



**TXU Power**  
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**Mike Blevins**  
Senior Vice President  
& Chief Nuclear Officer

Ref: 10CFR50.90

CPSES-200401311  
Log # TXX-04038  
File # 00236

September 30, 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  
LICENSE AMENDMENT REQUEST (LAR) 04-01  
REVISION TO TECHNICAL SPECIFICATION (TS) 5.5.7  
EXTENSION OF THE REACTOR COOLANT PUMP FLYWHEEL  
INSPECTION INTERVAL**

Gentlemen:

Pursuant to 10CFR50.90, TXU Generation Company LP (TXU Power) 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 will revise TS 5.5.7 to extend the Reactor Coolant Pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval to an interval not to exceed 20 years. The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this Technical Specification (TS) improvement was announced in the Federal Register on October 22, 2003 as part of the Consolidated Line Item Improvement Process (CLIP).

Attachment 1 provides a description of the proposed change and the requested confirmation of applicability. Attachment 2 provides the affected Technical Specification pages marked-up to reflect the proposed change. Attachment 3 provides retyped Technical Specification pages which incorporate the requested change.

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TXX-04038

Page 2 of 3

TXU Power requests approval of the proposed License Amendment by January 1, 2005 to be implemented within 60 days of the issuance of the license amendment.

This approval date was administratively selected to allow for NRC review but the plant does not require this amendment to allow continued safe full power operations.

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

This communication contains no new or revised commitments.

Should you have any questions, please contact Mr. Gary Merka at (254) 897-6613.

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

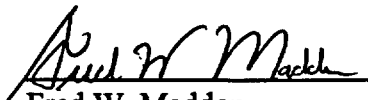
Executed on September 30, 2004

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC  
Its General Partner

Mike Blevins

By:   
Fred W. Madden  
Director, Regulatory Affairs

GLM/glm

Attachments 

1. Description and Assessment
2. Markup of Technical Specifications pages
3. Retyped Technical Specification Pages

**TXX-04038**

**Page 3 of 3**

**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-04038**  
**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

## **1.0 DESCRIPTION**

By this letter, TXU Power 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. Proposed change LAR 04-01 is a request to revise Technical Specifications (TS) 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program" for Comanche Peak Steam Electric Station (CPSES) Units 1 and 2. This proposed change will extend the Reactor Coolant Pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval to an interval not to exceed 20 years.

The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program," WCAP-15666 (Reference 7.3). The availability of this Technical Specification (TS) improvement was announced in the Federal Register on October 22, 2003 (Reference 7.1) as part of the Consolidated Line Item Improvement Process (CLIIP).

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

## **2.0 PROPOSED CHANGE**

The proposed change would revise TS 5.5.7 to extend the Reactor Coolant Pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval to an interval not to exceed 20 years.

## **3.0 BACKGROUND**

The background for this application is adequately addressed by the NRC Notice of Availability published on October 22, 2003 in 68 FR 60422 (Reference 7.1), NRC Notice for Comment published June 24, 2003 in 68 FR 37590 (Reference 7.2), TSTF-421 (Reference 7.3), WCAP-15666-A, "Extension of Reactor Coolant Pump Motor Flywheel Examination" (Reference 7.4), and the related NRC safety evaluation (SE) dated May 5, 2003 (Reference 7.5).

## **4.0 TECHNICAL ANALYSIS**

TXU Power has reviewed the model SE published on June 24, 2003 in 68 FR 37590 (Reference 7.2), and verified its applicability as part of the CLIIP. This verification included a review of the NRC staff's model SE, as well as the information provided to support TSTF-421 (Reference 7.3) including WCAP-15666 and the related SE dated May 5, 2003 (Reference 7.5). TXU Power has concluded that the justifications presented in the

TSTF proposal and the model SE prepared by the NRC staff are applicable to CPSES and justify this amendment for the incorporation of the changes to the CPSES TS.

## **5.0 REGULATORY SAFETY ANALYSIS**

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

TXU Power has reviewed the proposed no significant hazards consideration determination published on June 24, 2003 in 68 FR 37590 (Reference 7.2) as part of the CLIIP. TXU Power has concluded that the proposed determination presented in the notice is applicable to CPSES and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

### **5.2 Applicable Regulatory Requirements/Criteria**

A description of this proposed change and its applicable regulatory requirements and guidance was provided in the NRC notices related to the CLIIP, TSTF-421 (Reference 7.3), topical report WCAP-15666-A (Reference 7.4), and the associated NRC SE (Reference 7.5).

## **6.0 ENVIRONMENTAL CONSIDERATION**

TXU Power has reviewed the environmental evaluation included in the model SE published on June 24, 2003 in 68 FR 37590 (Reference 7.2) 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 Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published October 22, 2003 (68 FR 60422).
- 7.2 Federal Register Notice: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published June 24, 2003 (68 FR 37590).

- 7.3 Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)," Revision 0, November 2001.
- 7.4 WCAP-15666-A, "Extension of Reactor Coolant Pump Motor Flywheel Examination," Revision 1, October 2003.
- 7.5 NRC letter dated May 5, 2003, from H. Berkow to R. Bryan (WOG), "Safety Evaluation of Topical Report WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination" (TAC NO. MB2819)."



**ATTACHMENT 2 to TXX-04038**

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

**Page 5.0-11**

**5.5 Programs and Manuals (continued)**

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**5.5.5 Component Cyclic or Transient Limit**

This program provides controls to track the FSAR, Section 3.9N, cyclic and transient occurrences to ensure that components are maintained within the design limits.

**5.5.6 Not used**

**5.5.7 Reactor Coolant Pump Flywheel Inspection Program**

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at approximately 10 20 year intervals. ~~coinciding with Inservice Inspection schedule as required by ASME Section XI.~~

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**ATTACHMENT 3 to TXX-04038**  
**RETYPE TECHNICAL SPECIFICATION PAGES**  
**Page 5.0-11**

5.5 Programs and Manuals (continued)

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5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the FSAR, Section 3.9N, cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Not used

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at 20 year intervals.

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