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

June 12, 1996

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT NOS. 50 AND 36 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89 (TAC NOS. M89423, M89424, M90205, AND M90206)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 50 and 36 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 applications dated April 25 (TXX-94119) and August 12, 1994 (TXX-94216), as supplemented by letters dated February 15 (TXX-96055), March 7 (TXX-96078), and April 11, 1996 (TXX-96111).

These amendments modify the Administrative Controls specifications, and relocate/remove requirements that are adequately controlled by existing regulations. Guidance on the proposed changes was developed by NRC and provided in the Standard Technical Specifications for Westinghouse Plants, NUREG-1431. The changes also update unit staff qualification requirements to Regulatory Guide 1.8, Revision 2.

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: P. Ray for
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. 50 to NPF-87
2. Amendment No. 36 to NPF-89
3. Safety Evaluation

cc w/encls: See next page

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Document Name: CP89423R.AMD SEE PREVIOUS CONCURRENCE*

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COPY	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO

P.A. Ray signed 6/12/96

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

June 12, 1996

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

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cc w/encls: See next page

Mr. C. Lance Terry
TU Electric Company

Comanche Peak, Units 1 and 2

cc:
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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. 50
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The applications for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated April 25 (TXX-94119) and August 12, 1994 (TXX-94216), as supplemented by letters dated February 15 (TXX-96055), March 7 (TXX-96078), and April 11, 1996 (TXX-96111), 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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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 with 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

for 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: June 12, 1996

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. 36
License No. NPF-89

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The applications for amendment by Texas Utilities Electric Company (TU Electric, the licensee) dated April 25 (TXX-94119) and August 12, 1994 (TXX-94216), as supplemented by letters dated February 15 (TXX-96055), March 7 (TXX-96078), and April 11, 1996 (TXX-96111), 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. 50, and the Environmental Protection Plan

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 36, 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 with 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

for 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: June 12, 1996

ATTACHMENT TO LICENSE AMENDMENT NOS. 50 AND 36

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	INSERT
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xvi	xvi
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6-2	6-2
6-3	6-3
6-4	6-4
6-5	6-5
6-6	6-6
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6.1 RESPONSIBILITY

6.1.1 The Vice President of Nuclear Operations* shall be responsible for overall operation of the units and shall delegate in writing the succession to this responsibility during his absence.

The Vice President of Nuclear Operations*, or his designee, in accordance with approved administrative procedures, shall approve prior to implementation, each proposed test or experiment and proposed changes and modifications to unit systems or equipment that affect nuclear safety.

6.1.2 The Shift Manager shall be responsible for the control room command function. A management directive to this effect, signed by the Group Vice President, Nuclear Production shall be issued annually to all station personnel. During any absence of the Shift Manager from the control room command function. During any absence of the Shift Manager from the control room while the unit is in MODE 1, 2, 3 or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATION

An onsite and an offsite organization shall be established for unit operation and corporate management, respectively. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. These requirements shall be documented in the FSAR.

b. The Vice President of Nuclear Operations* shall be responsible for overall site safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Group Vice President, Nuclear Production shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

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*Duties may be performed by the Plant Manager if that organizational position is assigned.

ONSITE AND OFFSITE ORGANIZATION (Continued)

d. The individuals who train the operating staff and those who carry out the radiation protection and quality assurance functions may report to the appropriate manager onsite; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

The unit organization shall include the following:

a. An Auxiliary Operator shall be assigned to each reactor containing fuel and an additional Auxiliary Operator shall be assigned if either unit is operating;

b. At least one licensed Operator for each unit shall be in the control room when fuel is in either reactor. In addition, while either unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;

c. A Radiation Protection Technician* and a Chemistry Technician* shall be on site when fuel is in the reactor;

d. A site Fire Brigade of at least five members* shall be maintained on site at all times. The Fire Brigade shall not include the Shift Manager and the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency;

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, Radiation Protection Technicians, auxiliary operators, and key maintenance personnel).

   The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12);

f. The Shift Operations Manager shall hold a Senior Reactor Operator license; and

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*The Radiation Protection and the Chemistry Technicians and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

UNIT STAFF (Continued)

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 2, 1987.

6.4 NOT USED

6.5 NOT USED

6.6 NOT USED

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. In accordance with 10 CFR 50.72, the NRC Operations Center, shall be notified by telephone as soon as practical and in all cases within one hour after the violation has been determined. The Plant Manager*, the Vice President of Nuclear Operations* and the Operations Review Committee (ORC) shall be notified within 24 hours.

b. A Licensee Event Report shall be prepared in accordance with 10 CFR 50.73.

c. The Licensee Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to the Plant Manager*, the Vice President of Nuclear Operations*, Station Operations Review Committee (SORC), and Operations Review Committee (ORC) within 30 days after discovery of the event.

d. Critical operation of the unit shall not be resumed until authorized by the Nuclear Regulatory Commission.

*If that organizational position is assigned.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;

c. Not used;

d. Not used;

e. Not used;

f. OFFSITE DOSE CALCULATION MANUAL implementation;

g. Quality Assurance for effluent and environmental monitoring;

h. Fire protection program implementation; and

i. Technical Requirements Manual implementation.

6.8.2 Not used.

6.8.3 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the post accident recirculation portions of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, RHR System, and RCS Sampling System (Post Accident Sampling System portion only). The program shall include the following:

1) Preventive maintenance and periodic visual inspection requirements, and

2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. Not used.

PROCEDURES AND PROGRAMS (Continued)

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation and low pressure turbine disc stress corrosion cracking. This program shall include:

1) Identification of a sampling schedule for the critical variables and control points for these variables,

2) Identification of the procedures used to measure the values of the critical variables,

3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,

4) Procedures for the recording and management of data,

5) Procedures defining corrective actions for all off-control point chemistry conditions, and

6) A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1) Training of personnel,

2) Procedures for sampling and analysis, and

3) Provisions for maintenance of sampling and analysis equipment.

e. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

PROCEDURES AND PROGRAMS (Continued)

e. Radioactive Effluent Controls Program (Continued)

1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001-20.2402,

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR 50,

5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,

6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR 50,

7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the SITE BOUNDARY conforming to the following:

   a. For noble gases: Less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and

   b. For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/yr to any organ,

8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50,

PROCEDURES AND PROGRAMS (Continued)

9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR 50, and

10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR 190.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted.

6.9.1.1 Not used.

ANNUAL REPORTS*

6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

a. A tabulation on an annual basis of the number of station, utility, and other individuals (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent greater than 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions** e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions;

*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

**This tabulation supplements the requirements of 10 CFR 20.2206.

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 (μCi/gm) and one other radioidine isotope concentration (μCi/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.

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 20th 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].)

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.

SPECIAL REPORTS

6.9.2 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

6.10 NOT USED

6.11 NOT USED

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 10 CFR 20.1601(c), in lieu of the "control device" or "alarm signal" required by paragraph 10 CFR 20.1601(a), each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is equal to or less than 1000 mrem/h at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Radiation Protection Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with dose rates equal to or less than 1000 mrem/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

HIGH RADIATION AREA (Continued)

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and individuals have been made knowledgeable of them; or

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with radiation levels greater than 1000 mrem/h at 30 cm (12 in.) but less than 500 rads in one hour at one meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or radiation protection supervision. Doors shall remain locked except during periods of access by individuals under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by individuals qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For isolated high radiation areas accessible to individuals with radiation levels of greater than 1000 mrem/h at 30 cm but less than 500 rads in one hour at one meter that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the isolated area, that isolated area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 NOT USED

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained for the duration of the unit Operating License. This documentation shall contain:

1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

OFFSITE DOSE CALCULATION MANUAL (ODCM) (Continued)

2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by the SORC and the approval of the Vice President of Nuclear Operations.*

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

*Duties may be performed by the Plant Manager if that organizational position is assigned.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 50 AND 36 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 applications dated April 25 (TXX-94119) and August 12, 1994 (TXX-94216) as supplemented by letters dated February 15 (TXX-96055), March 7 (TXX-96078), and April 11, 1996 (TXX-96111), 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 (CPSES), Units 1 and 2. These proposed changes modify the Administrative Controls specifications, and relocate/remove requirements that are adequately controlled by existing regulations. Guidance on the proposed changes was developed by NRC and provided in the Standard Technical Specifications for Westinghouse Plants, NUREG-1431. The changes also update unit staff qualification requirements to Regulatory Guide (RG) 1.8, Revision 2. The supplemental letters dated February 15, March 7, and April 11, 1996, provided clarification only and did not change the initial proposed no significant hazards determina-tion.

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 TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls.

Additionally, 10 CFR 50.36(c)(5) states that, "Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TSs is therefore, that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has

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determined that requirements that are not specifically required under 10 CFR 50.36(c)(5) and which are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from administrative controls.

Other requirements may be relocated to more appropriate documents (e.g., Security Plan, Quality Assurance (QA) Plan, and Emergency Plan) and controlled by the applicable regulatory requirement.

3.0 EVALUATION

3.1 Title Updates and Reassigned Functions

In accordance with 10 CFR 50.90, the following changes to the Administrative Controls (throughout Section 6.0) of the CPSES, Units 1 and 2 TSs are proposed to reflect position title updates and reassigned functions as a result of TU Electric organizational changes:

1. The organizational position title and functions of the "Group Vice President, Nuclear Engineering and Operations" (6.2.1c.) are reassigned to the "Group Vice President, Nuclear Production".

2. The organizational position of the "Vice President, Nuclear Operations" (6.1.1, 6.2.1b., 6.7.1a., 6.7.1c. and 6.14b.) is retitled to "Vice President of Nuclear Operations". The functions of the "Vice President, Nuclear Operations" (6.1.1, 6.2.1b. and 6.14b.) and "Plant Manager" (6.1.1) are reassigned to the "Vice President of Nuclear Operations*". A footnote is added (indicated by *) to these specific functions which states that these duties may be performed by the Plant Manager if that organizational position is assigned.

3. The responsibility for approval of each proposed test or experiment and proposed changes and modifications to unit systems or equipment that affect nuclear safety is relocated within the TSs from Sections 6.5.3.1b. and 6.5.3.1c. to Section 6.1.1 and reassigned to the "Vice President of Nuclear Operations*, or his designee, in accordance with approved administrative procedures".

4. The requirement for designation of the command function during any absence of the Shift Supervisor from the Control Room is relocated within the TSs from Table 6.2-1 to Section 6.1.2.

5. The function of the "Vice President, Nuclear Operations" for signing the annual management directive concerning the Shift Supervisor's Control Room command function (6.1.2) is reassigned to the "Group Vice President, Nuclear Production".

6. The notifications and submittals of Section 6.7.1 (Safety Limit Violations) are revised to add the "Plant Manager" position. Also, a footnote is added (indicated by *) to the positions of

Vice President of Nuclear Operations and Plant Manager as discussed in Sections 6.7.1a. and 6.7.1c. The footnote explains that the subject notifications/submittals shall be made to the manager if that organizational position is assigned.

7. The organizational position of "Shift Supervisor" (6.1.2, 6.2.2e. renumbered as 6.2.2d., 6.2.4.1 renumbered as 6.2.2g., and 6.12.2) is retitled to "Shift Manager".

8. TS 6.2.4.1 which provides requirements for the Shift Technical Advisor (STA) is renumbered as TS 6.2.2g..

In summary, these changes revise the Administrative Controls in the CPSES TSs to reflect TU Electric organizational changes and change the number of several specifications. The changes are merely administrative and have no impact on actual unit staff qualifications or plant operation. Therefore, the proposed changes are acceptable.

3.2 Submittal Due Date

The licensee proposed a change in the submittal due date of the Monthly Operating Report (6.9.1.5) from "no later than the 15th of each month" to "no later than the 20th of each month".

The proposed change in the submittal due date of the Monthly Operating Report (from the 15th to the 20th of each month (6.9.1.5)) is to provide the licensee additional time to facilitate data compilation and report preparation, review and approval for two operating units. This change is strictly administrative and does not alter any data or information already reported. Therefore, the proposed change is acceptable.

3.3 Removal and Relocation

The following discussions detail the staff's conclusions regarding the removal or relocation of selected Administrative Controls from the CPSES, Units 1 and 2 TSs. The changes were reviewed in accordance with the guidance provided in, or planned for, the applicable Standard Technical Specifications, NUREG-1431. In addition, these changes were reviewed in accordance with the guidance provided in Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance" issued on December 12, 1995.

a. Detailed Composition and Responsibilities of the Minimum Shift Crew

TU Electric proposes to relocate the administrative controls related to minimum shift crew composition and responsibilities (in TS Section 6.2.2d and Table 6.2-1) to the FSAR.

The requirements on Minimum Shift Crew Composition and the associated Table are provided in 10 CFR 50.54(k), (l), and (m) for shift complement

regarding licensed operators. Section 50.54 describes the minimum shift crew composition and delineates which positions require a reactor operator (RO) or a senior reactor operator (SRO) license.

The staff concludes that the regulatory requirements in 10 CFR 50.54 provide sufficient control of these provisions and removing them from the TSs is acceptable.

b. Independent Safety Engineering Group (ISEG)

The TSs related to ISEG (TS Section 6.2.3) resulted from the NUREG-0737, "Clarification of TMI Action Plan Requirements," requirements to establish an on-site independent safety engineering group to perform independent reviews of plant operations. The current TS requirements reflect the NUREG-0737 requirements defining the function, composition, responsibilities and records associated with the ISEG organization. The ISEG's function is to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The licensee has proposed to relocate these TS requirements to the Quality Assurance Program (QAP) and control any subsequent changes in accordance with 10 CFR 50.54(a). The licensee provided proposed FSAR changes to Chapter 17.2 (QAP) as part of the supplemental information to this request and the staff has verified that the commitments to be incorporated into the QAP adequately address the relocated TS requirements.

The staff has concluded that the relocation of ISEG requirements is acceptable because (1) their inclusion in TSs is not specifically required by 10 CFR 50.36 or other regulations, (2) the ISEG requirements are not necessary for operation of the facility in a safe manor, but for increasing unit safety and (3) changes to the ISEG provisions, as incorporated into the QAP, are adequately controlled in accordance with 10 CFR 50.54(a). On this basis, the staff finds the proposed relocation of ISEG requirements to the QAP to be acceptable.

c. Review and Audit

The licensee proposed that the existing requirements in TS 6.5 related to review and audit functions be relocated to the QAP implementing 10 CFR Part 50, Appendix B, except with respect to those associated with the security and emergency plans which, as described in 3.d below are being relocated to their respective plans.

Given that the requirements in the QAP implement the Commission's regulations pertaining to the review and audit functions, inclusion of these particular provisions in TSs is not necessary to assure safe operation of the facility. The review and audit functions define an administrative framework to confirm that plant activities have been properly conducted in a safe manner. The reviews and audits serve also

to provide a cohesive program that provides senior level utility management with assessments of facility operation and recommends actions to improve nuclear safety and reliability. However, the staff has determined that the review and audit functions are adequately addressed by existing regulations and the proposed FSAR changes related to QAP commitments. It is not necessary to include redundant or additional requirements in the TS administrative controls due to the presence of review and audit provisions specified in Criterion XVIII of Appendix B, as implemented by the QAP.

Audit requirements are specified in the QAP to satisfy 10 CFR Part 50, Appendix B, Criterion XVIII. Audits are also covered by ANSI N18.7, ANSI N45.2, 10 CFR 50.54(t), 10 CFR 50.54(p), and 10 CFR Part 73.

The licensee has proposed to relocate, with exception of the security and emergency plans, the provisions in the existing TSs to the QAP. Changes to the QAP are controlled in accordance with 10 CFR 50.54(a). The staff concludes that this regulatory requirement provides sufficient control for the audit functions and frequencies, so that removing these requirements from the TSs is acceptable.

Additionally, the licensee proposed removal of the Citizens Association for Sound Energy (CASE) representative from the Operations Review Committee (ORC) in TS 6.5.2. The Joint Stipulation Agreement signed on June 30, 1988, provided for a CASE representative to be on the ORC for a period of 5 years after the agreement was signed. The 5-year period expired on June 30, 1993, therefore, the proposed removal is acceptable.

d. Security Plan Implementation and Emergency Plan Implementation

The licensee proposed to remove the requirements, in existing TSs 6.5.3.1f, 6.8.1c and 6.8.1d, related to the implementation and audits of the Security Plan and Emergency Plan.

The removal of the administrative control TSs for the implementation and audit of the Security Plan and the Emergency Plan is addressed in GL 93-07. Since the Security Plan requirements are specified in 10 CFR 50.54, 73.40, 73.55 and 73.56, and the Emergency Plan requirements are specified in 10 CFR 50.54 and 10 CFR Part 50, Appendix E, Section V, the staff recommended removal of these requirements from the STS and relocation to the respective plans.

Future changes in the audit review requirements must be made in accordance with 10 CFR 50.54(p) for the Security Plan and 10 CFR 50.54(q) for the Emergency Plan. The staff concludes that the requirements for emergency planning in 10 CFR 50.47, and 50.54, and for security in 10 CFR 50.54 and 73.55 for drills, exercises, testing, and maintenance of the program are sufficient and, therefore, removing these duplicate provisions from the TSs is acceptable.

e. Reportable Event Action

The licensee proposed to remove the existing requirement in TS 6.6.1(a) and to relocate the existing requirement from TS 6.6.1(b) to the FSAR Chapter 17.2.

The requirement in TS 6.6.1(a) administrative control section that the Commission be notified of all reportable events is also contained in 10 CFR 50.73(a)(2) which requires the licensee to submit a Licensee Event Report (LER) for all reportable events specified in 10 CFR 50.73. The reports must be submitted within 30 days. The licensee's existing procedures include the implementation of the requirements of 10 CFR 50.72 and 10 CFR 50.73.

The requirement in TS 6.6.1(b) administrative control section that each reportable event be reviewed by SORC is not covered by any other regulation and may be moved to the FSAR Chapter 17.2, the Quality Assurance Program, as described in NRC Administrative Letter 95-06, Relocation of Technical Specification Administrative Controls Related to Quality Assurance. NRC Administrative Letter 95-06 states, "[review and audit] Commitments may be incorporated into the quality assurance plan by relocating the existing technical specifications intact...". Subsequent changes to the relocated requirements would be controlled in accordance with 10 CFR 50.54(a).

The staff concludes that the reporting requirements in 10 CFR 50.72 and 10 CFR 50.73 are sufficient, and the duplicate reporting requirement removal from the TS is acceptable. Also, the relocation of the review requirements of reportable events to the QAP is acceptable as specified in NRC Administrative letter 95-06.

f. Review and Approval Process

The licensee proposed to relocate the requirements for the review and approval process in TS 6.8.2 to the QAP.

The revised TSs will include a specific requirement that written procedures be established, implemented and maintained. A requirement for procedure control is mandated by 10 CFR Part 50, Appendix B, Criterion II and Criterion V. ANSI N18.7-1976, which is an NRC staff-endorsed document used in the development of many licensee QA plans, also contains specific guidance related to procedures. The licensee has committed to follow ANSI N18.7-1976 as a means to comply with 10 CFR Part 50, Appendix B. ANSI N18.7-1976, Section 5.2.2 discusses procedure adherence. This section clearly states that procedures shall be followed, and the requirements for use of procedures shall be prescribed in writing. ANSI N18.7-1976 also discusses temporary changes to procedures, and requires review and approval of procedures to be defined. ANSI N18.7-1976, Section 5.2.15, describes the review, approval, and control of procedures. This section describes the requirements for the licensee's QAP to provide measures to control and

coordinate the approval and issuance of documents, including changes thereto, which prescribe all activities affecting quality. The section further states that each procedure shall be reviewed and approved prior to initial use. The required reviews are also described. ANSI N45.2-1971, Section 6, also specifies that the QAP describe procedure requirements.

The provisions in the proposed (QAP), will implement the Commission's regulations pertaining to the control of documents such as instructions, procedures, and drawings, including changes thereto. The procedure review and approval functions currently in TSs define an administrative framework to ensure that documents are reviewed for adequacy and approved for release by authorized personnel. The required control of these processes in the regulations and revised QAP is considered to be redundant and functionally equivalent to the provisions currently in TSs. The staff has determined that the procedure review and approval functions are adequately addressed by existing regulations and the related QAP commitments. Based upon the relocation of the procedure review provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The licensee will continue to implement a QAP in accordance with the requirements of 10 CFR Part 50, Appendix B, which provides appropriate controls for the review and approval of procedure changes. The staff concludes that these regulatory requirements provide sufficient control of these provisions and removing them from the TSs is acceptable. Future changes to the review and approval process for procedure changes can be adequately controlled under 10 CFR 50.54(a).

g. <u>In-Plant Radiation Monitoring Program</u>

The licensee proposed to relocate the requirements in existing TS 6.8.3b related to the In-Plant Radiation Monitoring Program to the FSAR.

The In-Plant Radiation Monitoring Program provides controls to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program was developed to minimize radiation exposure to plant personnel (post-accident). The staff concludes that these provisions are not required to be in the TSs under 10 CFR 50.36(c)(5). The In-Plant Radiation Monitoring Program does not involve monitoring process variables that are initial conditions for a design-basis transient or a design-basis accident (DBA), nor does it involve a primary success path to mitigate a DBA. Thus, the In-Plant Radiation Program is not necessary for operation of the facility in a safe manor. Therefore, the staff concludes that these provisions may be relocated to the FSAR and 10 CFR 50.59 provides adequate control for future changes to the In-Plant Radiation Monitoring Program.

h. Radiological Environmental Monitoring Program

The licensee proposed to remove the requirements in existing TS 6.8.3f related to the Radiological Environmental Monitoring Program.

The existing Radiological Environmental Monitoring Program require that procedures be prepared for monitoring the radiation and radionuclides in the environs of plants, consistent with the guidance specified in 10 CFR Part 50, Appendix I. These procedures were developed to ensure that radioactive effluents are restricted to levels as low as reasonably achievable and have no impact on plant nuclear safety. The licensee has proposed to relocate the details and description of the program to the ODCM, as was described in GL 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of Technical Specifications and Relocation of Procedural Details of RETS to the Offsite Dose Calculational Manual or the Process Control Program." The staff concludes that the requirements in 10 CFR 20.1302, 40 CFR Part 190, and 10 CFR Part 50, Appendix I provide sufficient control of these provisions and removing them from the TS is acceptable.

i. Startup Report

TU Electric proposed to relocate the startup report requirement (TS Section 6.9.1.1) to the FSAR. The report is a summary of plant startup and power escalation testing after the following: receipt of the operating license, an increase in licensed power level, the installation of nuclear fuel with a different design or manufacturer than that for the current fuel, and modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the core. The report provides a mechanism by which the staff could review the appropriateness of licensee activities after the fact but contained no requirement for staff approval. The approved 10 CFR Part 50, Appendix B, QA Plan, and Startup Test Program (in the FSAR) provide assurance that the listed activities are adequately performed and that appropriate corrective actions, if required, are taken.

Inasmuch as this report had to be provided to the staff within 90 days after completion of the respective milestone, it was clearly not necessary to assure safe operation of the facility for the interval between completion of the startup testing and submittal of the report.

Additionally, because the staff was not required to approve the report, the startup report is not necessary to assure safe operation. Therefore, the removal of this requirement is acceptable.

j. Record Retention

The licensee proposed that the requirements for record retention in TS 6.10 be relocated because they are adequately addressed by the QA Program (10 CFR Part 50, Appendix B, Criteria XVII).

The provisions in the QAP implement the Commission's regulations pertaining to the maintenance of records related to activities affecting quality. The required controls related to record retention specified in various regulations and the provision incorporated into the QAP are considered to be redundant to the requirements currently in TSs. The staff has determined that record retention requirements are adequately addressed by existing regulations and the related QAP commitments. Based upon the relocation of the record retention provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The staff concludes that the regulatory requirements under 10 CFR Part 50, Appendix B provide sufficient control of the plant records, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a). In addition, numerous other regulations such as 10 CFR Part 20, Subpart L, and 10 CFR 50.71 require the retention of certain records related to operation of the nuclear plant. The staff concludes that these regulatory requirements provide sufficient control of these recordkeeping provisions and removing them from the TSs is acceptable.

k. Radiation Protection Program

The licensee proposed to relocate to the FSAR the requirements in existing TS 6.11 related to the Radiation Protection Program.

The existing TSs for the Radiation Protection Program require procedures to be prepared for personnel radiation protection consistent with the requirements of 10 CFR Part 20. The requirement for procedures to implement Part 20 is also contained in 10 CFR 20.1101(b). Periodic review of these procedures is addressed under 10 CFR 20.1101(c).

The staff concludes that the requirements of the regulations provide sufficient requirements for the Radiation Protection Program, such that administrative controls in the TSs are unnecessary. On this basis, the staff concludes that the requirements for the Radiation Protection Program do not have to be controlled by TSs, and changes to the Radiation Protection Program are adequately controlled by 10 CFR Part 20 and 10 CFR 50.59.

l. Process Control Program

The licensee proposes to relocate requirements for the Process Control Program (PCP) TS 6.8.1(e) and the PCP change process TS 6.13 to the FSAR Chapter 11.

The PCP contains the current formulas, sampling, analyses, tests, and determinations, to ensure that processing and packaging of solid radioactive wastes will be accomplished in compliance with 10 CFR Parts 20, 61, 71 that govern the disposal of solid radioactive waste. The PCP does not involve plant systems or components that initiate

conditions for a design-basis transient or a design-basis accident, nor does it involve a primary success path to mitigate a design-basis accident. Thus, the PCP is not necessary for operation of the facility in a safe manor.

Therefore, the staff concludes that the requirements for a PCP are contained in 10 CFR Parts 20, 61, and 71 and duplicate requirements may be relocated to the FSAR. In addition, these administrative controls are not, for the reasons discussed above, required to be in TS by 10 CFR 50.36(c)(5). Finally, the Staff concludes that 10 CFR 50.59 provides adequate regulatory control for future changes to the PCP.

m. Training and Unit Staff Qualifications

The licensee proposed to remove the one time exception to allow the individual filling the Radiation Protection Manager (RPM) position to NOT meet the full qualification requirements of RG 1.8 because it is no longer necessary. The individual filling the position meets the full requirements for the position. The staff finds the removal of the exception acceptable.

The licensee proposed to remove the training requirements in existing TS 6.4, and revise the unit staff qualification TS Section 6.3. The requirements for training are adequately addressed by other administrative controls and the regulations. Section 50.54 describes the minimum shift crew composition and delineates which positions require a RO or an SRO license. Training and requalification of those positions are as specified in 10 CFR Part 55. The retained administrative controls TSs on "Unit Staff Qualifications" provides adequate requirements to assure a competent operating staff. The administrative controls TSs on "Organization" describes the details of the required qualifications. The FSAR describes the details of the training program.

The staff concludes that the regulatory requirements in 10 CFR 50.54 and Part 55 provide sufficient controls for the training provisions and removing them from the TSs is acceptable.

In conclusion, the above relocated requirements relating to administrative controls are not required to be in the TS under 10 CFR 50.36 (c) (5) 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.

In addition, the staff finds as discussed above that sufficient regulatory controls exist to assure continued protection of the public health and safety. Accordingly, the staff has concluded that these requirements may be relocated from the TSs to the above specified documents. The finalization of the proposed FSAR Chapter 17.2 changes will need to be completed during the implementation of this TS.

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 changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

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