

December 15, 1995

Mr. C. Lance Terry  
Group Vice President, Nuclear  
TU Electric  
Energy Plaza  
1601 Bryan Street, 12th Floor  
Dallas, TX 75201-3411

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT  
NOS. 44 AND 30 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89  
(TAC NOS. M93666 AND M93667)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 44 and 30 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station, Units 1 and 2. The amendments consist of changes to the TS (TSs) in response to your application dated August 15, 1995 (TX-95215).

These amendments move the Shutdown Margin limits from the TSs to the Core Operating Limits Report. The proposed changes are consistent with the intent of Generic Letter (GL) 88-16 which provides guidelines for the removal of cycle-specific parameter limits from the TSs.

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original Signed By:  
Timothy J. Polich, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

- Enclosures: 1. Amendment No. 44 to NPF-87
- 2. Amendment No. 30 to NPF-89
- 3. Safety Evaluation

cc w/encls: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 15, 1995

Mr. C. Lance Terry  
Group Vice President, Nuclear  
TU Electric  
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1601 Bryan Street, 12th Floor  
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SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT  
NOS. 44 AND 30 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89  
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Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 44 and 30 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated August 15, 1995 (TXX-95215).

These amendments move the Shutdown Margin limits from the TSs to the Core Operating Limits Report. The proposed changes are consistent with the intent of Generic Letter (GL) 88-16 which provides guidelines for the removal of cycle-specific parameter limits from the TSs.

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script, appearing to read "Timothy J. Polich".

Timothy J. Polich, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosures: 1. Amendment No. 44 to NPF-87  
2. Amendment No. 30 to NPF-89  
3. Safety Evaluation

cc w/encls: See next page

Mr. C. Lance Terry  
TU Electric Company

Comanche Peak, Units 1 and 2

cc:  
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U.S. Nuclear Regulatory Commission  
P. O. Box 1029  
Granbury, TX 76048

Honorable Dale McPherson  
County Judge  
P. O. Box 851  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

TEXAS UTILITIES ELECTRIC COMPANY  
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1  
DOCKET NO. 50-445  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 44  
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated August 15, 1995 (TXX-95215), complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-87 is hereby amended to read as follows:

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P PDR

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 44, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy J. Polich, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: December 15, 1995



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

TEXAS UTILITIES ELECTRIC COMPANY  
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 2  
DOCKET NO. 50-446  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 30  
License No. NPF-89

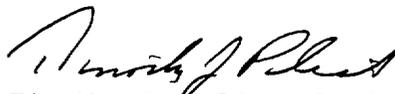
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated August 15, 1995 (TXX-95215), complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-89 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 30, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TU Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Timothy J. Polich, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: December 15, 1995

ATTACHMENT TO LICENSE AMENDMENT NOS. 44 AND 30

FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89

DOCKET NOS. 50-445 AND 50-446

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

3/4 1-1  
3/4 1-3  
3/4 1-8  
3/4 1-10  
3/4 1-13  
B 3/4 1-1  
B 3/4 1-2  
B 3/4 1-3  
6-20  
6-21  
6-21a

INSERT

3/4 1-1  
3/4 1-3  
3/4 1-8  
3/4 1-10  
3/4 1-13  
B 3/4 1-1  
B 3/4 1-2  
B 3/4 1-3  
6-20  
6-21  
6-21a

### 3/4.1. REACTIVITY CONTROL SYSTEMS

#### 3/4.1.1 BORATION CONTROL

SHUTDOWN MARGIN -  $T_{avg}$  GREATER THAN 200°F

#### LIMITING CONDITION FOR OPERATION

---

3.1.1.1 The SHUTDOWN MARGIN shall be greater than or equal to the value specified in the Core Operating Limits Report (COLR).

APPLICABILITY: MODES 1, 2\*, 3, and 4.

ACTION:

With the SHUTDOWN MARGIN less than the value specified in the COLR, immediately initiate and continue boration at greater than or equal to 30 gpm of a solution containing greater than or equal to 7,000 ppm boron or equivalent until the required SHUTDOWN MARGIN is restored.

#### SURVEILLANCE REQUIREMENTS

---

4.1.1.1.1 The SHUTDOWN MARGIN shall be determined to be greater than or equal to the value specified in the COLR:

- a. Within 1 hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. If the inoperable control rod is immovable or untrippable, the above required SHUTDOWN MARGIN shall be verified acceptable with an increased allowance for the withdrawn worth of the immovable or untrippable control rod(s);
- b. When in MODE 1 or MODE 2 with  $K_{off}$  greater than or equal to 1 at least once per 12 hours by verifying that control bank withdrawal is within the limits of Specification 3.1.3.6;
- c. When in MODE 2 with  $K_{off}$  less than 1, within 4 hours prior to achieving reactor criticality by verifying that the predicted critical control rod position is within the limits of Specification 3.1.3.6;
- d. Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of Specification 4.1.1.1.e. below, with the control banks at the maximum insertion limit of Specification 3.1.3.6; and

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\*See Special Test Exceptions Specification 3.10.1.

## REACTIVITY CONTROL SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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- e. When in MODE 3 or 4, at least once per 24 hours by consideration of the following factors:
- 1) Reactor Coolant System boron concentration,
  - 2) Control rod position,
  - 3) Reactor Coolant System average temperature,
  - 4) Fuel burnup based on gross thermal energy generation,
  - 5) Xenon concentration, and
  - 6) Samarium concentration.

4.1.1.1.2 The overall core reactivity balance shall be compared to predicted values to demonstrate agreement within  $\pm 1\% \Delta k/k$  at least once per 31 Effective Full Power Days (EFPD). This comparison shall consider at least those factors stated in Specification 4.1.1.1.e., above. The predicted reactivity values shall be adjusted (normalized) to correspond to the actual core conditions prior to exceeding a fuel burnup of 60 EFPD after each fuel loading.

## REACTIVITY CONTROL SYSTEMS

SHUTDOWN MARGIN -  $T_{avg}$  LESS THAN OR EQUAL TO 200°F

### LIMITING CONDITION FOR OPERATION

---

3.1.1.2 The SHUTDOWN MARGIN shall be greater than or equal to the value specified in the Core Operating Limits Report (COLR).

APPLICABILITY: MODE 5.

ACTION:

With the SHUTDOWN MARGIN less than the value specified in the COLR, immediately initiate and continue boration at greater than or equal to 30 gpm of a solution containing greater than or equal to 7,000 ppm boron or equivalent until the required SHUTDOWN MARGIN is restored.

### SURVEILLANCE REQUIREMENTS

---

4.1.1.2 The SHUTDOWN MARGIN shall be determined to be greater than or equal to the value specified in the COLR:

- a. Within 1 hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. If the inoperable control rod is immovable or untrippable, the SHUTDOWN MARGIN shall be verified acceptable with an increased allowance for the withdrawn worth of the immovable or untrippable control rod(s); and
- b. At least once per 24 hours by consideration of the following factors:
  - 1) Reactor Coolant System boron concentration,
  - 2) Control rod position,
  - 3) Reactor Coolant System average temperature,
  - 4) Fuel burnup based on gross thermal energy generation,
  - 5) Xenon concentration, and
  - 6) Samarium concentration.

## REACTIVITY CONTROL SYSTEMS

### MODERATOR TEMPERATURE COEFFICIENT

#### LIMITING CONDITION FOR OPERATION

---

3.1.1.3 The moderator temperature coefficient (MTC) shall be within the limits specified in the CORE OPERATING LIMITS REPORT (COLR). The maximum upper limit shall be less than or equal to  $+0.5 \times 10^{-4} \Delta k/k/^{\circ}F$  for power levels up to 70% RATED THERMAL POWER with a linear ramp to 0  $\Delta k/k/^{\circ}F$  at 100% RATED THERMAL POWER.

APPLICABILITY: Beginning of Cycle Life (BOL) limit - MODES 1 and 2\* only\*\*.  
End of Cycle Life (EOL) limit - MODES 1, 2, and 3 only\*\*.

ACTION:

- a. With the MTC more positive than the BOL limit specified in the COLR, operation in MODES 1 and 2 may proceed provided:
  1. Control rod withdrawal limits are established and maintained sufficient to restore the MTC to less positive than the BOL limit specified in the COLR within 24 hours or be in HOT STANDBY within the next 6 hours. These withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6;
  2. The control rods are maintained within the withdrawal limits established above until a subsequent calculation verifies that the MTC has been restored to within its limit for the all rods withdrawn condition; and
  3. A Special Report is prepared and submitted to the Commission, pursuant to Specification 6.9.2, within 10 days, describing the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.
- b. With the MTC more negative than the EOL limit specified in the COLR, be in HOT SHUTDOWN within 12 hours.

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\*With  $K_{eff}$  greater than or equal to 1.

\*\*See Special Test Exceptions Specification 3.10.3.

## REACTIVITY CONTROL SYSTEMS

### FLOW PATHS - OPERATING

#### LIMITING CONDITION FOR OPERATION

---

3.1.2.2 At least two of the following three boron injection flow paths shall be OPERABLE:

- a. The flow path from the boric acid storage tanks via either a boric acid transfer pump or a gravity feed connection and a charging pump to the Reactor Coolant System (RCS), and
- b. Two flow paths from the refueling water storage tank via centrifugal charging pumps to the RCS.

APPLICABILITY: MODES 1, 2, 3, and 4.\*

#### ACTION:

With only one of the above required boron injection flow paths to the RCS OPERABLE, restore at least two boron injection flow paths to the RCS to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least the value specified in the COLR at 200°F within the next 6 hours; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.1.2.2 At least two of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that the temperature of the flow path from the boric acid storage tanks is greater than or equal to 65°F when it is a required water source;
- b. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position; and
- c. At least once per 18 months by verifying that the flow path required by Specification 3.1.2.2a. delivers at least 30 gpm to the RCS.

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\*A maximum of two charging pumps shall be OPERABLE whenever the temperature of one or more of the RCS cold legs is less than or equal to 350°F except when Specification 3.4.8.3 is not applicable. An inoperable pump may be energized for testing provided the discharge of the pump has been isolated from the RCS by a closed isolation valve(s) with power removed from the valve operator(s) or by a manual isolation valve(s) secured in the closed position.

## REACTIVITY CONTROL SYSTEMS

### 3/4.1.2 BORATION SYSTEMS

#### FLOW PATH - SHUTDOWN

#### LIMITING CONDITION FOR OPERATION

---

3.1.2.1 As a minimum, one of the following boron injection flow paths shall be OPERABLE and capable of being powered from an OPERABLE emergency power source:

- a. A flow path from the boric acid storage tanks via either a boric acid transfer pump or a gravity feed connection and a charging pump to the Reactor Coolant System if the boric acid storage tank in Specification 3.1.2.5a. is OPERABLE, or
- b. The flow path from the refueling water storage tank via a centrifugal charging pump to the Reactor Coolant System if the refueling water storage tank in Specification 3.1.2.5b. is OPERABLE.

APPLICABILITY: MODES 5 and 6.

#### ACTION:

With none of the above flow paths OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

#### SURVEILLANCE REQUIREMENTS

---

4.1.2.1 At least one of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that the temperature of the flow path is greater than or equal to 65°F when a flow path from the boric acid storage tanks is used, and
- b. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

## REACTIVITY CONTROL SYSTEMS

### CHARGING PUMPS - OPERATING

#### LIMITING CONDITION FOR OPERATION

---

3.1.2.4 At least two centrifugal charging pumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3\*, and 4\* \*\*.

ACTION:

With only one charging pump OPERABLE, restore at least two charging pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least the value specified in the COLR at 200°F within the next 6 hours; restore at least two charging pumps to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

#### SURVEILLANCE REQUIREMENTS

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4.1.2.4.1 The required centrifugal charging pump(s) shall be demonstrated OPERABLE by testing pursuant to Specification 4.0.5.

4.1.2.4.2 The required positive displacement charging pump shall be demonstrated OPERABLE by testing pursuant to Specification 4.1.2.2.c.

4.1.2.4.3 Whenever the temperature of one or more of the Reactor Coolant System (RCS) cold legs is less than or equal to 350°F, a maximum of two charging pumps shall be OPERABLE, except when Specification 3.4.8.3 is not applicable.

When required, one charging pump shall be demonstrated inoperable<sup>#</sup> at least once per 31 days by verifying that the motor circuit breakers are secured in the open position.

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\*The provisions of Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODES 3 and 4 for the charging pump declared inoperable pursuant to Specification 3.1.2.4 provided the charging pump is restored to OPERABLE status within 4 hours after entering MODE 3 or prior to the temperature of one or more of the RCS cold legs exceeding 375°F, whichever comes first.

\*\*In MODE 4 the positive displacement pump may be used in lieu of one of the required centrifugal charging pumps.

<sup>#</sup>An inoperable pump may be energized for testing provided the discharge of the pump has been isolated from the RCS by a closed isolation valve(s) with power removed from the valve operator(s) or by a manual isolation valve(s) secured in the closed position.

## REACTIVITY CONTROL SYSTEMS

### CHARGING PUMP - SHUTDOWN

#### LIMITING CONDITION FOR OPERATION

---

3.1.2.3 At least one charging pump in the boron injection flow path required by Specification 3.1.2.1 shall be OPERABLE and capable of being powered from an OPERABLE emergency power source.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no charging pump OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

#### SURVEILLANCE REQUIREMENTS

---

4.1.2.3.1 At least once per 92 days the above required positive displacement charging pump shall be demonstrated OPERABLE by verifying that the flow path required by Specification 3.1.2.1a. is capable of delivering at least 30 gpm to the RCS; or

4.1.2.3.2 The above required centrifugal charging pump shall be demonstrated OPERABLE by verifying, on recirculation flow, that a differential pressure across the pump of greater than or equal to 2370 psid is developed when tested pursuant to Specification 4.0.5.

4.1.2.3.3 A maximum of two charging pumps shall be OPERABLE, one charging pump shall be demonstrated inoperable\* at least once per 31 days, except when the reactor vessel head is removed, by verifying that the motor circuit breakers are secured in the open position.

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\*An inoperable pump may be energized for testing provided the discharge of the pump has been isolated from the RCS by a closed isolation valve(s) with power removed from the valve operator(s) or by a manual isolation valve(s) secured in the closed position.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 As a minimum, the following borated water source(s) shall be OPERABLE as required by Specification 3.1.2.2:

- a. A boric acid storage tank with:
  - 1) A minimum indicated borated water level of 50%,
  - 2) A minimum boron concentration of 7000 ppm, and
  - 3) A minimum solution temperature of 65°F.
- b. The refueling water storage tank (RWST) with:
  - 1) A minimum indicated borated water level of 95%,
  - 2) A boron concentration between 2400 ppm and 2600 ppm,
  - 3) A minimum solution temperature of 40°F, and
  - 4) A maximum solution temperature of 120°F.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the boric acid storage tank inoperable and being used as one of the above required borated water sources, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least the value specified in the COLR at 200°F; restore the boric acid storage tank to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the RWST inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

## REACTIVITY CONTROL SYSTEMS

### SURVEILLANCE REQUIREMENTS

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- 4.1.2.6 Each borated water source shall be demonstrated OPERABLE:
- a. At least once per 7 days by:
    - 1) Verifying the boron concentration in the water,
    - 2) Verifying the indicated borated water level of the water source, and
    - 3) Verifying the boric acid storage tank solution temperature when it is the source of borated water.
  - b. At least once per 24 hours by verifying the RWST temperature when the outside air temperature is either less than 40°F or greater than 120°F.

## 3/4.1 REACTIVITY CONTROL SYSTEMS

### BASES

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#### 3/4.1.1 BORATION CONTROL

##### 3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN

A sufficient SHUTDOWN MARGIN ensures that: (1) the reactor can be made subcritical from all operating conditions, (2) the reactivity transients associated with postulated accident conditions are controllable within acceptable limits, and (3) the reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

SHUTDOWN MARGIN requirements vary throughout core life as a function of fuel depletion, RCS boron concentration, and RCS  $T_{avg}$ . The most restrictive condition occurs at EOL, with  $T_{avg}$  at no load operating temperature, and is associated with a postulated steam line break accident and resulting uncontrolled RCS cooldown. In the analysis of this accident, a minimum SHUTDOWN MARGIN (as specified in the COLR) is required to control the reactivity transient when  $T_{avg}$  is above 200°F. Accordingly, the SHUTDOWN MARGIN requirement is based upon this limiting condition and is consistent with FSAR safety analysis assumptions. With  $T_{avg}$  less than 200°F, the required SHUTDOWN MARGIN is based on the results of the boron dilution accident analysis.

Since the actual overall core reactivity balance comparison required by 4.1.1.1.2 cannot be performed until after criticality is attained, this comparison is not required (and the provisions of Specification 4.0.4 are not applicable) for entry into any Operational Mode within the first 31 EFPD following initial fuel load or refueling.

##### 3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT

The limitations on moderator temperature coefficient (MTC) are provided to ensure that the value of this coefficient remains within the limiting condition assumed in the FSAR accident and transient analyses.

The MTC values of this specification are applicable to a specific set of plant conditions; accordingly, verification of MTC values at conditions other than those explicitly stated will require extrapolation to those conditions in order to permit an accurate comparison.

The most negative MTC value equivalent to the most positive moderator density coefficient (MDC) was obtained by incrementally correcting the MDC used in the FSAR analyses to nominal operating conditions. These corrections

## REACTIVITY CONTROL SYSTEMS

### BASES

#### MODERATOR TEMPERATURE COEFFICIENT (Continued)

involved subtracting the incremental change in the MDC associated with a core condition of all rods inserted (most positive MDC) to an all rods withdrawn condition and, a conversion for the rate of change of moderator density with temperature at RATED THERMAL POWER conditions. This value of the MDC was then transformed into the limiting End of Cycle Life (EOL) MTC value. The 300 ppm surveillance limit MTC value represents a conservative value (with corrections for burnup and soluble boron) at a core condition of 300 ppm equilibrium boron concentration and is obtained by making these corrections to the limiting EOL MTC value.

The Surveillance Requirements for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits since this coefficient changes slowly due principally to the reduction in RCS boron concentration associated with fuel burnup.

#### 3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 551°F. This limitation is required to ensure: (1) the moderator temperature coefficient is within its analyzed temperature range, (2) the trip instrumentation is within its normal operating range, (3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and (4) the reactor vessel is above its minimum  $RT_{NDT}$  temperature.

#### 3/4.1.2 BORATION SYSTEMS

The Boron Injection System ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include: (1) borated water sources, (2) charging pumps, (3) separate flow paths, (4) boric acid transfer pumps, and (5) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two boron injection flow paths are required to ensure single functional capability in the event an assumed failure renders one of the flow paths inoperable. The boration capability of either flow path is sufficient to provide the required SHUTDOWN MARGIN from expected operating conditions after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 15,700 gallons of 7000 ppm borated water from the boric acid storage tanks or 70,702 gallons of 2400 ppm borated water from the refueling water storage tank (RWST).

## REACTIVITY CONTROL SYSTEMS

### BASES

#### BORATION SYSTEMS (Continued)

With the RCS temperature below 200°F, one Boron Injection System is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single Boron Injection System becomes inoperable.

The limitation for a maximum of two charging pumps to be OPERABLE and the requirement to verify one charging pump to be inoperable below 350°F provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV.

The limitation for minimum solution temperature of the borated water sources are sufficient to prevent boric acid crystallization with the highest allowable boron concentration.

The boron capability required below 200°F is sufficient to provide the required SHUTDOWN MARGIN after xenon decay and cooldown from 200°F to 140°F. This condition requires either 1,100 gallons of 7000 ppm borated water from the boric acid storage tanks or 7,113 gallons of 2400 ppm borated water from the RWST.

As listed below, the required indicated levels for the boric acid storage tanks and the RWST include allowances for required/analytical volume, unusable volume, measurement uncertainties (which include instrument error and tank tolerances, as applicable), margin, and other required volume.

Tank	MODES	Ind. Level	Unusable Volume (gal)	Required Volume (gal)	Measurement Uncertainty	Margin (gal)	Other (gal)
RWST	5,6	24%	98,900	7,113	4% of span	10,293	N/A
	1,2,3,4	95%	45,494	70,702	4% of span	N/A	357,535*
Boric Acid Storage Tank	5,6	10%	3,221	1,100	6% of span	N/A	N/A
	5,6 (gravity feed)	20%	3,221	1,100	6% of span	3,679	N/A
	1,2,3,4	50%	3,221	15,700	6% of span	N/A	N/A

The OPERABILITY of one Boron Injection System during REFUELING ensures that this system is available for reactivity control while in MODE 6.

\*Additional volume required to meet Specification 3.5.4.

COMANCHE PEAK - UNITS 1 AND 2

B 3/4 1-3

Unit 1 - Amendment No. 5,19,26,44  
Unit 2 - Amendment No. 5,12,30

## REACTIVITY CONTROL SYSTEMS

### BASES

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#### 3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that: (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) the potential effects of rod misalignment on associated accident analyses are limited. OPERABILITY of the control rod position indicators is required to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits. Verification that the Digital Rod Position Indicator agrees with the demanded position within  $\pm 12$  steps at 24, 48, 120, and 228 steps withdrawn for the Control Banks and 18, 210, and 228 steps withdrawn for the Shutdown Banks provides assurances that the Digital Rod Position Indicator is operating correctly over the full range of indication. Since the Digital Rod Position Indication System does not indicate the actual shutdown rod position between 18 steps and 210 steps, only points in the indicated ranges are picked for verification of agreement with demanded position.

The ACTION statements which permit limited variations from the basic requirements are accompanied by additional restrictions which ensure that the original design criteria are met. Misalignment of a rod requires measurement of peaking factors and a restriction in THERMAL POWER. These restrictions provide assurance of fuel rod integrity during continued operation. In addition, those safety analyses affected by a misaligned rod are reevaluated to confirm that the results remain valid during future operation.

For Specification 3.1.3.1 ACTIONS b and c it is incumbent upon the plant to verify the trippability of the inoperable control rod(s). This may be by verification of a control system failure, usually electrical in nature, or that the failure is associated with the control rod stepping mechanism. In the event the plant is unable to verify the rod(s) trippability, it must be assumed to be untrippable and thus fall under the requirements of ACTION a. Assuming a controlled shutdown from 100% RATED THERMAL POWER, this allows approximately four hours for this verification.

The maximum rod drop time restriction is consistent with the assumed rod drop time used in the safety analyses. Measurement with  $T_{avg}$  greater than or equal to 551°F and with all reactor coolant pumps operating ensures that the measured drop times will be representative of insertion times experienced during a Reactor trip at operating conditions.

Control rod positions and OPERABILITY of the rod position indicators are required to be verified on a nominal basis of once per 12 hours with more frequent verifications required if an automatic monitoring channel is inoperable. These verification frequencies are adequate for assuring that the applicable LCOs are satisfied.

MONTHLY OPERATING REPORTS (Continued)

shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT

6.9.1.6a Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle for the following:

- 1). Moderator temperature coefficient BOL and EOL limits and 300 ppm surveillance limit for Specification 3/4.1.1.3,
- 2). Shutdown Rod Insertion Limit for Specification 3/4.1.3.5, :
- 3). Control Rod Insertion Limits for Specification 3/4.1.3.6,
- 4). AXIAL FLUX DIFFERENCE Limits and target band for Specification 3/4.2.1.,
- 5). Heat Flux Hot Channel Factor,  $K(Z)$ ,  $W(Z)$ ,  $F_Q^{RTP}$ , and the  $F_Q^C(Z)$  allowances for Specification 3/4.2.2,
- 6). Nuclear Enthalpy Rise Hot Channel Factor Limit and the Power Factor Multiplier for Specification 3/4.2.3.
- 7). Shutdown Margin for Specifications 3/4.1.1.1, 3/4.1.1.2, 3/4.1.2.2, 3/4.1.2.4, and 3/4.1.2.6.

6.9.1.6b The following analytical methods used to determine the core operating limits are for Units 1 and 2, unless otherwise stated, and shall be those previously approved by the NRC in:

- 1). WCAP-9272-P-A, "WESTINGHOUSE RELOAD SAFETY EVALUATION METHODOLOGY," July 1985 (W Proprietary). (Methodology for Specifications 3.1.1.3 - Moderator Temperature Coefficient, 3.1.3.5 - Shutdown Bank Insertion Limit, 3.1.3.6 - Control Bank Insertion Limits, 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor, 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor, 3/4.1.1.1, 3/4.1.1.2, 3/4.1.2.2, 3/4.1.2.4, and 3/4.1.2.6 - Shutdown Margin.)
- 2). WCAP-8385, "POWER DISTRIBUTION CONTROL AND LOAD FOLLOWING PROCEDURES - TOPICAL REPORT," September 1974 (W Proprietary). (Methodology for Specification 3.2.1 - Axial Flux Difference [Constant Axial Offset Control].)
- 3). T. M. Anderson to K. Kniel (Chief of Core Performance Branch, NRC) January 31, 1980--Attachment: Operation and Safety Analysis Aspects of an Improved Load Follow Package. (Methodology for Specification 3.2.1 - Axial Flux Difference [Constant Axial Offset Control].)
- 4). NUREG-0800, Standard Review Plan, U.S. Nuclear Regulatory Commission, Section 4.3, Nuclear Design, July 1981. Branch Technical Position CPB 4.3-1, Westinghouse Constant Axial Offset Control (CAOC), Rev. 2, July 1981. (Methodology for Specification 3.2.1 - Axial Flux Difference [Constant Axial Offset Control].)

## ADMINISTRATIVE CONTROLS

### ANNUAL REPORTS (Continued)

- b. The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.7. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ( $\mu\text{Ci/gm}$ ) and one other radioiodine isotope concentration ( $\mu\text{Ci/gm}$ ) as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

### ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT\*

6.9.1.3 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM, and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR 50.

### ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT\*\*

6.9.1.4 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR 50.

### MONTHLY OPERATING REPORTS

6.9.1.5 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves,

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\*A single submittal may be made for a multiple unit station.

\*\*A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

CORE OPERATING LIMITS REPORT (Continued)

- 5). WCAP-10216-P-A, Revision 1A, "RELAXATION OF CONSTANT AXIAL OFFSET CONTROL  $F_Q$  SURVEILLANCE TECHNICAL SPECIFICATION," February 1994 (W Proprietary). (Methodology for Specification 3.2.2 - Heat Flux Hot Channel Factor ( $W(z)$ ) surveillance requirements for  $F_Q$  Methodology.)
- 6). WCAP-10079-P-A, "NOTRUMP, A NODAL TRANSIENT SMALL BREAK AND GENERAL NETWORK CODE," August 1985, (W Proprietary).
- 7). WCAP-10054-P-A, "WESTINGHOUSE SMALL BREAK ECCS EVALUATION MODEL USING THE NOTRUMP CODE", August 1985, (W Proprietary).
- 8). WCAP-11145-P-A, "WESTINGHOUSE SMALL BREAK LOCA ECCS EVALUATION MODEL GENERIC STUDY WITH THE NOTRUMP CODE", October 1986, (W Proprietary).
- 9). RXE-90-006-P, "Power Distribution Control Analysis and Overtemperature N-16 and Overpower N-16 Trip Setpoint Methodology," February 1991. (Methodology for Specification 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor.)
- 10). RXE-88-102-P, "TUE-1 Departure from Nucleate Boiling Correlation", January 1989.
- 11). RXE-88-102-P, Sup. 1, "TUE-1 DNB Correlation - Supplement 1", December 1990.
- 12). RXE-89-002, "VIPRE-01 Core Thermal-Hydraulic Analysis Methods for Comanche Peak Steam Electric Station Licensing Applications", June 1989.
- 13). RXE-91-001, "Transient Analysis Methods for Comanche Peak Steam Electric Station Licensing Applications", February 1991.
- 14). RXE-91-002, "Reactivity Anomaly Events Methodology", May 1991. (Methodology for Specification 3.1.1.3 - Moderator Temperature Coefficient, 3.1.3.5 - Shutdown Bank Insertion Limit, 3.1.3.6 - Control Bank Insertion Limits, 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor, 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor.)
- 15). RXE-90-007, "Large Break Loss of Coolant Accident Analysis Methodology", December 1990.
- 16). TXX-88306, "Steam Generator Tube Rupture Analysis", March 15, 1988.
- 17). RXE-91-005, "Methodology for Reactor Core Response to Steamline Break Events," May, 1991. (Methodology for Specifications 3/4.1.1.1, 3/4.1.1.2, 3/4.1.2.2, 3/4.1.2.4, and 3/4.1.2.6 - Shutdown Margin.)

CORE OPERATING LIMITS REPORT (Continued)

Reference 18) is for Unit 2 only:

- 18). WCAP-9220-P-A, Rev. 1, "WESTINGHOUSE ECCS EVALUATION MODEL- 1981 Version", February 1982 (W Proprietary).
- 19). RXE-94-001-A, "Safety Analysis of Postulated Inadvertent Boron Dilution Event in Modes 3, 4, and 5," February 1994. (Methodology for Specifications 3/4.1.1.1, 3/4.1.1.2, 3/4.1.2.2, 3/4.1.2.4, and 3/4.1.2.6 - Shutdown Margin.)

6.9.1.6c The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as SHUTDOWN MARGIN, and transient and accident analysis limits) of the safety analysis are met.

6.9.1.6d The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 44 AND 30 TO

FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89

TEXAS UTILITIES ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated August 15, 1995 (TXX-95215), Texas Utilities Electric Company (TU Electric/the licensee) requested changes to the Technical Specifications (TSs) (Appendix A to Facility Operating License Nos. NPF-87 and NPF-89) for the Comanche Peak Steam Electric Station, Units 1 and 2. The proposed changes would move the Shutdown Margin limits from the TSs to the Core Operating Limits Report (COLR). The proposed changes are consistent with the intent of Generic Letter (GL) 88-16 which provides guidelines for the removal of cycle-specific parameter limits from the TSs.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TSs to be included as part of the license. The Commission's regulatory requirements related to the content of TSs are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

The Commission has provided guidance for the contents of TSs in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TSs to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether a particular matter is required to be included in the TSs, as follows: (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.<sup>1</sup> As a result, existing TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TSs, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents. The Commission recently adopted amendments to 10 CFR 50.36, pursuant to which the rule was revised to codify and incorporate these criteria.

### 3.0 EVALUATION

The licensee requested the following TS changes:

- 1) 3/4.1.1, "Boration Control" and 3/4.1.2, "Boration Systems"

The proposed changes remove the values for shutdown margin shown in Specifications 3.1.1.1, 4.1.1.1.1, 3.1.1.2, 4.1.1.2, 3.1.2.2, 3.1.2.4 and 3.1.2.6, add appropriate references to the COLR, and revise the related BASES (3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN and 3/4.1.2 BORATION SYSTEMS).

- 2) 6.9.1.6, "Core Operating Limits Report"

The proposed changes modify TS 6.9.1.6a by adding the removed parameter limits to the list of items contained in the COLR, including a reference to the implementing TSs. TS 6.9.1.6b is revised to add item 19), TU Electric Report, RXE-94-001-A, "Safety Analysis of the Postulated

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<sup>1</sup> See Final Rule, "Technical Specifications," 60 FR 36953 (July 19, 1995). The Commission indicated that reactor core isolation cooling, isolation condenser, residual heat removal, standby liquid control, and recirculation pump trip systems are included in the TS under Criterion 4, although it recognized that other structures, systems, and components could also meet this criterion (60 FR at 36956).

Inadvertent Boron Dilution Event in Modes 3, 4, and 5." In addition, TS 6.9.1.6b Items 1) and 17) are revised to specify the removed parameter limits and their implementing specifications.

The shutdown margin is based on the accident analyses performed for a specific cycle. The accident analyses performed to justify the required shutdown margin must be performed in accordance with approved methodologies and must satisfy NRC-approved event acceptance criteria. The removal of parameter limits from the TSs and their addition to the COLR does not obviate the requirement to operate within those limits.

In order to remove cycle-specific limits, GL 88-16, "Guidance for Technical Specification Changes for Cycle-Specific Parameter Limits" requires: (1) the addition of the definition of a named formal report that includes the cycle-specific parameter limits that have been established using NRC-approved methodology and consistent with all applicable limits of the safety analysis, (2) the addition of an administrative reporting requirement to submit the formal report on cycle-specific parameter limits to the Commission for information, and (3) the modification of individual TSs to note that the cycle-specific parameters shall be maintained within the limits provided in the defined formal report.

The NRC determined that the licensee has previously defined the COLR, in Specification 1.10, as the appropriate formal report for cycle-specific parameter limits. Appropriate administrative controls requiring the use of NRC-approved methodology and providing the reporting requirements for the COLR have also been previously defined in Specification 6.9.1.6. Specifically, TU Electric Report, RXE-94-001-A, provides the NRC-approved methodology used in the analysis of required shutdown margin. This report was approved by NRC letter from Thomas A. Bergman to Mr. William J. Cahill, Jr., dated November 3, 1993. Finally, the proposed TSs replace the actual shutdown margin values with the statement "the value specified in the COLR."

The NRC staff concludes that the removal of these values from the TSs is consistent with the guidance provided in GL 88-16, "Guidance for Technical Specification Changes for Cycle-Specific Parameter Limits." The limits presented in the COLR may be modified, provided the requirements of Specification 6.9.1.6 are met (i.e., the modifications are determined using NRC-approved methodologies and meet all applicable limits of the plant safety analysis). The proposed changes will also eliminate the need for periodic license amendment requests that would be required for inconsequential changes to the values of these cycle specific parameters. Additionally, the relocation of the values for shutdown margin from the TSs to the COLR does not eliminate the requirements for the licensee to ensure that the reactivity control systems are performing their safety functions and that adequate shutdown margin is available to satisfy General Design Criterion 26.

Finally, the staff has concluded that the shutdown margin values are not required to be in the TSs under 10 CFR 50.36 or Section 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal

situation or event giving rise to an immediate threat to the public health and safety. Further, they do not fall within any of the four criteria set forth in the Commission's Final Policy Statement, discussed above. In addition, the NRC staff finds that sufficient regulatory controls exist under 10 CFR 50.59 to ensure that future changes to these requirements are acceptable. Accordingly, the staff has concluded that these requirements may be relocated from the TSs to the COLR.

#### 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 and change surveillance requirements. 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 (60 FR 52935). 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.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: T. Polich

Date: December 15, 1995