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Ref: 10CFR50.90  
10CFR50.36

CPSES-200003020  
Log # TXX-00224  
File # 10010, 916 (3.7)

December 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**  
**IMPLEMENTATION OF LICENSE AMENDMENT 74**  
**(TAC NOS. MA4841 and MA4842)**

- REF: 1) TXU Electric Letter, logged TXX-00114, from C. L. Terry to the NRC dated May 30, 2000  
2) TXU Electric Letter, logged TXX-00144, from C. L. Terry to the NRC dated October 4, 2000

Gentlemen:

On February 24, 2000, the NRC issued Amendment 74 to Facility Operating License No. NPF-87 and Amendment 74 to Facility Operating License No. NPF-89 for Comanche Peak Steam Electric Station, Units 1 and 2 respectively (TAC Nos MA4841 and MA4842). Amendment 74 changed the Technical Specifications to authorize an increase in the allowable spent fuel storage capacity and the crediting of soluble boron, in the spent fuel pool, for spent fuel reactivity control.

On May 30, 2000, by Reference 1, TXU Electric requested that the implementation date of June 30, 2000, for License Amendment 74 be extended until December 31, 2000. On June 12, 2000, the NRC issued License Amendment 78 (TAC NOS. MA7188 and MA7189) which extended the implementation date for License Amendment 74 until December 31, 2000.

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Reference 1 stated in part,

This request is necessitated by issues which remain unresolved regarding potential non-conservatism in the associated criticality analyses for License Amendment 74. In March 2000, based on preliminary investigations, Duke Power notified the NRC/Industry of potential non-conservatisms in Westinghouse's current licensed and approved methodology regarding the axial burnup bias on spent fuel criticality analyses. A delay in the implementation date of License Amendment 74 will allow additional time for TXU Electric to address/evaluate the effect (if any) this issue will have on the spent fuel storage curves as approved by License Amendment 74.

TXU Electric's assessment of the industry issue regarding non-conservatisms in the criticality analysis has concluded that administrative restrictions to the Technical Specification curves are necessary. Specifically, more restrictive storage curves are required for the all cell storage configuration (TS Figure 3.7.17-1) and the 3 out of 4 storage configuration (TS Figure 3.7.17-2). The administrative restrictions for the all cell and the 3 out of 4 storage configurations will be located in procedure RFO-106. Comanche Peak's corrective action program has initiated a document (SMF-2000-001062-00) for this condition.

In a separate action License Amendment Request 00-005 was submitted to the NRC on October 4, 2000, (Reference 2) to revise Technical Specification 3.7.17. A supplement to LAR 00-005 will be submitted early in 2001 to address the non-conservatisms in the criticality analysis. Upon NRC approval and TXU Electric's implementation of LAR 00-005, the administrative restrictions will no longer be necessary.

License Amendment 74 will be implemented at 12:01 AM on December 31, 2000. A change to Technical Specification Bases 3.7.17 will also be effective concurrently with License Amendment 74. The Technical Specification Bases change will note that administrative restrictions are required for the Technical Specification spent fuel storage curves.

This communication contains the following new commitment which will be completed as noted:

<u>ACL #</u>	<u>Commitment</u>
00-092	A supplement to LAR 00-005 will be submitted early in 2001 to address the non-conservatisms in the criticality analysis.

<u>Commitment #</u>	<u>Commitment</u>
27213	Administrative restrictions will be implemented for the spent fuel storage curves in Technical Specification 3.7.17. Specifically, more restrictive storage curves are required for the all cell storage configuration (TS Figure 3.7.17-1) and the 3 out of 4 storage configuration (TS Figure 3.7.17-2). The administrative restrictions for the all cell and the 3 out of 4 storage configurations will be located in procedure RFO-106. The administrative restrictions will no longer be necessary upon NRC approval and TXU Electric implementation of License Amendment Request 00-005.

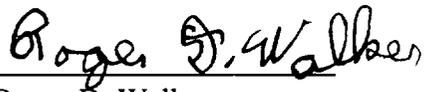
The ACL (Action Correspondence Log) number is used by TXU Electric for the internal tracking of CPSES one time action requirements.

The Commitment number is used by TXU Electric for the internal tracking of CPSES commitments.

If you have any questions please contact Carl Corbin at (254) 897-0121.

Sincerely,

C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

CBC/cbc

Attachment

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

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)		
	)		
TXU Electric Company	)	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 letter regarding License Amendment 74; 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 12-14-06*  
\_\_\_\_\_  
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 December, 2000.

*Gayle R. Peck Jepperson*  
\_\_\_\_\_  
Notary Public

