

From: <dbuschb1@txu.com>
To: <mct@nrc.gov>
Date: 3/2/04 8:13AM
Subject: DRAFT request for extension of Amendment 109

This is what we thought we would submit. It would be cleaned up a bit and the specific outage dates and duration would be made more general.

How's that look?

Denny

----- Forwarded by Dennis Buschbaum/ENERGY/TXU on 03/02/2004 07:11 AM -----

Connie Wilkerson
To: Dennis Buschbaum/ENERGY/TXU@TXUE
03/01/2004 10:58 AM cc: Timothy Hope/ENERGY/TXU@TXUE, Fred
Madden/ENERGY/TXU@TXUE
AM Subject:

Here is a copy of the DRAFT letter I had prepared last week asking for an extension of date for License Amendment No. 109.

This will need to be revised accordingly by management for the right tone/justification, etc.

(See attached file: T04xxxclw.wpd).

Docket #1
50-445-
50-446

Mail Envelope Properties (40448880.EA1 : 1 : 7841)

Subject: DRAFT request for extension of Amendment 109
Creation Date: 3/2/04 8:08AM
From: <dbuschb1@txu.com>

Created By: dbuschb1@txu.com

Recipients

nrc.gov
owf4_po.OWFN_DO
MCT (Mohan Thadani)

Post Office
owf4_po.OWFN_DO

Route
nrc.gov

Files	Size	Date & Time
MESSAGE	1457	03/02/04 08:08AM
T04xxxclw.wpd	35756	
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Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

CPSES-2004xxxxx
Log # TXX-04xxx

March 1, 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
IMPLEMENTATION OF LICENSE AMENDMENT NO. 109,
INCREASING FLEXIBILITY IN MODE RESTRAINTS**

- REF: 1. NRC letter from Mohan C. Thadani to M. R. Blevins "CPSES Units 1 and 2 - Issuance Of Amendments RE: Increasing Flexibility In Mode Restraints" (TAC NOS. MC0007 AND MC0008), dated January 23, 2004.
2. TXU Energy letter logged TXX-03116 from C. L. Terry to NRC "License Amendment Request (LAR) 03-06- Revisions To Technical Specifications Regarding MODE Change Limitations Using the Consolidated Line Item Improvement Process" dated July 21, 2003

Gentlemen:

The purpose of this letter is to request an extension to the date that is currently specified for implementing CPSES License Amendment No. 109 (Reference 1).

TXU Generation Company LP (TXU Energy) submitted License Amendment Request (LAR) 03-06 (Reference 2) which requested an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) based on Industry/Technical Specification Task Force (TSTF) Traveler number TSTF-359 "Increase Flexibility in Mode Restraints." In the cover letter of the LAR, TXU Energy had requested that the amendment be issued by January, 2004 and implemented within 60 days of issuance.

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

License Amendment No. 109 was issued by the NRC on January 23, 2004 and is currently required to be implemented by March 23, 2004. However, after receipt of the amendment, TXU Energy has determined that full implementation of the amendment's provisions in revised Station procedures, processes and related licensing basis documents may not be readily achievable or prudent to implement by the specified implementation date.

The reasons for requesting an implementation date extension are as follows:

1. TXU Energy is currently involved in final preparations for starting CPSES Unit 1 Refueling Outage 1RFO10 which is scheduled to begin March 27, 2004. The available personnel resources needed to complete the relatively large number of procedure/process revisions and training required to implement Amendment No. 109 are already heavily committed to outage preparation work.
2. The procedures and processes that are required to be revised and implemented for Amendment No. 109 involve Operations procedures for controlling MODE changes during Outages and Station procedures, processes and tools used for assessing risks based on the availability of systems/equipment and plant conditions. TXU Energy prefers not to implement such a major change in these types of procedures/processes so close to the beginning of a Unit Refueling Outage.
3. 1RFO10 involves a greater scope of work than usual and is scheduled for a 36 day duration.

Accordingly, TXU Energy respectfully requests that the required date for implementing License Amendment No. 109 be extended to June 30, 2004.

If you have any questions, please contact Mr. Denny Buschbaum at (254) 897-xxxx.

TXX-04005
Page 3 of 2

Sincerely,

TXU Generation Company LP
By: TXU Generation Management Company LLC,
Its General Partner

Mike Blevins
Senior Vice President and Principal Nuclear Officer

By: _____
Fred W. Madden
Nuclear Licensing Manager

CLW/clw

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

Received: from igate.nrc.gov
 by nrcgwia.nrc.gov; Tue, 02 Mar 2004 08:13:33 -0500
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 by smtp-gateway ESMTPœ id i22DD3cc022456
 for <mct@nrc.gov>; Tue, 2 Mar 2004 08:13:04 -0500 (EST)
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