

September 4, 2002

Mr. C. Lance Terry
Senior Vice President
& Principal Nuclear Officer
TXU Energy
ATTN: Regulatory Affairs
P. O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 -
ISSUANCE OF AMENDMENTS RE: UNIT STAFF QUALIFICATIONS
(TAC NOS. MB4732 AND MB4733)

Dear Mr. Terry:

The Commission has issued the enclosed Amendment No. 100 to Facility Operating License No. NPF-87 and Amendment No. 100 to Facility Operating License No. NPF-89 for CPSES, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated March 27, 2002.

The amendments revise TS 5.3.1 to require that each member of the unit staff, with the exception of licensed Reactor Operators (ROs) and licensed Senior Reactor Operators (SROs), shall meet or exceed the minimum qualifications of Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, 1987. Also, a new TS 5.3.2 is added to require that the ROs and SROs shall meet or exceed the minimum qualifications of RG 1.8, Revision 3, May 2000, and the current TS 5.3.2 is renumbered to TS 5.3.3.

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,

/RA/

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosures: 1. Amendment No. 100 to NPF-87
2. Amendment No. 100 to NPF-89
3. Safety Evaluation

cc w/encls: See next page

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RDennig
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** No legal objection

Accession No.: ML022200571 *Memo dated 7/31/02 (ML022070046) without major changes

OFFICE	PDIV-1/PM	PDIV-1/LA	OEJBSC*	OGC**	PDIV-1/SC
NAME	DJaffe	DJohnson	DTrimble	BSmith	RGramm
DATE	8/16/02	8/15/02	7/31/02	9/03/02	9/4/02

OFFICIAL RECORD COPY

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

Amendment No. 100
License No. NPF-87

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by TXU Generation Company LP dated March 27, 2002, 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:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 100 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TXU Generation Company LP 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 and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: September 4, 2002

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

Amendment No. 100
License No. NPF-89

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by TXU Generation Company LP dated March 27, 2002, 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. 100 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TXU Generation Company LP 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 and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: September 4, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 100

TO FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 100

TO FACILITY OPERATING LICENSE NO. NPF-89

DOCKET NOS. 50-445 AND 50-446

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

Insert

5.0-5

5.0-5

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 100 TO
FACILITY OPERATING LICENSE NO. NPF-87
AND AMENDMENT NO. 100 TO
FACILITY OPERATING LICENSE NO. NPF-89
TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated March 27, 2002, TXU Generation Company LP (the licensee) requested changes to the Technical Specifications (TSs) for the Comanche Peak Steam Electric Station, Units 1 and 2. The proposed changes would revise TS 5.3.1 to require that each member of the unit staff, with the exception of licensed Reactor Operators (ROs) and licensed Senior Reactor Operators (SROs), shall meet or exceed the minimum qualifications of Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, 1987. Also, a new TS 5.3.2 would be added to require that the ROs and SROs shall meet or exceed the minimum qualifications of RG 1.8, Revision 3, May 2000, and the current TS 5.3.2 would be renumbered to TS 5.3.3.

2.0 BACKGROUND

On March 20, 1985, the U.S. Nuclear Regulatory Commission (NRC or the Commission) issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel which endorsed the training accreditation process and the National Academy for Nuclear Training (NANT). In Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR [Part] 55 and Conforming Amendments," dated March 19, 1987, and in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, *Code of Federal Regulations*, Part 55 on Operators' Licenses," published November 1987, the NRC indicated it would accept a facility's licensed operator training program if the facility certified in writing that the program was accredited and based on a systems approach to training (SAT). This certification would supersede the requirements of American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," and ANSI/American Nuclear Society (ANS) 3.1-1978, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." Facility licensees were advised to submit a request to the NRC for a change to their TSs to revise or delete, as appropriate, the requirements that had been superseded.

In 1992 the NRC published its proposed rule 10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel." The proposed rule stated that, if adopted, the rule would supersede the Policy Statement on Training and Qualification of Nuclear Power Plant Personnel and would not result in any change to accredited programs. The Commission concluded that accredited programs, implemented consistent with industry objectives and criteria, would be in compliance with this regulation. In April 1993, the NRC published its final rule on training and qualification of nuclear power plant personnel. The rule requires nuclear power plant licensees to establish, implement, and maintain SAT-based training programs for nine non-licensed positions. Accreditation of these nine training programs is an acceptable means of meeting the requirements of 10 CFR 50.120.

On January 18, 2001, the NRC published NRC Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," to familiarize licensees with the NRC's current guidelines for the qualification and training of RO and SRO applicants. RIS 2001-01 acknowledged that 10 CFR 55.31(a)(4) allows the NRC to accept an application for an operator's license if the facility licensee certifies that the applicant has successfully completed a Commission-approved training program that is based on a SAT. In addition, RIS 2001-01 stated that: (1) a training program would be considered approved by the NRC when it receives or renews accreditation from the National Nuclear Accrediting Board (NNAB); (2) accreditation of operator training programs suggests that facilities are implementing the education and experience guidelines endorsed by the NNAB; (3) NANT guidelines for education and experience (those in effect in 1987 or those issued in January 2000) outline acceptable methods for implementing the Commission's regulations; and (4) the staff encourages all facility licensees to review their requirements and commitments related to licensed operator and senior operator education and experience and to update their documentation (e.g., Final Safety Analysis Report, TSs, and training program descriptions) to "enhance consistency and minimize confusion."

3.0 EVALUATION

The proposed TS change would revise TS 5.3, "Unit Staff Qualifications." The requested revision would update requirements that had been outdated based on licensed operator training programs being accredited by the Institute of Nuclear Power Operations and promulgation of the revised 10 CFR Part 55, "Operators' Licenses." TS Section 5.3 describes the requirements for unit staff qualifications. These changes conform to the current requirements of 10 CFR Part 55. The TS requirements for all other unit staff qualifications remain unchanged.

The NRC staff concludes that the revised qualification requirements in TS 5.3 are adequate because they conform with the reactor operator and senior reactor operator license eligibility criteria and standards acceptable to the NRC. In addition, the changes will not affect the 10 CFR 50.36(c)(5) requirement to ensure the licensee maintains administrative controls that assure the operation of the facility in a safe manner.

Based on the above discussion, the proposed revision to TS Section 5.3, including proposed changes to TS 5.3.1, a new TS 5.3.2, and renumbering the current TS 5.3.2 as TS 5.3.3, is consistent with 10 CFR Part 55 and does not adversely affect nuclear safety or plant operations.

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 relate to changes in 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Pelton

Date: September 4, 2002

Comanche Peak Steam Electric Station

cc:

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