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Ref: 10 CFR 50.90

CPSES-200402072  
Log # TXX-04162  
File # 00236

September 10, 2004

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  
SUBMITTAL OF LICENSE AMENDMENT REQUEST 04-06  
APPLICATION FOR TECHNICAL SPECIFICATION  
IMPROVEMENT TO ELIMINATE REQUIREMENT TO PROVIDE  
MONTHLY OPERATING REPORTS AND ANNUAL  
OCCUPATIONAL RADIATION EXPOSURE REPORTS USING THE  
CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), TXU Power is submitting a request for an amendment to the Technical Specifications (TS) 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 request applies equally to both units.

The proposed amendment would delete the TS requirements to submit monthly operating reports and annual occupational radiation exposure reports. The change is consistent with Revision 1 to NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369,

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“Removal of Monthly Operating Report and Occupational Radiation Exposure Report.” The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the Consolidated Line Item Improvement Process (CLIIP).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant specific verifications. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides the retyped technical specification pages.

TXU Power requests approval of the proposed License Amendment by March 31, 2005, with the amendment being implemented within sixty days from approval. The approval date was administratively selected to allow for NRC review, but CPSES does not require this amendment to allow continued safe full power operation.

In accordance with 10CFR50.91(b), a copy of this amendment request, with attachments, is being provided to the designated Texas State Official.

This communication contains the following new commitment that will be completed as noted:

**Commitment #27137**

TXU Power is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 “Revised Contents of the Monthly Operating Report,” by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry’s Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).

This application is being made in accordance with the CLIIP. TXU Power is not proposing variations or deviations from the NRC staff’s model SE published on June 23, 2004 (69 FR 35067)

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If you have any questions regarding this submittal, please contact Douglas W. Snow at (254) 897-8448.

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

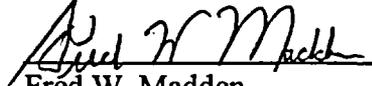
Executed on 09/10/2004

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,  
Its General Partner

Mike Blevins

By:   
Fred W. Madden  
Director, Regulatory Affairs

dws

Attachment: 1 Evaluation  
2 Markup of Technical Specification pages  
3 Retyped Technical Specification pages

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 49<sup>th</sup> Street  
Austin, Texas 78756-3189

**ATTACHMENT 1 to TXX-04162**  
**DESCRIPTION AND ASSESSMENT**

## **LICENSEE'S EVALUATION**

1. DESCRIPTION
2. PROPOSED CHANGE
3. BACKGROUND
4. TECHNICAL ANALYSIS
5. REGULATORY SAFETY ANALYSIS
  - 5.1. No Significant Hazards Consideration
  - 5.2. Applicable Regulatory Requirements/criteria
6. ENVIRONMENTAL CONSIDERATION
7. REFERENCES

## EVALUATION

### 1.0 DESCRIPTION

The proposed License Amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1 (Reference 7.1). The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) (Reference 7.2), as part of the Consolidated Line Item Improvement Process (CLIIP).

### 2.0 PROPOSED CHANGE

Consistent with the NRC approved Revision 1 of TSTF-369, the proposed change would delete the TS requirements to submit monthly operating reports and annual occupational radiation exposure reports. Requirements TS 5.6.1 "Occupational Radiation Exposure Report" and TS 5.6.4 "Monthly Operating Report" would be deleted.

### 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### 4.0 TECHNICAL ANALYSIS

TXU Power has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the information provided to support TSTF-369. TXU Power has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to CPSES Units 1 & 2 and justify this amendment for the incorporation of the changes to the CPSES Units 1 & 2 TS.

### 5.0 REGULATORY SAFETY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **5.1 No Significant Hazards Consideration**

TXU Power has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. TXU Power has concluded that the proposed determination presented in the notice is applicable to CPSES Unit 1 & 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

### **5.2 Regulatory Requirements and Guidance**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

### **5.3 Verification and Commitments**

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, TXU Power is making the following regulatory commitment:

1. TXU Power is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).
2. CPSES does not have different reactor types or both operating and shutdown reactors.

## **6.0 ENVIRONMENTAL CONSIDERATION**

TXU Power has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. TXU Power has concluded that the staff's findings presented in that evaluation are applicable to CPSES and the evaluation is hereby incorporated by reference for this application.

## **7.0 REFERENCES**

- 7.1 Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1.
- 7.2 Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067)

**ATTACHMENT 2 To TXX-04162**

**PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)**

**Page 5.0-29**

**5.0-31**

## 5.0 ADMINISTRATIVE CONTROLS

### 5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

#### 5.6.1 Deleted Occupational Radiation Exposure Report

~~NOTE~~

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

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.~~

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5.6 Reporting Requirements (continued)

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5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

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The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Deleted Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience, shall be submitted on a monthly basis no later than the 20th of each month following the calendar month covered by the report.~~

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**ATTACHMENT 3 To TXX-04162**  
**RETYPE TECHNICAL SPECIFICATION PAGES**

**Page 5.0-29**  
**5.0-31**

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 DELETED

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(continued)

5.6 Reporting Requirements (continued)

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5.6.3 Radioactive Effluent Release Report

-----NOTE-----

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

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The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 DELETED

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(continued)