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Ref: 10CFR50.90

CPSES-200201678
Log # TXX-02081
File # 00236
10010

April 23, 2002

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
SUPPLEMENT 1 LICENSE AMENDMENT REQUEST (LAR) 02-02
REVISION TO TECHNICAL SPECIFICATION (TS) 3.7.3
FEEDWATER ISOLATION VALVES**

REF: TXU Energy Letter logged TXX-02010, dated March 25, 2002, from
C. L. Terry to the NRC

Gentlemen:

In the referenced letter, TXU Generation Company LP (TXU Energy) transmitted License Amendment Request (LAR) 02-02 concerning a proposed change to adopt the NUREG-1431, Standard Technical Specifications for Westinghouse Plants, Revision 2 version of TS 3.7.3. In addition, LAR 02-02 included an administrative change to delete a footnote in TS 3.7.3 which was no longer applicable. The administrative change was addressed in Section 2.0 of the Licensee's Evaluation but was not addressed in Section 5.1, No Significant Hazards Determination.

Supplement 1 to LAR 02-02 provides a revised Section 5.1 that includes the administrative change. Please replace Section 5.1 of the original LAR transmittal with the Section 5.1 contained in this supplement.

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In accordance with 10CFR50.91(b), TXU Energy is providing the State of Texas with a copy of this proposed amendment.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Should you have any questions, please contact Mr. Bob Dacko at (254) 897-0122 or e-mail bdacko1@txu.com.

I state under penalty of perjury that the foregoing is true and correct.

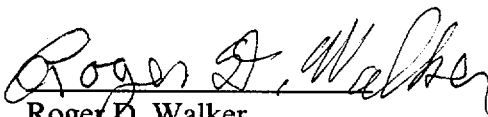
Executed on April 23, 2002.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

C. L. Terry
Senior Vice President and Principal Nuclear Officer

By: 
Roger D. Walker
Regulatory Affairs Manager

BSD/bsd
Attachment

c - E. W. Merschoff, Region IV
W. D. Johnson, 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

5.1 No significant Hazards Determination

TXU Generation Company LP 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 extends the Completion Time for one or more Feedwater Isolation Valves (FIVs) inoperable from 4 hours to 72 hours. Extending the Completion Time is not an accident initiator and thus does not change the probability that an accident will occur. However, it could potentially affect the consequences of an accident if an accident occurred during the extended unavailability of the inoperable FIV. The increase in time that the FIV is unavailable is small and the probability of an event occurring during this time period which would require isolation of the Main Feedwater flow paths is low. Moreover, the redundancy provided by the Feedwater Control Valves, which have same actuation signals and closure time requirements as the FIVs, provides adequate assurance that automatic feedwater isolation will occur if called upon.

The deletion of the footnote which is no longer applicable is an administrative change and does not affect the probability or consequences of an accident previously evaluated.

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

Closure of the FIVs is required to mitigate the consequences of a Main Steam Line Break and Main Feedwater Line Break accidents. The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The deletion of the footnote which is no longer applicable is an administrative change and does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

The proposed changes do not change any Technical Specification Limit or accident analysis assumption. Therefore they do not involve a reduction in a margin of safety.

Based on the above evaluations, TXU Generation Company LP 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.