TXU Electric
Comanche Peak
Steam Electric Station
P.O. Box 1002
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lterry1@txu.com

C. Lance Terry
Senior Vice President & Principal Nuclear Officer

Ref: 10CFR50.90

CPSES-200002406
Log # TXX-01040
File # 00236, 10010 (clo)

April 3, 2001

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) 01-04
REVISION TO TECHNICAL SPECIFICATION (TS) 3.3.6
CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION

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

The proposed change will revise TS 3.3.6, "Containment Ventilation Isolation Instrumentation" to modify the Note for Required Action B.1 such that it applies only to "Required Action and associated Completion Time of Condition A not met."

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 proposed changes to the Technical Specification Bases for information only. These changes will be processed per the Technical Specification 5.5.14, "Bases Control Program." Attachment 5 provides retyped Technical Specification pages which incorporate the requested changes. Attachment 6 provides retyped Technical Specification Bases pages which incorporate the proposed changes.

D029

TXU Electric
P.O. Box 1002
Glen Rose, TX 76043

TXU Electric requests approval of the proposed License Amendment by 4/30/2002 to be implemented within 60 days of the issuance of the license. 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

Roger D. Walker
Regulatory Affairs Manager

BSD/bsd
Attachments
1. Affidavit
2. Description and Assessment
3. Markup of Technical Specifications pages
4. Markup of Technical Specifications Bases pages (for information)
5. Retyped Technical Specification Pages
6. Retyped Technical Specification Bases Pages (for information)

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

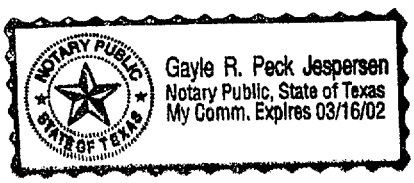
Roger D. Walker being duly sworn, hereby deposes and says that he is the Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 01-04; that he is familiar with the content thereof; 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 3rd day of April, 2001.

Notary Public



ATTACHMENT 2 to TXX-01040

DESCRIPTION AND ASSESSMENT

Description and Assessment

1.0 INTRODUCTION

1.1 Proposed change LAR-00-07 is a request to revise Technical Specifications (TS) 3.3.6, "Containment Ventilation Isolation Instrumentation" for Comanche Peak Steam Electric Station (CPSES) Units 1 and 2.

1.2 FINAL SAFETY ANALYSIS REPORT (FSAR) SECTION

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 3.3.6, "Containment Ventilation Isolation Instrumentation" to modify the note for Required Action B.1 such that it applies only to "Required Action and associated Completion Time of Condition A not met."

3.0 BACKGROUND

TS 3.3.6, Condition B applies to two situations. The first one deals with "One or more Automatic Actuation Logic and Actuation Relays trains inoperable" and the second deals with "Required Action and associated Completion Time of Condition A not met." A note in Required Action B.1 allows the containment pressure relief valves, which are closed per the Required Actions, to be opened in compliance with the gaseous effluent monitoring instrumentation requirements in Part I of the ODCM. During the conversion to the improved TS format the note was incorrectly applied to both these situations whereas it should only apply to "Required Actions and associated Completion Time of Condition A not met." Condition A applies to the radiation monitor channel being inoperable. Upon discovery of this non-conservative specification, interim administrative controls were initiated to preclude the incorrect application of the note in accordance with the guidance provided in NRC Administrative letter 98-010. This proposed license amendment request corrects the technical specifications.

A description of the Containment Pressure Relief system design can be found in FSAR Section 9.4A. The accident analyses assumptions associated with the system can be found in FSAR Sections 6.2.4.1 and 15.6.

4.0 TECHNICAL ANALYSIS

Containment ventilation isolation instrumentation closes the containment isolation valves in the Containment Purge, Hydrogen Purge, and Containment Pressure Relief Systems. This action isolates the containment atmosphere from the environment to minimize releases of radioactivity in the event of an accident. The Containment Pressure Relief System may be in use during reactor operation.

Containment ventilation isolation initiates on an automatic or manual safety injection (SI) signal through the Containment Isolation — Phase A Function, or by manual actuation of Phase A Isolation, or by manual actuation of Containment Spray. One containment radiation monitor is also provided as input to the containment ventilation isolation. The monitor samples the containment atmosphere and upon detection of high radiation level initiates containment ventilation isolation. The Containment Pressure Relief system has inner and outer containment isolation valves on its containment penetration flow path. A high radiation signal initiates containment ventilation isolation, which closes both inner and outer containment isolation valves.

Condition A applies when the radiation monitor channel is inoperable. However, there is no credit taken for containment isolation by the radiation monitor in the accident analyses. Thus the note allowing the containment pressure relief valves to be opened under administrative controls is consistent with the licensing basis.

The safety analyses for LOCA assume that the containment remains intact with penetrations unnecessary for core cooling isolated early in the event. Containment pressure relief is assumed to be isolated within 5 seconds of Pressurizer Pressure Low for LOCA. The LCO requires two trains of Automatic Actuation Logic and Actuation Relays to be operable to ensure that no single failure can prevent automatic actuation. Containment isolation in turn ensures meeting the containment leakage rate assumptions of the safety analyses, and ensures that the calculated accidental offsite radiological doses are below 10 CFR 100 limits. Since the safety analyses require the automatic closure of the containment pressure relief valves in the event of a LOCA, it is not appropriate to allow opening of the valves under administrative controls when their automatic closure function is degraded. Because this change restores the technical specifications to be consistent with current design and analyses in the FSAR, TXU Electric concludes that the change is safe and acceptable.

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 proposed change removes an allowance to open containment pressure relief valves under administrative controls when one train of Automatic Actuation Logic and Actuation Relays is inoperable. The proposed change corrects a non-conservative technical specification and thus makes the technical specifications consistent with the previously evaluated accident analyses. Therefore, the proposed change does 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 change makes the technical specifications consistent with the previously evaluated accident analyses. 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 proposed change makes the technical specifications consistent with the previously evaluated accident analyses. 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

1) General Design Criterion (GDC) 16 - Containment Design - "Reactor containment and associated systems shall be provided to establish an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment and to assure that the containment design conditions important to safety are not exceeded for as long as postulated accident conditions require."

2) Doses limits of 10CFR100

TS 3.3.6 assures that the requirements of GDC-16 for the containment integrity associated with Containment Ventilation is maintained and that 10CFR100 dose limits will be met in the event of a LOCA.

Analysis

The proposed change to TS 3.3.6 corrects a non-conservative technical specification by making the technical specifications consistent with the previously evaluated accident analyses (see FSAR Section 6.2.4.1 and 15.6) such that releases are maintained within the 10CFR100 dose limits in the event of a LOCA.

Conclusion

The technical analysis performed by TXU Electric assures that the GDC-16 containment integrity associated with containment ventilation isolation is maintained such that the 10CFR100 dose limits will met in the event of a LOCA. The proposed change continues to be compliant with the above regulatory requirements.

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-01040

MARKUP OF TECHNICAL SPECIFICATION PAGE

Page 3.3-48

3.3 INSTRUMENTATION

3.3.6 Containment Ventilation Isolation Instrumentation

LCO 3.3.6 The Containment Ventilation Isolation instrumentation for each Function in Table 3.3.6-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.6-1

ACTIONS

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

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One radiation monitoring channel inoperable.	A.1 Restore the affected channel to OPERABLE status.	4 hours
B. ----------NOTE---------- Only applicable in MODE 1, 2, 3, or 4. --- One or more Automatic Actuation Logic and Actuation Relays trains inoperable. OR Required Action and associated Completion Time of Condition A not met.	----------NOTE---------- For Required Action and associated Completion Time of Condition A not met, the containment pressure relief valves may be opened in compliance with the gaseous effluent monitoring instrumentation requirements in Part I of the ODCM. --- B.1 Enter applicable Conditions and Required Actions of LCO 3.6.3, "Containment Isolation Valves," for containment ventilation isolation valves made inoperable by isolation instrumentation.	Immediately

(Continued)

ATTACHMENT 4 to TXX-01040

MARKUP OF TECHNICAL SPECIFICATION BASES PAGES
(For Information Only)

Page B 3.3-165

BASES

ACTIONS

B.1 (continued)

If a train is inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action for the applicable Conditions of LCO 3.6.3 is met for each valve made inoperable by failure of isolation instrumentation.

A Note is added to allow the containment pressure relief valves closed per this REQUIRED ACTION to be opened in compliance with the gaseous effluent monitoring instrumentation requirements in Part I of the ODCM for Required Action and associated Completion Time of Condition A not met only.

A Note is added stating that Condition B is only applicable in MODE 1, 2, 3, or 4.

C.1 and C.2

Condition C applies to the inability to restore the radiation monitoring channel to OPERABLE status in the time allowed for Required Action A.1. If the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action to place and maintain containment ventilation isolation valves in their closed position is met or the applicable Conditions of LCO 3.9.4, "Containment Penetrations," are met for each valve made inoperable by failure of isolation instrumentation. A note allows the containment pressure relief valves to be opened in compliance with gaseous effluent monitoring instrumentation requirements in Part I of the ODCM. The Completion Time for these Required Actions is Immediately.

A Note states that Condition C is applicable during CORE ALTERATIONS and during movement of irradiated fuel assemblies within containment.

(continued)

ATTACHMENT 5 to TXX-01040

RETYPED TECHNICAL SPECIFICATION PAGES

Page 3.3-48

3.3 INSTRUMENTATION

3.3.6 Containment Ventilation Isolation Instrumentation

LCO 3.3.6 The Containment Ventilation Isolation instrumentation for each Function in Table 3.3.6-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.6-1

ACTIONS

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

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One radiation monitoring channel inoperable.	A.1 Restore the affected channel to OPERABLE status.	4 hours
B. ---NOTE--- Only applicable in MODE 1, 2, 3, or 4. --- One or more Automatic Actuation Logic and Actuation Relays trains inoperable. OR Required Action and associated Completion Time of Condition A not met.	---NOTE--- For Required Action and associated Completion Time of Condition A not met, the containment pressure relief valves may be opened in compliance with the gaseous effluent monitoring instrumentation requirements in Part I of the ODCM. --- B.1 Enter applicable Conditions and Required Actions of LCO 3.6.3, "Containment Isolation Valves," for containment ventilation isolation valves made inoperable by isolation instrumentation.	Immediately

(Continued)

ATTACHMENT 6 to TXX-01040

RETYPED TECHNICAL SPECIFICATION BASES PAGES
(For Information Only)

Page B 3.3-165

BASES

ACTIONS

B.1 (continued)

If a train is inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action for the applicable Conditions of LCO 3.6.3 is met for each valve made inoperable by failure of isolation instrumentation.

A Note is added to allow the containment pressure relief valves closed per this REQUIRED ACTION to be opened in compliance with the gaseous effluent monitoring instrumentation requirements in Part I of the ODCM for Required Action and associated Completion Time of Condition A not met only.

A Note is added stating that Condition B is only applicable in MODE 1, 2, 3, or 4.

C.1 and C.2

Condition C applies to the inability to restore the radiation monitoring channel to OPERABLE status in the time allowed for Required Action A.1. If the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action to place and maintain containment ventilation isolation valves in their closed position is met or the applicable Conditions of LCO 3.9.4, "Containment Penetrations," are met for each valve made inoperable by failure of isolation instrumentation. A note allows the containment pressure relief valves to be opened in compliance with gaseous effluent monitoring instrumentation requirements in Part I of the ODCM. The Completion Time for these Required Actions is Immediately.

A Note states that Condition C is applicable during CORE ALTERATIONS and during movement of irradiated fuel assemblies within containment.

(continued)