March 18, 1996

Mr. C. Lance Terry
Group Vice President, Nuclear
TU Electric
400 North Olive Street, L.B. 81
Dallas, TX 75201

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - AMENDMENT NOS. 48 AND 34 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89 (TAC NOS. M94169 AND M94168)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 48 and 34 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 21, 1995 (TXX-95289), as supplemented by letters dated February 22 (TXX-96061 and TXX-96062) and 28, (TXX-96068), and March 13, 1996 (TXX-96090).

The amendments allow both doors of the containment personnel airlock to be open during fuel movement and core alterations, providing one airlock door is capable of being closed and the water level in the refueling pool is maintained.

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. 48 to NPF-87
2. Amendment No. 34 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

March 18, 1996

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. 48 AND 34 TO FACILITY OPERATING LICENSE NOS. NPF-87 AND NPF-89 (TAC NOS. M94169 AND M94168)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment Nos. 48 and 34 to Facility Operating License Nos. NPF-87 and NPF-89 for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 21, 1995 (TXX-95289), as supplemented by letters dated February 22 (TXX-96061 and TXX-96062) and 28, (TXX-96068), and March 13, 1996 (TXX-96090).

The amendments allow both doors of the containment personnel airlock to be open during fuel movement and core alterations, providing one airlock door is capable of being closed and the water level in the refueling pool is maintained.

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,

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. 48 to NPF-87
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3. Safety Evaluation

cc w/encls: See next page

Mr. C. Lance Terry
TU Electric Company

Comanche Peak, Units 1 and 2

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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. 48
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 November 21, 1995 (TXX-95289), as supplemented by letters dated February 22 (TXX-96061 and TXX-96062) and 28, (TXX-96068), and March 13, 1996 (TXX-96090), 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.

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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:

   2. Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 48, 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.

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: March 18, 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. 34
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 November 21, 1995 (TXX-95289), as supplemented by letters dated February 22 (TXX-96061 and TXX-96062) and 28, (TXX-96068), and March 13, 1996 (TXX-96090), 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. 34, 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.

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: March 18, 1996

ATTACHMENT TO LICENSE AMENDMENT NOS. 48 AND 34

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
3/4 9-4	3/4 9-4
3/4 9-4a	3/4 9-4a
B 3/4 9-1	B 3/4 9-1

3/4.9.3 DECAY TIME

LIMITING CONDITION FOR OPERATION

3.9.3 The reactor shall be subcritical for at least 100 hours.

APPLICABILITY: During movement of irradiated fuel in the reactor vessel.

ACTION:

With the reactor subcritical for less than 100 hours, suspend all operations involving movement of irradiated fuel in the reactor vessel.

SURVEILLANCE REQUIREMENTS

4.9.3 The reactor shall be determined to have been subcritical for at least 100 hours by verification of the date and time of subcriticality prior to movement of irradiated fuel in the reactor vessel.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment hatch closed and held in place by a minimum of four bolts,

b. A minimum of one door in the emergency airlock is closed and one door in the personnel airlock is capable of being closed*, and

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

1) Closed by an isolation valve, blind flange, or manual valve, or

2) Be capable of being closed by an OPERABLE automatic containment ventilation isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

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* Administrative controls shall ensure that:

1) Appropriate personnel are aware that both personnel airlocks doors are open,

2) A specified individual(s) is designated and available to close the airlock following a required evacuation of containment, and

3) Any obstruction(s) (e.g., cables and hoses) that could prevent closure of an open airlock be capable of being quickly removed.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required containment building penetrations shall be determined to be either in its required condition or capable of being closed by an OPERABLE automatic containment ventilation isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:

a. Verifying that,

   1. Containment ventilation isolation occurs on a high radiation test signal from a containment atmosphere gaseous monitoring instrumentation channel and the containment ventilation isolation valve(s) can be closed remotely from the control room, or

   2. the containment ventilation isolation valve(s) are closed/ isolated.

b. Verifying the remaining penetrations of 3.9.4, not covered by a. above, are in their required condition.

3/4.9.6 REFUELING MACHINE

The OPERABILITY requirements for the refueling machine main hoist and auxiliary monorail hoist ensure that: (1) the main hoist will be used for movement of fuel assemblies, (2) the auxiliary monorail hoist will be used for latching, unlatching and movement of control rod drive shafts, (3) the main hoist has sufficient load capacity to lift a fuel assembly (with control rods), (4) the auxiliary monorail hoist has sufficient load capacity to latch, unlatch and move the control rod drive shafts, and (5) the core internals and reactor vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations.

3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE AREAS

The restriction on movement of loads in excess of the nominal weight of a fuel and control rod assembly and associated handling tool over other fuel assemblies in a storage pool ensures that in the event this load is dropped: (1) the activity release will be limited to that contained in a single fuel assembly, and (2) any possible distortion of fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the safety analyses.

3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that: (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and at least 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: (1) the reactor will remain subcritical during CORE ALTERATIONS, and (2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analyses. The value of 0.95 or less for K_{eff} includes a 1% $\Delta k/k$ conservative allowance for uncertainties. Similarly, the boron concentration value of 2400 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron. The locking closed of the required valves during refueling operations precludes the possibility of uncontrolled boron dilution of the filled portion of the RCS. This action prevents flow to the RCS of unborated water by closing flow paths from sources of unborated water.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short-lived fission products. This decay time is consistent with the assumptions used in the safety analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material from containment will be minimized. The OPERABILITY and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in the REFUELING MODE.

Both containment personnel airlock doors may be open during movement of irradiated fuel or during core alterations provided one airlock door is capable of being closed and water level in the refueling cavity is maintained as required.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 48 AND 34 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 November 21, 1995 (TXX-95-95289), as supplemented by letters dated February 22 (TXX-96061 and TXX-96062) and 28, (TXX-96068), and March 13, 1996 (TXX-96090), 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. The proposed changes would allow both doors of the containment personnel airlock (PAL) to be open during fuel movement and core alterations, providing one airlock door is capable of being closed and the water level in the refueling pool is maintained. The February 22 and 28, and March 13, 1996, supplemental letters were clarifying in nature and did not change the initial no significant hazards consideration determination.

2.0 BACKGROUND

CPSES, Units 1 and 2 are each equipped with three (3) containment access penetrations; the equipment hatch, the emergency airlock, and the PAL. The PAL consists of a cylinder breaching the containment wall, opening into the Safeguards Building at elevation 832 ft. The PAL is the normal means for personnel to access containment. Each end of the airlock has a 9 ft diameter door. The doors are held closed by hydraulically operated locking rings. Interlocks are provided to prevent inadvertent simultaneous opening of both doors. Currently, TS 3/4.9.4 requires that one personnel airlock door be closed during core alterations and movement of irradiated fuel within the containment. Because of the ongoing work in containment, a large number of personnel enter and exit through the PAL and the PAL doors are cycled frequently.

The frequent use of the PAL during outages has challenged the ability of the PAL doors to open and close in a reliable manner. This is due to the size and weight of the PAL doors and the complexity of the hydraulic system. The demands of outage entries into the containment have caused failures of the door and subsequent delays in containment egress. The recorded failures are primarily associated with components that have come out of adjustment or degraded due to the demands of outage service. Allowing the airlock to remain open rather than frequently cycling the components for the duration of Mode 6 will improve the availability of the system.

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3.0 EVALUATION

The current CPSES TS 3/4.9.4, "Containment Building Penetrations," requires that a minimum of one PAL door, as well as other containment penetrations, be closed during fuel movement and core alterations. This requirement is to prevent the release of radioactive material in the event of a fuel handling accident. The proposed TS changes would allow both doors of the containment PAL to be open during fuel movement and core alterations, provided one airlock door is capable of being closed and the water level in the refueling pool is maintained as required. The TS will also ensure that one airlock door is operable, that at least 23 feet of water is maintained over the fuel (TS 3.9.9.1), and that fuel is not moved until at least 100 hours after shutdown (TS 3.9.3). As indicated in the TS 3/4.9.4, administrative controls will insure (1) that appropriate personnel will be readily available to close the airlock in the event of a fuel handling accident (FHA) and (2) that any cables or hoses running through the open airlock will be designed for quick removal.

The licensee recalculated the doses and revised the design basis for the fuel handling accident analysis to be consistent with Regulatory Guide (RG) 1.25, "Assumption Used for Evaluating the Potential Radiological Consequences of a Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors." Neither the current nor the revised design basis FHA analysis takes credit for the containment building barriers. The licensee's analysis calculated the doses for the 0-2 hour period at the exclusion area boundary. These calculated doses are within the Standard Review Plan (SRP) criteria. The licensee also calculated the doses to the control room personnel, and these doses are within the dose acceptance criteria of General Design Criterion 19.

The NRC staff has completed its evaluation of the potential radiological consequences of a fuel handling accident at CPSES based upon the conditions of the proposed TS changes. In addition to reviewing the licensee's submittal the staff performed an independent analysis to determine conformance with the requirements of 10 CFR Part 100 and General Design Criteria (GDC) 19 of Appendix A to 10 CFR Part 50. The staff analysis utilized the accident source term given in RG 1.4, the assumptions contained in RG 1.25, and the review procedures specified in SRP Sections 15.7.4 and 6.4. The staff assumed an instantaneous puff release of noble gases and radioiodine from the gap and plenum of the broken fuel rods. These gas bubbles will pass through at least 23 feet of water covering the fuel prior to reaching the containment atmosphere. All airborne activity reaching the containment atmosphere is assumed to exhaust to the environment within 2 hours. As stipulated in the plant TSs, the gap activity is assumed to have decayed for a period of 100 hours.

The NRC staff computed the offsite doses for CPSES using the assumptions described above and NRC's ACTICODE computer code. Control room operator doses were determined using the methodology in SRP Section 6.4, including use of the Murphy-Campe methodology for calculations of the meteorological factors. The computed offsite doses and control room operator doses are within the

acceptance criteria given in SRP Section 15.7.4 and GDC 19. The resulting calculated values and the assumptions used in calculating those doses are attached in Tables 1 and 2, respectively.

The NRC staff's dose calculation was based on the assumption that all of the radioactive material released to the containment escapes the containment within 2 hours. However, the NRC has historically required plant TSs to maintain containment closure during core alterations and fuel handling as a defense-in-depth measure to further limit releases. Recently the staff has allowed changes to plant TSs to keep both doors to a containment air lock open during core alterations and fuel handling with the provisions in place to close one door quickly, thereby reestablishing containment closure. The provisions described in this safety evaluation provide reasonable assurance that containment closure as a defense-in-depth measure can be reestablished quickly to limit releases much lower than assumed in the dose calculations.

The NRC staff has reviewed the licensee's analysis and has performed an independent assessment of the radiological consequences resulting from a fuel handling accident during refueling operations with the containment airlocks open. The staff concludes that the radiological consequences associated with this accident are within the acceptance criteria set forth in 10 CFR Part 100 and the control room operator dose criteria specified in GDC 19 of Appendix A to 10 CFR Part 50 and are acceptable.

TABLE 1

CALCULATED RADIOLOGICAL CONSEQUENCES
(rem)

Exclusion Area Boundary	Dose	SRP 15.7.4 Guidelines
Whole Body	0.15	6
Thyroid	51.	75

Control Room Operator	Dose	GDC-19 Guidelines
Whole Body	0.07	5
Thyroid	1.1	Equivalent to 5 rem whole body*

* Guideline doses provided in Standard Review Plan Section 6.4 define the dose-equivalent as 30 rem to the thyroid.

TABLE 2

ASSUMPTIONS USED FOR CALCULATING RADIOLOGICAL CONSEQUENCES

Parameters	Quantity
Power Level (Mwt)	3565
Number of Fuel Rods Damaged	264
Total Number of Fuel Rods	50,913
Shutdown time, hours	100
Power Peaking Factor*	1.65
Fission Product Release Duration	2 hours
Release Fractions*	
Iodine	12%
Noble Gases	10%
Krypton Gas	30%
Iodine Forms*	
Elemental	75%
Organic	25%
Core Fission Product Inventories per TID-14844	
Receptor Point Variables	
Exclusion Area Boundary**	
Atmospheric Relative Concentration, X/Q (sec/m^3) 0-2 hours	1.5×10^{-4}
Control Room	
Atmospheric Relative Concentration, X/Q (sec/m^3)	1.6×10^{-3}
Control Room Volume, cubic feet	4.2×10^{5}
Filter Recirculation rate, ft^3/min	7200

* Regulatory Guide 1.25
** CPSES SER

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 changes 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 (61 FR 185). 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: John Minns

Date: March 18, 1996