TXU

TXU Energy
Comanche Peak Steam
Electric Station
P.O. Box 1002 (E01)
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lance.terry@txu.com

C. Lance Terry
Senior Vice President &
Principal Nuclear Officer

Ref: 10CFR50.90

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File # 00236

July 10, 2003

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
LICENSE AMENDMENT REQUEST LAR 03-05
ONE-TIME CHANGE TO TECHNICAL SPECIFICATION (TS) 3.7.10,
CONTROL ROOM EMERGENCY FILTRATION/PRESSURIZATION SYSTEM
(CREFS) COMPLETION TIME

Gentlemen:

Pursuant to 10CFR50.90, TXU Generation Company LP (TXU Energy) hereby requests an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating the attached change into the CPSES Unit 1 and 2 Technical Specifications. This change request applies to both units..

The proposed one-time change for each unit will revise TS 3.7.10 entitled "Control Room Emergency Filtration /Pressurization System (CREFS)" to extend the completion time for ACTION B, "Two CREFS Trains inoperable due to inoperable Control Room boundary" from 24 hours to 14 days for implementation of the Turbine Control Digital Modification currently scheduled during the seventh refueling outage for Unit 2 (2RF07) and the tenth refueling outage for Unit 1 (1RF10). The descriptions of CONDITION A and CONDITION E will also be revised for implementation of the Turbine Control Digital Modification.

Attachment 1 provides a detailed description of the proposed change, a safety analysis of the proposed change, TXU Energy's determination that the proposed change does not involve a significant hazard consideration, a regulatory analysis of the proposed change and an environmental evaluation. Attachment 2 provides the affected Technical Specification pages marked-up to reflect the proposed changes. Attachment 3 provides a proposed change to the Technical Specification Bases for information only. Attachment 4 provides the retyped Technical Specification pages which incorporate the requested changes. Attachment 5 provides the retyped Technical Specification Bases page which incorporate the proposed change. These changes will be processed per CPSES site procedures.

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TXU Energy requests approval of the proposed License Amendment by September 30, 2003 to be implemented within 30 days of the issuance of the license amendment. The approval date was selected to support the implementation of the Turbine Control Digital modification during 2RF07 currently scheduled to start October 4, 2003. This modification will require breaching the Control Room Pressure boundary for times in excess of the current Completion Time of 24 hours. 1RF10 is scheduled for Spring, 2004.

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

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

Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725 or e-mail at jhicks1@txu.com.

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

Executed on July 10, 2003.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

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

By: Roger D. Walker
Roger D. Walker
Regulatory Affairs Manager

JCH/jch

Attachments
1. Description and Assessment
2. Markup of Technical Specifications Pages
3. Markup of Technical Specifications Bases Page (for information only)
4. Retyped Technical Specification Pages
5. Retyped Technical Specification Bases Page (for information only)

c - T. P. Gwynn, Region IV
W. D. Johnson, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES

Mr. Authur C. Tate
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

ATTACHMENT 1 to TXX-03096

DESCRIPTION AND ASSESSMENT

LICENSEE'S EVALUATION

1.0 DESCRIPTION

By this letter, TXU Energy requests an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating the attached one-time change for each unit into the CPSES Unit 1 and 2 Technical Specifications (TS). Proposed change License Amendment Request (LAR) 03-05 is a request to revise Technical Specifications (TS) 3.7.10, "Control Room Emergency Filtration/Pressurization System (CREFS)" for Comanche Peak Steam Electric Station (CPSES) Units 1 and 2.

CPSES has a Common Control Room and one unit will be operating and the other unit will be in an outage during implementation of the Turbine Control Digital Modification. The specifications for the control room ventilation systems allow the pressure boundary to be inoperable for up to 24 hours. The LCO is modified by a note that states "The Control Room Boundary may be opened intermittently under administrative controls." In the upcoming Unit 2 fall refueling outage (2RF07) and Unit 1 spring refueling outage (1RF10), there is a planned Turbine Control Digital Modification that will require floor penetrations in the Control Room boundary be opened to accommodate installation. The planned opening of the Control Room boundary will span a period of several days and will require eight 8" X 9" cable penetration "blockouts" be opened between the Control Room and Cable Spreading Room. In addition, 4" conduits may also be opened to accommodate cable pulls. In some cases multiple penetrations will be simultaneously open. Consistent with the LCO note, the administrative controls for these openings will consist of stationing a dedicated individual at the openings, who is in continuous communication range (i.e. audible range) with the control room operator. This individual will have a suitable method and resources to rapidly close the openings when needed for control room isolation (e.g. plastic sheeting and duct tape, penetration seal material such as silicone foam used for fire seals, etc.). Conservative estimate of the time to seal all openings is two hours with cables running through all eight 8" X 9" cable penetration blockouts. Therefore, CPSES requests a one time extension of the required completion time associated with an inoperable Control Room boundary. The extension requested is from 24 hours to 14 days.

A key element of this change is associated with CONDITION B. The COMPLETION TIME of CONDITION B.1 (Restore control room pressure boundary to OPERABLE status) is extended from 24 hours to 14 days. This particular change to CONDITION B is requested to support the implementation of the Turbine Control Digital Modification during the upcoming Unit 2 refueling outage (2RF07). An approval date of September 30, 2003 will accommodate this request. This change will also be needed for the next Unit 1 refueling outage (1RF10) scheduled for Spring, 2004.

The description for CONDITION A is being revised to allow the operating unit to continue operating after 7 days with an inoperable Control Room boundary. The description for CONDITION E is being revised to allow movement of irradiated fuel assemblies during implementation of the Turbine Control Digital Modification.

No changes to the CPSES Final Safety Analysis Report are anticipated at this time as a result of the License Amendment Request.

2.0 PROPOSED CHANGE

The proposed change revises the Completion Time for ACTION B and the descriptions for CONDITION A and CONDITION E.

The revised ACTION is associated with CONDITION B of the control room ventilation specification. CONDITION B is revised to provide a 14 day Completion Time for two control room ventilation trains inoperable due to an inoperable control room boundary during the installation of the Turbine Control Digital Modification in 2RF07 and 1RF10.

The description for CONDITION A, "One CREFS train inoperable" is being revised by adding "for reasons other than Condition B." This allows the operating unit to continue operating after 7 days with an inoperable Control Room boundary.

The description for CONDITION E, "Two CREFS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies" is being revised by adding "except for up to 14 days for a one time implementation for each unit of the Turbine Control Digital Modification to be completed during 2RF07 and 1RF10." This allows movement of irradiated fuel assemblies during implementation of the Turbine Control Digital Modification.

In summary, a TS 3.7.10 change is requested to allow the Control Room boundary to be intermittently opened (and declared inoperable) during the installation of the Turbine Control Digital Modification in 2RF07 and 1RF10 for a time not to exceed 14 days per outage. 14 days is requested because the current schedule shows that the Control Room pressure boundary will be declared inoperable 11 days. 14 days allows some margin that may be required due to unforseen implementation schedule changes.

For Information only, this LAR includes proposed associated changes to the Technical Specification Bases. The Bases are revised to reflect the above TS changes.

3.0 BACKGROUND

The CPSES Control Room Emergency Filtration/Pressurization System (CREFS) design is zone isolation, with filtered recirculation air, and with a positive pressure. This design maximizes the iodine protection factors and minimizes the dose from iodine. The total unfiltered infiltration rate in the control room is conservatively assumed to be 12 cfm, including 10 cfm due to ingress/egress and 2 cfm leakage from the ductwork passing through the control room pressure boundary. Filtered inleakage through the closed dampers due to the pressure differential is also included. The damper leakage air will be filtered by the recirculation filtration units.

Because the control room door ingress/egress is to a stairwell which is equivalent to a two-door vestibule, backflow will not occur with the CPSES CREFS design and the 10 cfm is not applicable per SRP 6.4. The ductwork has all welded joints which were leak tested prior to operation. Therefore, the assumed unfiltered inleakage from adjacent areas is conservative with respect to the SRP review criteria.

The Control Room Habitability is maintained by limiting the inleakage of potentially contaminated air into the Control Room Envelope. The potential leakage paths for the Control Room Envelope include the control room enclosure (e.g., walls, penetrations, floors, ceilings, joints, etc.), and other potential paths such as pressurized ductwork from other HVAC systems, pressurized air systems (e.g., instrument air) or isolated HVAC intakes.

The CPSES Technical Specifications surveillances require that the control room ventilation system be capable of maintaining positive pressure in the control room relative to adjacent areas. The Bases for this surveillance states that it verifies capability of the CREFS to pressurize the control room envelope. The Bases goes on to state that a positive pressure of 0.125 inches water gauge in the control room with respect to adjacent areas helps to minimize the unfiltered inleakage into the control room boundary. This function was designed to ensure the integrity of the control room enclosure by limiting the actual unfiltered inleakage rate of the potentially contaminated air to a value below that assumed in the safety analyses. If the Control Room is at a positive pressure with respect to all interior and exterior areas adjacent to the boundary, leakage through the boundary from the low pressure adjacent areas to the higher pressure Control Room side is minimized. While this pressurization will not preclude 1) inleakage from adjacent areas that are at a higher pressure than that of the Control Room boundary, 2) inleakage from plant systems that penetrate the Control Room boundary, and are maintained at a higher pressure than that of the surrounding Control Room environment (provided the system breach occurs within the Control Room boundary) and 3) entrainment of contaminants into the Control Room environment through the seals on the suction side of the CREFS equipment (ducts seams, fan shaft seals, housing inspection doors etc), it is still an integral safety feature relied upon to meet GDC 19 requirements. The inability to pressurize the Control Room boundary puts the plant and its operators in a vulnerable condition which may result in excessive dose to the operators as well as the general public. It is noted that the three limitations of the pressurization test (described above) are under evaluation by CPSES, the NRC, and the industry through NEI and are not specifically addressed in this request for a one time extension of the COMPLETION TIME for CONDITION B.

The philosophy at CPSES has been to declare the boundary inoperable at the time it becomes known that there is a hole in the boundary that exceeds a pre-determined limit. The boundary is declared operable at the time when the opening is sufficiently sealed. The Control Room is sufficiently sealed when the determination can be made that the ability to pressurize the boundary to 0.125 inches water gauge at less than or equal to 800 cfm of makeup air is restored.

The note that modifies the LCO has been typically only used for the opening and closing of the control room doors for normal ingress and egress. So, for normal ingress and egress, the boundary is not considered to be inoperable. Furthermore, CPSES has determined a limiting set of Control Room boundary openings that may exist and not render the Control Room pressure boundary inoperable. In other words, if a hole in the boundary is less than a specified size (square inches) then one train of the control room pressurization units is capable of pressurizing the envelope to 0.125 inches water gauge at less than or equal to 800 cfm of makeup air. If planned maintenance or modifications will breach the boundary, the size of the opening is compared

against the maximum allowable. If the breach exceeds the maximum allowable, the boundary is typically declared inoperable and must be restored within 24 hours.

During the period that any known breach exists, administrative controls are in place to address the breach commensurate with the size, expected duration, and location of the breach. Administrative controls and compensatory measures, in some cases, extend beyond the TS pressurization requirement. For example, security and fire protection may have their own set of actions to implement based on the size and location of the boundary breach. The need for administrative controls relative to Control Room boundary breaches are already established within existing site programs. This application for a one time extension of the COMPLETION TIME for CONDITION B will not affect the CPSES adherence to the use of any of the existing programs for these administrative controls/compensatory measures. This request is only to accommodate the known implementation schedule of the planned modification described in Section 1. In other words, the boundary will be knowingly breached under administrative controls. It may be required that CPSES be in the LCO of 3.7.10 for one extended duration or it may be that multiple entries and exits from the LCO of 3.7.10 are required to implement the proposed modification. In either case, the amount of time that CPSES will be in the LCO for T.S. 3.7.10 exceeds the current amount allowed. The amount of time will exceed 24 hours but it is not expected that the inoperable time will exceed 14 days. This one time extension will allow CPSES to install this particular modification within the bounds of current philosophy.

4.0 TECHNICAL ANALYSIS

The proposed change will modify Technical Specifications only during 2RF07 and 1RF10 to accommodate the implementation of the Turbine Control Digital Modification. Specifically, the COMPLETION TIME for CONDITION B is extended from 24 hours to 14 days. The acceptability of this temporary change is addressed below in this section. It is important to note that the discussions below are applicable only to breaches in the Control Room boundary that are made to accommodate the Turbine Digital Control Modification. This modification will create a breach between the Control Room and the Cable Spreading Room for the implementing unit. Therefore the breach locations and magnitude are known prior to entering the LCO for T.S. 3.7.10. The control room habitability (GDC 19) aspects of the described change are discussed in the following paragraphs. Toxic gas and smoke are addressed first followed by radiological impacts.

Toxic Gas and Smoke

The location and layout of CPSES is such that the threat of smoke or toxic gas from offsite sources is not credible. Chemicals and combustibles are controlled such that the threat of smoke and toxic gas from onsite sources is negligible. However, if the need for toxic gas or smoke protection arises, the CPSES Control Room ventilation line-up is the isolation mode which does not pressurize the boundary. In the isolation mode, the Control Room HVAC system is used to recirculate the air within the envelope. In this mode, the control room is not pressurized and the pressure boundary is not critical. For this particular modification, the boundary breach will be in the floor of the Control Room/Ceiling of the Cable Spreading Room. Given that the boundary

breach for this modification is not on the Control Room exterior that is exposed to outside atmosphere, there are only two ways for smoke or toxic gas to be drawn into the Control Room ventilation and circulated throughout the Control Room Volume in the isolation mode: 1) if the location of a toxic gas or smoke source is in the Cable Spreading Room; or 2) if the toxic gas or smoke is discharged into the Cable Spreading Room via the Uncontrolled Access Area Ventilation (the intakes are exterior to the plant). The Cable Spreading Room is in the same fire safe shutdown area as the main control room; so, a fire in the cable spreading room is no different than a fire in the control room. In this case, when the boundary between the cable spreading room and control room is breached, fire protection requirements will cause a continuous fire watch to be implemented in the cable spreading room. If the source is outside the cable spreading room and it becomes necessary, the Uncontrolled Access Area Ventilation supply and exhaust could be secured to eliminate this potential source of smoke or toxic gas. However, as previously stated, onsite sources of chemicals and combustibles are administratively controlled and offsite sources are not credible, so a breach in this location will not significantly challenge control room habitability as it relates to smoke or toxic gas. It is also noted that if for some reason the Control Room becomes uninhabitable due to toxic gas or smoke, the operators would relocate to the remote shutdown panel in the Safeguards Building. Therefore, the time interval over which the boundary integrity in this particular location is lost is not relevant and the one time extension of the COMPLETION TIME from 24 hours to 14 days is acceptable from a smoke and toxic gas perspective. However, in the event that a toxic gas or smoke threat becomes apparent, it is prudent to take measures to close the boundary breach with readily available methods.

Radiological Impacts

The primary safety function of the Control Room Emergency Filtration/Pressurization System (CREFS) at CPSES is to limit the amount radioactive contaminants that infiltrate the Control Room prior to passing through filter banks. The largest source of potential radioactive contaminants is nuclear fuel/reactor core damage followed by a subsequent release to the atmosphere. The other significant source of potential radioactive contaminants is the failure of a radioactive waste system followed by a subsequent release to the atmosphere. At CPSES, control room habitability is evaluated for the following Design Basis events.

Large Break Loss of Coolant Accident
Main Steam Line Break Accident
Steam Generator Tube Rupture Accident
Small Break Loss of Coolant Accident (3" CVCS Line Break Outside Containment)
Rod Ejection Accident
RCP Locked Rotor Accident
Fuel Handling Accident
Gas Decay Tank Rupture Accident
Radioactive Liquid Waste Tank Rupture Accident

Administrative controls will be in place to restore the boundary to operable rapidly following the onset of any accident. Even though the dose analyses assume a large, instantaneous, ground level release of radioactivity, it is acceptable to account for 1) likelihood of the event, 2) expected

delays in the release 3) realistic quantities of radioactivity when assessing the time requirements associated with the restoration of Control Room boundary operability.

The probability of any of the above Design Basis Accidents occurring during the time period when the control room boundary is degraded is very low. More specific justification for each individual accident is provided in the following paragraphs.

Large Break Loss of Coolant, Rod Ejection and RCP Locked Rotor Accidents

These accidents are applicable only to the operating unit.

Although the design basis LOCA is typically the maximum credible accident, the design basis accidents (DBAs) were not intended to be actual event sequences, but rather, were intended to be surrogates to enable deterministic evaluation of the response of a facility's engineered safety features. These accident analyses were intentionally conservative in order to compensate for known uncertainties in accident progression, fission product transport, and atmospheric dispersion. The potential radioactive release paths for these accidents occur from leakage from the containment atmosphere and exhaust from buildings containing radioactive systems.

Based on Regulatory Guide 1.183, the alternate source term based on the post-TMI accident, only the gap activity is assumed to be released in the first 30 minutes (i.e. 0.5 hours). Any radioactivity that is released in containment will be significantly held up and only a small fraction of what is assumed in the radiological analyses will actually be released to the atmosphere. The latest containment leak rate measurement results are tabulated below against the CPSES limits.

Unit	As left Value (sccm)	Limit (sccm)*
1	10,595.79	151,000
2	7422.32	151,000

*The limit of 151,000 sccm is equivalent to 0.6 L_A and the TS limit is 1.0 L_A.

The control room pressure boundary is not adjacent to any rooms of the Auxiliary or Safeguards buildings at CPSES which contain containment penetrations or engineered safety feature (ESF) systems which recirculate reactor coolant before, during or after an accident. The Control Room HVAC System, which includes both the CREFS and CRACS, is located totally within the control room envelope (i.e., pressure boundary). The Electrical and Control (E&C) Building and Control Room fresh air intakes are West of the Primary Plant buildings (Containment Buildings, Safeguards Buildings, Auxiliary Building, and Fuel Building). The distance from the Containment to the control room air intake is 94 feet, and the air intake is located 56 feet above ground. The distance from the primary plant vent stack (i.e., the ESF leakage release point) to the closest air intake is 138 feet.

The Cable Spreading Rooms, located below the control room, are served by the Uncontrolled Access Area Ventilation System described in CPSES FSAR Section 9.4C.4. The Uncontrolled Access Area Ventilation System supply and exhaust are located in the Office and Service Area

Equipment Room (X-151 at El. 854' in the E&C Building adjacent to the CREFS and CRACS equipment room. The fresh air intake is located on the West side of the E&C Building.

Any radioactivity that is released through leakage in the ECCS and Containment Spray paths outside containment will be carried away through the Primary Plant Ventilation where it is filtered at a minimum efficiency of 95% and then discharged into the atmosphere approximately 100 feet East of and 140 feet above the Control Room Ventilation intake ducts. The predominant wind direction during the period when this proposed COMPLETION TIME extension will be applicable is from the South. As can be seen with the wind direction frequency distribution at CPSES [FSAR Figure 2.3-10], the predominate winds are at approximately 90 degree angles to the path from the ventilation exhaust to the control room intakes. By inspection of the building layout, it is evident that for either of the Primary Plant Ventilation exhausts to be directed towards either of the Control Room intakes, the wind must have an East to West component. Based on FSAR Table 2.3-25, the wind in this region of Texas blows from the easterly direction (NE through SE) only 26% of the time.

These accidents will not result in signals which will automatically trip Uncontrolled Access Area Ventilation. However, plant communications, indications, and alarms provide the operator with ample warning before radioactive releases could reach the intakes. Therefore, the supply and exhaust fans can be stopped using existing operating procedures well before any radiological hazard from accidents inside containment could reach the intake thus eliminating the path for significant unfiltered air to enter the Cable Spreading room via the intake on the West side of the E&C Building. Stopping these fans will result in an alternate fresh air intake path to open into the Office and Service Area HVAC equipment room adjacent to the control room envelope to supply the battery room exhaust fans; however, the Class 1E redundant battery room exhaust fans will ensure the Office and Service Area HVAC equipment room is negative with respect to the control room envelope.

The supply to each of the two stairwells that connects to the control room envelope is the Uncontrolled Access Area Ventilation supply which would be stopped as described above.

These accidents will automatically align the HVAC systems for the Auxiliary and Safeguards buildings and rooms adjacent to the Control Room such that the pressure in these buildings and rooms is negative relative to atmospheric pressure and therefore will also necessarily be at a lower pressure than the control room. Even if the Control Room Ventilation cannot pressurize to 0.125 inches of water gauge there will still be no leakage into the control room envelope from the adjacent buildings and rooms which contain radioactive systems and containment penetrations.

The control room boundary is well sealed as demonstrated by the fact that a pressure of 0.125 inches of water gauge can be maintained with far less than 800 cfm of makeup air. Even if the Control Room Ventilation can not pressurize to 0.125 inches of water gauge there will still be no radioactive leakage into the envelope through the exterior walls and the roof. For that leakage to occur, there would have to be a wind loading on the E&C Building which is physically impossible for an Easterly wind because the entire E&C Building is shielded by the primary plant structures. For a positive pressure to be exerted on the exterior control room pressure boundary, the wind must be from the North, South or West. Therefore, the only way for radioactivity to get into the

Control Room Envelope is if the exhaust from the primary plant vent stack is drawn through the CREFS fresh air intake. This air will be filtered and recirculated as designed. This path is not expected to introduce any significant amount of radioactivity given the elevation difference.

The above justification provided demonstrates that positive pressure is not necessary to prevent significant amounts of unfiltered inleakage into the Control Room Envelope from these design basis accidents. A breach in the boundary will not significantly affect the dose consequences to the operator.

Main Steam Line Break and Steam Generator Tube Rupture accidents

The thermal-hydraulic analyses associated with the Main Steam Line Break Accident and the Steam Generator Tube Rupture accident show that core damage is not expected to result from these events. Therefore, the only potential for Control Room Operator dose will result directly from the activity that exists in the primary and secondary coolant at the onset of the accident. Potential radiological release paths are from the atmospheric relief valves, the main steam and feedwater areas adjacent to the containment buildings and the Primary Plant Ventilation stack exhaust. These release points are essentially the same as for that for LOCA from containment. There would be no release via the Primary Plant Ventilation stack exhaust after the containment and Main Steam Isolation Valves are closed. Therefore, the discussion for LOCA release points above would also apply to these design basis accidents.

The main steam lines outside containment up to the main steam isolation valves are located above the E&C Building roof (El. 873'-4"). The Atmoshperic Relief Valve (ARV) stacks are located above elevation 896'-4".

The potential for these two accidents is only applicable to the operating unit. The activity in the primary and secondary coolant of both units is very small compared to those assumed in the Design Basis analyses. The ARV release, although not filtered, is emitted vertically by high energy steam. Any particles in this release will be carried high into the air and thus, taken away from the vicinity of the Control Room Ventilation intakes. Similarly, a main steam line break would tend to disperse radioactivity vertically. Similar to LOCA, it would be unlikely for both the radioactive plume from these accidents and a positive pressure due to wind loading on the E&C Building to exist at the same time.

This accident does not automatically trip Uncontrolled Access Area Ventilation off, thus this is a potential path for unfiltered air to enter the Cable Spreading room via the intake on the West side of the E&C Building. However, the control room would have notification of any steam line break or tube rupture accident well before significant radioactivity could be transported to the ventilation intakes and could secure Uncontrolled Access Area Ventilation as discussed for LOCA, above.

The above justification provided demonstrates that positive pressure is not necessary to prevent significant amounts of unfiltered inleakage into the Control Room Envelope from these design basis accidents. A breach in the boundary will not significantly affect the dose consequences to the operator.

Small Break Loss of Coolant Accident (3" CVCS Line Break Outside Containment)

The thermal-hydraulic analyses associated with this accident shows that core damage is not expected to result from this event. Therefore, the only potential for Control Room Operator dose will result directly from the activity that exists in the primary coolant at the onset of the accident. The potential radiological release path is from the Primary Plant Ventilation stack exhaust which is as described for LOCA, above, except the normal exhaust is filtered at a minimum efficiency of 90%.

The potential for this accident is only applicable to the operating unit. The activity in the primary coolant of both units is very small compared to those assumed in the Design Basis analyses.

This accident will not automatically align the HVAC systems for the buildings and rooms in the Auxiliary Building adjacent to the Control Room, however, the pressure in these buildings and rooms is normally negative relative to atmospheric pressure. A pressure transient would occur within the primary plant buildings until the event is terminated by operator isolation of letdown. The operator response time to identify and isolate this break would be less than 10 minutes based on the CPSES FSAR Section 3.6B.1.3. The absence of the 0.125 inch positive pressure between the control room and the primary plant would not significantly alter the consequences of this event.

The above justification provided demonstrates that positive pressure is not necessary to prevent significant amounts of unfiltered inleakage into the Control Room Envelope from this design basis accident. A breach in the boundary will not significantly affect the dose consequences to the operator.

Fuel Handling Accident

This accident can occur in either the Fuel Building or the Containment and will result in the radiological effluent being drawn into the particular building's HVAC exhaust. The exhaust from these two buildings eventually exhausts from the Plant Vent Stack. Therefore, the potential radiological release path is from the Primary Plant Ventilation stack exhaust which is normally filtered at a minimum efficiency of 90%. These release points are essentially the same as for that for LOCA from containment. This accident will not automatically align the HVAC systems for the buildings and rooms in the Auxiliary Building adjacent to the Control Room, however, the pressure in these buildings and rooms is normally negative relative to atmospheric pressure. The potential for this accident is only applicable during fuel handling operations.

This accident does not automatically trip Uncontrolled Access Area Ventilation off, thus this is a potential path for unfiltered air to enter the Cable Spreading room via the intake on the West side of the Electrical and Controls building. However, the control room would have notification of any fuel handling accident as well as alarms from the ventilation exhaust radiation monitors well before significant radioactivity could be transported to the ventilation intakes and could secure Uncontrolled Access Area Ventilation as discussed for LOCA, above.

The above justification provided demonstrates that positive pressure is not necessary to prevent significant amounts of unfiltered inleakage into the Control Room Envelope from these design basis accidents. A breach in the boundary will not significantly affect the dose consequences to the operator.

Gas Decay Tank Rupture and Radioactive Liquid Waste Tank Rupture Accidents

These accidents occur in their respective tank rooms in the Auxiliary and Safeguards Buildings. The result of these accidents will be localized contamination as well as airborne activity. The airborne radiological effluent will be drawn into the HVAC exhaust which eventually ends up in the Plant Vent Stack. These release points are essentially the same as for that for LOCA from containment. This accident will not automatically align the HVAC systems for the buildings and rooms in the Auxiliary Building adjacent to the Control Room, however, the pressure in these buildings and rooms is normally negative relative to atmospheric pressure. Therefore, the potential radiological release path is from the Primary Plant Ventilation stack exhaust which is filtered at a minimum efficiency of 90%. The control room would have notification of any tank rupture via alarms from the ventilation exhaust radiation monitors well before significant radioactivity could be transported to the ventilation intakes and could secure Uncontrolled Access Area Ventilation as discussed for LOCA, above. Furthermore, the gas decay tank is primarily noble gas which will float away when discharged from the stack rather than fall to the Control Room intake. The actual activity in these tanks is well below the activity assumed in the design basis accident.

The above justification provided demonstrates that positive pressure is not necessary to prevent significant amounts of unfiltered inleakage into the Control Room Envelope from these design basis accidents. A breach in the boundary will not significantly affect the dose consequences to the operator.

Summary of Accidents

It is shown in the paragraphs above that a breach in the boundary will not significantly affect the dose consequences to the operator. By applying simple compensatory measures and administrative controls, a breach in the Control Room that provides direct communication to the Cable Spreading Room will not affect the habitability of the Control Room. The only compensatory measures are to secure the Uncontrolled Access Area Ventilation supply and exhaust fans at the onset of an accident or if there is a threat of smoke or toxic gas from sources exterior to the plant. The administrative controls are to immediately begin sealing any breach in the boundary at the direction of the control room operator. The resulting seal must be sufficient to restore the ability of one CREFS train to pressurize the boundary to 0.125 inches water gauge at less than or equal to 800 cfm. This can be accomplished with methods as simple as draping heavy duty plastic over the affected area and applying duct tape to seal the boundary. Extension of the COMPLETION TIME for CONDITION B from 24 hours to 14 days for this specific case does not violate any GDC 19 criteria nor does it affect any radiological dose analysis.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

TXU Energy has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10CFR50.92, "Issuance of amendment," as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   This is a revision to the Technical Specifications for the control room emergency/filtration system which is a mitigation system designed to minimize in leakage and to filter the control room atmosphere to protect the operator following accidents previously analyzed. An important part of the system is the control room boundary. The control room boundary integrity is not an initiator or precursor to any accident previously evaluated. Therefore, the probability of any accident previously evaluated is not increased. The analysis of the consequences of analyzed accident scenarios under the control room breach conditions along with the compensatory actions for restoration of control room integrity demonstrate that the consequences of any accident previously evaluated are not increased. Therefore, it is concluded that this change does not significantly increase the probability of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed changes will not impact the accident analysis. The changes will not alter the requirements of the control room emergency/filtration system or its function during accident conditions. The administrative controls and compensatory actions will ensure the control room emergency/filtration system will perform its safety function. No new or different accidents result from performing the new actions and surveillance required. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions and current plant operating practice. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

   Response: No

   The proposed changes do not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by these changes. The proposed

changes will not result in plant operation in a configuration outside the design basis for an unacceptable period of time without compensatory actions and administrative controls. The proposed changes do not affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition. Therefore the proposed change does not involve a reduction in a margin of safety.

Based on the above evaluations, TXU Energy concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10CFR50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The proposed change to the CPSES Technical Specifications will ensure that the requirements contained in 10 CFR 50, Appendix A, GDC 19 are maintained. As described above in sections 3 and 4.

In conclusion, based on the considerations discussed above, (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 approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

TXU Energy has determined, by review of the above documentation, that the proposed change would not change a requirement with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would not change an inspection or surveillance requirement. TXU Energy has evaluated the proposed changes and has determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

7.0. REFERENCES

1. 10 CFR 50, Appendix A, General Design Criterion 19.

ATTACHMENT 2 to TXX-03096

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Pages 3.7-23 & 3.7-24

3.7.10 Control Room Emergency Filtration/Pressurization System (CREFS)

LCO 3.7.10 Two CREFS trains shall be OPERABLE

---NOTE---
The Control Room boundary may be opened intermittently under administrative controls.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CREFS train inoperable for reasons other than Condition B.	A.1	Restore CREFS train to OPERABLE status.	7 days
B. Two CREFS Trains inoperable due to inoperable Control Room boundary in MODES 1, 2, 3, and 4.	B.1	Restore control room boundary to OPERABLE status.	24 hours OR 14 days for a one time implementation for each unit of the Turbine Control Digital Modification to be completed during 2RF07 and 1RF10
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1 AND C.2	Be in MODE 3. Be in MODE 5.	6 hours 36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	D.1	Place OPERABLE CREFS train in emergency recirculation mode.	Immediately
	OR		
	D.2.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	D.2.2	Suspend movement of irradiated fuel assemblies.	Immediately
E. Two CREFS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies except for up to 14 days for a one time implementation for each unit of the Turbine Control Digital Modification to be completed during 2RF07 and 1RF10.	E.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	E.2	Suspend movement of irradiated fuel assemblies.	Immediately
F. Two CREFS trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition B.	F.1	Enter LCO 3.0.3.	Immediately

ATTACHMENT 3 to TXX-03096

PROPOSED TECHNICAL SPECIFICATION BASES CHANGES (MARK-UP)
(For Information Only)

Page B 3.7-58

BASES (continued)

APPLICABILITY

In MODES 1, 2, 3, 4, 5, 6, and during movement of irradiated fuel assemblies CREFS must be OPERABLE to control operator exposure during and following a DBA.

During movement of irradiated fuel assemblies the CREFS must be OPERABLE to cope with the release from a fuel handling accident.

ACTIONS

A.1

When one CREFS train is inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CREFS train is adequate to perform the control room protection function. However, the overall reliability is reduced because a single failure in the OPERABLE CREFS train could result in loss of CREFS function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and ability of the remaining train to provide the required capability.

B.1

If the control room boundary is inoperable in MODES 1, 2, 3, and 4 such that the CREFS trains can not establish or maintain the required pressure, action must be taken to restore an OPERABLE control room boundary within 24-hours. The 24 hour completion time is reasonable based on the low probability of a DBA occurring during this time period, and the availability of CREFs to provide a filtered environment (albiet with potential control room inleakage).

A temporary Completion Time is connected to the Completion Time requirements of 24 hours. The temporary Completion Time is 14 days and applies to the implementation of the Turbine Control Digital Modification for each unit during 2RF07 and 1RF10.

(continued)

ATTACHMENT 4 to TXX-03096

RETYPED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Pages 3.7-23 & 3.7-24

3.7.10 Control Room Emergency Filtration/Pressurization System (CREFS)

LCO 3.7.10 Two CREFS trains shall be OPERABLE

---NOTE---
The Control Room boundary may be opened intermittently under administrative controls.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CREFS train inoperable for reasons other than Condition B.	A.1	Restore CREFS train to OPERABLE status.	7 days
B. Two CREFS Trains inoperable due to inoperable Control Room boundary in MODES 1, 2, 3, and 4.	B.1	Restore control room boundary to OPERABLE status.	24 hours OR 14 days for a one time implementation for each unit of the Turbine Control Digital Modification to be completed during 2RF07 and 1RF10
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1	Be in MODE 3.	6 hours
	AND		
	C.2	Be in MODE 5.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	D.1	Place OPERABLE CREFS train in emergency recirculation mode.	Immediately
	OR		
	D.2.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	D.2.2	Suspend movement of irradiated fuel assemblies.	Immediately
E. Two CREFS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies except for up to 14 days for a one time implementation for each unit of the Turbine Control Digital Modification to be completed during 2RF07 and 1RF10.	E.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	E.2	Suspend movement of irradiated fuel assemblies.	Immediately
F. Two CREFS trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition B.	F.1	Enter LCO 3.0.3.	Immediately

ATTACHMENT 5 to TXX-03096

RETYPED TECHNICAL SPECIFICATION BASES CHANGES (MARK-UP)
(For Information Only)

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BASES (continued)

APPLICABILITY

In MODES 1, 2, 3, 4, 5, 6, and during movement of irradiated fuel assemblies CREFS must be OPERABLE to control operator exposure during and following a DBA.

During movement of irradiated fuel assemblies the CREFS must be OPERABLE to cope with the release from a fuel handling accident.

ACTIONS

A.1

When one CREFS train is inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CREFS train is adequate to perform the control room protection function. However, the overall reliability is reduced because a single failure in the OPERABLE CREFS train could result in loss of CREFS function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and ability of the remaining train to provide the required capability.

B.1

If the control room boundary is inoperable in MODES 1, 2, 3, and 4 such that the CREFS trains can not establish or maintain the required pressure, action must be taken to restore an OPERABLE control room boundary within 24-hours. The 24 hour completion time is reasonable based on the low probability of a DBA occurring during this time period, and the availability of CREFs to provide a filtered environment (albiet with potential control room inleakage).

A temporary Completion Time is connected to the Completion Time requirements of 24 hours. The temporary Completion Time is 14 days and applies to the implementation of the Turbine Control Digital Modification for each unit during 2RF07 and 1RF10.

(continued)