

TXU Energy
Comanche Peak Steam
Electric Station
P.O. Box 1002 (E01)
Glen Rose, TX 76043
Tel: 254 897 5209
Fax: 254 897 6652
mike.blevins@txu.com

Mike Blevins
Senior Vice President & Principal Nuclear Officer

Ref: 10CFR50.90

CPSES-200302700
Log # TXX-03192
File # 00236

December 18, 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) 03-09
CORRECTION TO COMPLETION TIMES FOR TECHNICAL SPECIFICATION
(TS) 3.9.6, RESIDUAL HEAT REMOVAL (RHR) AND COOLANT
CIRCULATION LOW WATER LEVEL

- REF: 1) TXU Energy Letter logged TXX-02201 dated December 4, 2002 from C. Lance Terry to the NRC
- 2) NRC Letter dated June 24, 2003 from Jack Donohew to C. Lance Terry
- 3) NRC Letter dated August 13, 2003 from Jack Donohew to C. Lance Terry

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 change for each unit will revise TS 3.9.6 entitled "Residual Heat Removal (RHR) and Coolant Circulation Low Water Level" to correct the completion times for ACTION B.2 and B.3. ACTION B.2 should have a completion time of "Immediately" and ACTION B.3 should have a completion time of "4 hours".

Reference 1 was a requested revision to technical specifications regarding suspension of positive reactivity additions. The completion times for ACTION B.2 and B.3 of TS 3.9.6 were incorrect due to an editorial error which was made when formatting the revised page. This error went undetected thru review and approval of Amendment 105 to the CPSES Technical Specifications by the NRC per references 2 and 3.

DDZ9

TXX-03192
Page 2 of 3

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 page marked-up to reflect the proposed changes. Attachment 3 provides the retyped Technical Specification page which incorporate the requested changes.

TXU Energy requests approval of the proposed License Amendment by March 26, 2004 to be implemented within 30 days of the issuance of the license amendment. The approval date was selected to support implementation during 1RF10, which 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.

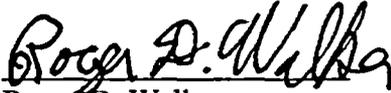
Executed on December 18, 2003.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

M. R. Blevins
Senior Vice President and Principal Nuclear Officer

By: 
Roger D. Walker
Regulatory Affairs Manager

JCH/jch

TXX-03192
Page 3 of 3

Attachments 1. Description and Assessment
2. Markup of Technical Specification Page
3. Retyped Technical Specification Page

c - B. S. Mallett, Region IV
W. D. Johnson, Region IV
M. C. Thadani, NRR
Resident Inspectors, CPSES

Ms. Alice Rogers
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78756-3189

ATTACHMENT 1 to TXX-03096
DESCRIPTION AND ASSESSMENT

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 change for each unit into the CPSES Unit 1 and 2 Technical Specifications (TS). Proposed change License Amendment Request (LAR) 03-09 is a request to revise Technical Specification (TS) 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation Low Water Level" for Comanche Peak Steam Electric Station (CPSES) Units 1 and 2.

This is a correction of an editorial error which was made when formatting the revised technical specification page in TXU Energy's previous LAR. This error went undetected during TXU Energy's review of the LAR and the NRC review and approval of Amendment 105 to the CPSES Technical Specifications.

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 Times for ACTION B.2 and B.3 of TS 3.9.6.

Specifically, this change corrects the Completion Time for Action B.2 to "Immediately" and adds the Completion Time for Action B.3 to be "4 hours".

3.0 TECHNICAL ANALYSIS

The proposed change will return the Completion Times for Actions B.2 and B.3 of TS 3.9.6 to the previous correct values prior to the implementation of Amendment 105 to the Technical Specifications on August 21, 2003.

TS 3.9.6 is only applicable when the plant is in MODE 6 with the water level <23 ft above the top of the reactor vessel flange. Unit 2 entered its seventh refueling outage (2RF07) on October 4, 2003. ACTION B is the condition when "No RHR loop is in operation." There was never a time period during 2RF07 when RHR loops were inoperable in MODE 6 with the water <23 ft above the top of the reactor vessel flange. In addition, a tracking LCOAR (Limiting Condition for Operation Action Requirement) has been initiated which will ensure that the correct completion times will be used if TS 3.9.6 is entered prior to implementation of this LAR.

4.0 SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

The proposed change is considered to be a correction of an editorial error. The proposed revision to TS 3.9.6 is consistent with the current CPSES licensing basis. Therefore the proposed change does not involve a significant increase in the probability or consequences 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 change is considered to be an editorial correction and 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 change is considered to be an editorial correction and does not involve a reduction in a margin of safety.

Based on the above evaluations, TXU Energy has determined that the requested Technical Specification changes do not involve a significant increase in the probability or consequences of an accident or other adverse condition. It does not create the possibility of a new or different kind of accident or condition previously evaluated. It does not involve a reduction in the margin of safety. Therefore, the requested license amendment request does not involve a significant hazards consideration.

5.0 ENVIRONMENTAL CONSIDERATION

TXU Energy has evaluated the proposed change and has determined that the change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amount of effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22 (c)(9). Therefore, pursuant to 10CFR51.22 (b), an environmental assessment of the proposed change is not required.

6.0 REFERENCES

None.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. No RHR loop in operation.	B.1 Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the boron concentration of LCO 3.9.1.	Immediately
	<u>AND</u>	
	B.2 Initiate action to restore one RHR loop to operation.	4 hours Immediately
	<u>AND</u>	
	B.3 Close all containment penetrations providing direct access from containment atmosphere to outside atmosphere.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.6.1 Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 1000 gpm.	12 hours
SR 3.9.6.2 Verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation.	7 days

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. No RHR loop in operation.	B.1 Suspend operations that would cause introduction of coolant into the RCS with boron concentration less than required to meet the boron concentration of LCO 3.9.1.	Immediately
	<u>AND</u>	
	B.2 Initiate action to restore one RHR loop to operation.	Immediately
	<u>AND</u>	
	B.3 Close all containment penetrations providing direct access from containment atmosphere to outside atmosphere.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.6.1 Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 1000 gpm.	12 hours
SR 3.9.6.2 Verify correct breaker alignment and indicated power available to the required RHR pump that is not in operation.	7 days