ED-24.

TXU Electric is submitting this license amendment application in conjunction with the industry consortium of five plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of the five plants operated by TXU Electric, AmerenUE, Wolf Creek Nuclear Operating

A001

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Corporation, Pacific Gas and Electric, and STP Nuclear Operating Company. AmerenUE is the lead plant for the proposed license amendment and the other members of the STARS group can also be expected to submit plant-specific license amendment requests similar to this one. These additional license amendment requests will be submitted in parallel with AmerenUE's application in order to reduce the amount of NRC resources required to evaluate and approve the applications.

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. Attachment 5 provides marked-up pages of the Final Safety Analysis Report (for information only) to reflect the proposed changes to the FSAR. Attachment 6 provides the STARS joint License Amendment Request (LAR) comparison table. STARS joint LAR comparison table identifies differences from the lead plant submittal.

TXU Electric requests approval of the proposed License Amendment by February 28, 2001, with the amendment being implemented within 60 days of issuance of the license amendment. The requested approval date coincides with the expected implementation date for the final rule associated with 10 CFR 50.59.

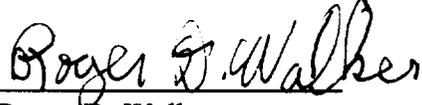
In accordance with 10 CFR 50.91(b), TXU Electric is providing the State of Texas with a copy of this proposed amendment.

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

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- Attachments
1. Affidavit
 2. Description and Assessment
 3. Markup of Technical Specifications pages
 4. Retyped Technical Specification Pages
 5. Proposed FSAR changes (for information)
 6. STARS joint LAR comparison table

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

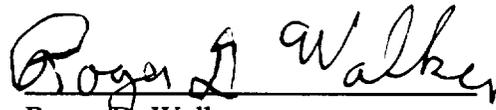
Mr. Authur C. Tate
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

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

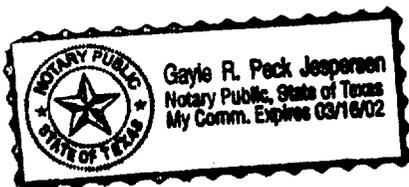
Roger D. Walker being duly sworn, hereby deposes and says that he is Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 00-09; that he is familiar with the content thereof; 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 6th day of December, 2000.





Notary Public

ATTACHMENT 2 to TXX-00196
DESCRIPTION AND ASSESSMENT

Description and Assessment

1.0 INTRODUCTION

1.1 This proposed License Amendment Request (LAR)-00-09 is a request pursuant to 10 CFR 50.90 to revise Technical Specifications (TS) 5.5.14, "Technical Specifications (TS) Bases Control Program," and TS 5.5.17, "Technical Requirements Manual (TRM)" for Comanche Peak Steam Electric Station (CPSES) Units 1 and 2.

1.2 Final Safety Analysis Report (FSAR) Section

Changes to the CPSES FSAR will be processed upon approval of this LAR. Proposed FSAR changes are attached for information only (Attachment 5)

2.0 DESCRIPTION

The proposed License Amendment would revise Administrative Controls TS 5.5.14b, 5.5.14b.2 and 5.5.17 to incorporate the changes made to 10 CFR 50.59 as published in the Federal Register (Reference 1). The proposed changes would revise TS 5.5.14 and TS 5.5.17 to; 1) replace the word "involve(s)" with "require(s)", and 2) replace the phrase "an unreviewed safety question as defined in" with "NRC approval pursuant to."

3.0 BACKGROUND

10 CFR 50.59 establishes the conditions under which licensees may make changes to the facility or procedures and conduct tests or experiments without prior NRC approval.

In 1999, the NRC revised its regulation (Reference 1) controlling changes, tests and experiments performed by nuclear plant licensees. The changes were prompted by the need to resolve differences in interpretations of the rule's requirements by the industry and the NRC that came into clear focus in 1996. The rule changes had two principal objectives, both aimed at restoring much needed regulatory stability to this extensively used regulation:

- Establish clear definitions to promote common understanding of the rule's requirements and
- Clarify the criteria for determining when changes, tests, and experiments require prior NRC approval.

The changes approved by the Commission in 1999 made 10 CFR 50.59 more focused and efficient by:

- Providing greater flexibility to licensees, primarily by allowing changes that have minimal safety impact to be made without NRC approval and
- Clarifying the threshold for “screening out” changes that do not require full evaluation under 10 CFR 50.59, primarily by adoption of key definitions.

Proposed changes, tests, and experiments that satisfy the definitions and one or more of the criteria in the rule must be reviewed and approved by the NRC before implementation.

The current TS Bases Control Program required by TS 5.5.14 and the Technical Requirements Manual (TRM) required by TS 5.5.17 allow licensees to make a change to the Bases or TRM without NRC approval provided the change does not involve "an unreviewed safety question as defined in 10 CFR 50.59." With the revisions to 10 CFR 50.59, the term “unreviewed safety question” was eliminated. Therefore, the TS should be revised consistent with the revision to 10 CFR 50.59. The proposed change is described below and is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-364, Revision 0 as amended by Westinghouse Owners Group (WOG) editorial change WOG-ED-24, (Reference 2).

4.0 TECHNICAL ANALYSIS

This proposed changes to TS 5.5.14 and TS 5.5.17 are made as a result of the NRC amending its regulation, 10 CFR 50.59, concerning the authority for licensees of production or utilization facilities, such as nuclear reactors, and independent spent fuel storage facilities, and for certificate holders for spent fuel storage casks, to make changes to the facility or procedures, or to conduct tests or experiments, without prior NRC approval. The final rule clarifies the specific types of changes, tests, and experiments conducted at a licensed facility or by a certificate holder that require evaluation, and revises the criteria that licensees and certificate holders must use to determine when NRC approval is needed before such changes, tests, or experiments can be implemented. The revised regulation eliminates the term “unreviewed safety question,” adds definitions for terms that have been subject to differing interpretations, and reorganizes the language of the regulation for clarity.

The proposed changes to TS 5.5.14 and TS 5.5.17 to incorporate the NRC approved TSTF-364, Revision 0 as amended by WOG-ED-24 do not have any impact on FSAR accident analyses. This change is administrative in nature based on the revision of 10 CFR 50.59.

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 10 CFR 50.92 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 proposed changes replace the word “involve(s)” with “require(s)” and deletes reference to the term “unreviewed safety question.” The above changes are consistent with the revision to 10 CFR 50.59. Consequently, the probability of an accident previously evaluated is not increased. Changes to the Technical Specification (TS) Bases and the Technical Requirements Manual (TRM) are still evaluated in accordance with 10 CFR 50.59. As a result, the consequences of any accident previously evaluated are not affected.

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 proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing plant operation. These changes are considered administrative changes and do not modify, add, delete, or relocate any technical requirements in the TS.

Therefore, the proposed changes do 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 proposed changes will not reduce the margin of safety because they have no direct effect on any safety analyses assumptions. Changes to the TS Bases and the TRM that result in meeting the criteria in paragraph (c)(2) of 10 CFR 50.59 will still require NRC approval. The proposed changes to TS 5.5.14 and TS 5.5.17 are considered administrative in nature based on the revisions to 10 CFR 50.59.

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 10 CFR 50.92 and accordingly, a finding by the NRC of no significant hazards consideration is justified.

5.2 Regulatory Safety Analysis

Applicable Regulatory Requirements/Criteria

The regulatory basis for TS 5.5.14, "Technical Specifications (TS) Bases Control Program," and TS 5.5.17, "Technical Requirements Manual (TRM)," is to ensure a program exists for processing changes to the Bases of the Technical Specifications and to the Technical Requirements Manual. These changes may or may not require NRC approval when evaluated in accordance with the requirements of 10 CFR 50.59.

10 CFR 50.36(a) requires that the TS have a summary statement of the bases or reasons for such specifications, but shall not become part of the TS. Thus, the Bases are required per this regulation but are not a part of the TS.

10 CFR 50.36(c)(5) requires that the TS include a category called "Administrative Control," that contains the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

The TRM is a licensee-controlled document to which certain information may be relocated if it does not meet the criteria of 10 CFR 50.36 to remain in the TS but which are important to safe plant operations. The TRM may contain actions that require declaring TS systems inoperable or that require a plant shutdown and as such the TRM requirements augment the TS requirements. The TRM was added to the Administrative Controls section of the TS when CPSES converted to the NUREG-1431 format to ensure that appropriate controls were applied to TRM changes.

Analysis

The regulatory requirements/criteria continue to be met. Changes to the TS Bases and the TRM will still be regulated by the latest revision to 10 CFR 50.59.

Conclusion

The proposed LAR is in compliance with 10 CFR 50.36(a), 10 CFR 50.36(c)(5), and 10 CFR 50.59.

6.0 ENVIRONMENTAL EVALUATION

TXU Electric has determined that the proposed amendment is a revision to an administrative procedure as described in 10 CFR 51.22(c)(10). Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.

7.0 REFERENCES

1. Federal Register, Vol. 64, No. 191, "Changes, Tests, and Experiments."
2. Industry/TSTF Standard Technical Specification Change Traveler TSTF-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Rev 0 as amended by WOG ED-24.

ATTACHMENT 3 to TXX-00196

MARKUP OF TECHNICAL SPECIFICATION PAGES

Pages 5.0-25 and 5.0-28

5.5 Programs and Manuals (continued)

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve require either of the following:
 1. a change in the TS incorporated in the license; or
 2. a change to the updated FSAR or Bases that involves an unreviewed safety question as defined in requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) and exemptions thereto.

(continued)

5.5 Programs and Manuals (continued)

5.5.17 Technical Requirements Manual (TRM)

The TRM contains selected requirements which do not meet the criteria for inclusion in the Technical Specification but are important to the operation of CPSES. Much of the information in the TRM was relocated from the TS.

Changes to the TRM shall be made under appropriate administrative controls and reviews. Changes may be made to the TRM without prior NRC approval provided the changes do not involve either a change to the TS or an ~~unreviewed safety question as defined in~~ NRC approval pursuant to 10 CFR 50.59. TRM changes require approval of the Plant Manager*.

5.5.18 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

- a. Provisions for the control and implementation of a Level 1, at-power, internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the LCO Action for preplanned activities.
- c. Provisions for performing an assessment after entering the LCO Action for unplanned entry into the LCO Action.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Action.
- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

* Duties may be performed by the Vice President of Nuclear Operations if that organizational position is assigned.

ATTACHMENT 4 to TXX-00196
RETIYPED TECHNICAL SPECIFICATION PAGES

Pages 5.0-25 and 5.0-28

5.5 Programs and Manuals (continued)

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 1. a change in the TS incorporated in the license; or
 2. a change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) and exemptions thereto.

(continued)

5.5 Programs and Manuals (continued)

5.5.17 Technical Requirements Manual (TRM)

The TRM contains selected requirements which do not meet the criteria for inclusion in the Technical Specification but are important to the operation of CPSES. Much of the information in the TRM was relocated from the TS.

Changes to the TRM shall be made under appropriate administrative controls and reviews. Changes may be made to the TRM without prior NRC approval provided the changes do not require either a change to the TS or NRC approval pursuant to 10 CFR 50.59. TRM changes require approval of the Plant Manager*.

5.5.18 Configuration Risk Management Program (CRMP)

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- a. Provisions for the control and implementation of a Level 1, at-power, internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the LCO Action for preplanned activities.
- c. Provisions for performing an assessment after entering the LCO Action for unplanned entry into the LCO Action.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Action.
- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

* Duties may be performed by the Vice President of Nuclear Operations if that organizational position is assigned.

ATTACHMENT 5 to TXX-00196

PROPOSED FSAR CHANGES (FOR INFORMATION)

Pages 17.2-4, 17.2-6, 17.2-12, 17.2-17 and 17.2-21

CPSES/FSAR

The SORC shall meet at least once per calendar month and as convened by the SORC Chairman or his designated alternate.

The quorum of the SORC necessary for the performance of the SORC responsibility and authority shall consist of the Chairman or his designated alternate and a majority of the regular members (or their alternates).

17.2.1.1.2.1.1 The SORC shall be responsible for:

- a. Review of applicable administrative procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Review of ~~the safety evaluations for:~~ (1) procedures, (2) change to procedures, equipment, systems or facilities, and (3) tests or experiments where the safety assessment determine that nuclear safety could be affected; ~~completed under the provision of 10CFR50.59 to verify that such actions did not constitute an unreviewed safety question;~~
- c. Review of proposed procedures and changes to procedures, equipment, systems or facilities which ~~require an amendment to the operating license; involve an unreviewed safety question as defined in 10CFR50.59 or involves a change in~~ Technical Specifications;
- d. Review of proposed test or experiments which ~~involve an unreviewed safety question as defined in 10CFR50.59 or requires a change~~ require an amendment to the operating license; ~~in~~ Technical Specifications;
- e. Review of proposed changes to Technical Specifications or the Operating License:
- f. Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President & Principal Nuclear Officer and to the ORC:

CPSES/FSAR

~~b. Render determinations in writing with regard to whether or not each item considered under items a through e above, constitutes an unreviewed safety question; and~~

bc. Provide written notification within 24 hours to the Senior Vice President & Principal Nuclear Officer, and the Operations Review Committee of disagreement between the SORC and the designated manager (see Section 17.2.1.6) however, the Plant Manager (see Section 13.1.1.2.1) shall have responsibility for resolution of such disagreements pursuant to Technical Specification 5.1.1.

The SORC shall maintain written minutes of each SORC meeting that, at a minimum, document the results of all SORC activities performed under the responsibility provisions above. Copies shall be provided to the Senior Vice President & Principal Nuclear Officer and the Operations Review Committee.

Any changes in the conduct of operation of the SORC will be made with the approval of the Plant Manager. Changes in the organization of the SORC will be made with the approval of the Plant Manager.

17.2.1.1.3 Nuclear Overview Manager

The Nuclear Overview Manager reports directly to the Senior Vice President & Principal Nuclear Officer and is responsible for assuring effective implementation of the Quality Assurance Program. This reporting relationship assures that the Nuclear Overview Manager has sufficient authority, organizational freedom, and independence from undue influence from, or responsibility for, costs and schedules such that the Nuclear Overview Manager can effectively assure implementation of and compliance with the CPSES operations quality assurance requirements and controls.

The Nuclear Overview Manager is responsible for submitting the Quality Assurance Manual for concurrence and approval to the Senior Vice President & Principal Nuclear Officer. The Nuclear Overview Manager is responsible for the performance of quality assurance activities in support of CPSES operation.

CPSES/FSAR

17.2.1.3.1 ORC Reviews

The ORC shall be responsible for the review of:

- a. The 10CFR50.59 safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10CFR50.59, to verify that such actions did not constitute an unreviewed safety question; require an amendment to the operating license;
- b. Proposed changes to procedures, equipment or systems which require a license amendment; involve an unreviewed safety question as defined 10CFR50.59;
- c. Proposed tests or experiments which require a license amendment; involve an unreviewed safety question as defined 10CFR50.59;
- d. Proposed changes to Technical Specifications or this the Operating License;
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All events submitted pursuant to 10CFR50.73;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the SORC.

17.2.1.3.2 ORC Audits

Audits of unit activities shall be performed under to cognizance of the ORC. These audits shall encompass:

CPSES/FSAR

- d. Individuals responsible for reviews performed in accordance with the requirements of items a and b above, shall be members of the Nuclear Operations Management staff previously designated by the Plant Manager (see Section 13.1.1.2.1). Each such review shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be done in accordance with the appropriate qualification requirements; and
- e. Each review shall include a determination of whether or not a license amendment pursuant to 10CFR50.59 is required. The Regulatory Affairs Manager (or his designee) shall review each 10CFR50.59 evaluation and render a determination in writing with regard to whether a or not a license amendment is required. ~~an unreviewed safety question is involved. For items involving unreviewed safety questions,~~ NRC approval of required license amendments shall be obtained prior to the Plant Manager approval for implementation.

Records of the above activities described above shall be provided to the Plant Manager (see Section 13.1.1.2.1), SORC, and/or ORC as necessary for the required reviews.

17.2.1.6.1 Reportable Events

The following action shall be taken for all events submitted pursuant to 10CFR50.73:

Each event shall be reviewed by the SORC, and the results of this review shall be submitted to the ORC and the Senior Vice President & Principal Nuclear Officer.

Written procedures shall be established, implemented and maintained covering the Process Control Program implementation.

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by FSAR Section 17.2.17.1.3(o). This documentation shall contain:
 - 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

CPSES/FSAR

1. Instructed as to the purpose, scope, and implementation of the Quality Assurance Program and related procedures and instructions as appropriate to their activities.
2. Qualified in the principles and techniques of activities for which they are responsible.
3. Retrained, re-examined or recertified, when appropriate, to maintain necessary proficiency in those activities for which they are responsible.

17.2.3 DESIGN CONTROL

Requirements for the control of design activities associated with modifications (involving a new design or change in existing design) of safety-related structures, systems, and components are consistent with the provisions of Regulatory Guide 1.33, and Regulatory Guide 1.64 as discussed in Appendix 1A(B).

The Plant Manager (see Section 13.1.1.2.1), or his designee, shall have the responsibility for approving and controlling the implementation of station design modifications. The Vice President of Nuclear Engineering and Support shall have the overall responsibility for developing procedures to maintain and control the design control process.

The SORC will submit all proposed station design modifications which involve a change in CPSES Technical Specifications or other changes to the operating license ~~an unreviewed safety question~~ to the ORC for review and approval before proceeding with implementation. Safety 10CFR50.59 evaluations on station design modifications which do not require a license amendment ~~involve unreviewed safety questions~~ or a change in CPSES Technical Specifications will be reviewed by ORC, however, this will not be a prerequisite for implementation. The Plant Manager (see Section 13.1.1.2.1), or his designee, approves each station design modification for implementation.

ATTACHMENT 6 to TXX-00196

STARS Joint License Amendment Request (LAR) Comparison Table

STARS JOINT LAR COMPARISON TABLE

CHANGE DESCRIPTION	CALLAWAY ⁽¹⁾	COMANCHE PEAK	DIABLO CANYON	SOUTH TEXAS PROJECT	WOLF CREEK
INTRODUCTION		Includes proposed changes to TS 5.5.17.		STP will submit similar changes as part of a separate license amendment request to revise portions of Section 6.0 of the STP Technical Specifications.	
DESCRIPTION (add rows as necessary to describe TS changes)		Includes proposed changes to TS 5.5.17.			
BACKGROUND		Includes proposed changes to TS 5.5.17.			
TECHNICAL ANALYSIS		Includes proposed changes to TS 5.5.17.			
NO SIGNIFICANT HAZARDS DETERMINATION		Includes proposed changes to TS 5.5.17.			
REGULATORY SAFETY ANALYSIS		Includes proposed changes to TS 5.5.17.			
ENVIRONMENTAL EVALUATION					
REFERENCES					

⁽¹⁾ AmerenUE is the lead utility for this LAR. This table identifies differences from the lead utility application.

SCHEDULAR TABLE ⁽²⁾

PROPOSED DATE	CALLAWAY	COMANCHE PEAK	DIABLO CANYON	SOUTH TEXAS PROJECT	WOLF CREEK
EXPECTED SUBMITTAL DATE	11/22/00	12/06/00	12/06/00	SEE NOTE BELOW	12/06/00
REQUESTED APPROVAL DATE	02/28/01	02/28/01	02/28/01	SEE NOTE BELOW	02/28/01
IMPLEMENTATION PERIOD	60 DAYS	60 DAYS	60 DAYS	SEE NOTE BELOW	60 DAYS

⁽²⁾ This Table provides schedule only and is not considered a part of the LAR submittal.

NOTE: South Texas Project's submittal will be at a later date to be coordinated with their project manager.