



TXU Power
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 &
Chief Nuclear Officer

Ref: 10CFR50.90

CPSES-200402744
Log # TXX-04217

December 3, 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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION TO
LICENSE AMENDMENT REQUEST (LAR) 03-008: COMMON
STARS LICENSE AMENDMENT, IMPLEMENTATION OF WCAP-
14333 AND WCAP-15376 RTS AND ESFAS TEST TIMES,
COMPLETION TIMES, AND SURVEILLANCE TEST INTERVALS
(TAC NO. MB1845/1846)**

**REF: 1) TXU Electric Letter logged TXX-03187 from Mike Blevins to
the NRC dated January 21, 2004**

Gentlemen:

In reference 1 above, TXU Generation Company LP (TXU Power) transmitted an application for amendment to Facility Operating License Number NPF-87 and NPF-89 for CPSES Unit 1 and Unit 2. The proposed amendment would revise Technical Specification (TS) 3.3.1 entitled "Reactor Trip System (RTS) Instrumentation," TS 3.3.2 entitled "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," and TS 3.3.6 entitled "Containment Ventilation Isolation Instrumentation" to adopt Completion Time, test bypass time, and Surveillance Frequency changes approved by NRC in WCAP-14333-P-A, Revision 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times," October 1998 and WCAP-15376-P-A, Revision 1, "Risk-Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," March 2003. As discussed in reference 1

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

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

A001

TXX-04217

Page 2 of 3

above, the requested changes were based on the following NRC-approved travelers: Industry/Technical Specification Task Force (TSTF) Standard TS (STS) Change Traveler 411, Revision 1, "Surveillance Test Interval Extensions for Components of the Reactor Protection System (WCAP-15376)"; and Industry/TSTF STS Change Traveler 418, Revision 2, "RPS and ESFAS Test Times and Completion Times (WCAP-14333)."

Reference 1 proposed to restructure TS 3.3.1 Condition D from what was approved in TSTF -418, Revision 2, to avoid confusion as to when a flux map for determining the Quadrant Power Tilt Ratio (QPTR) is required. Discussions with the NRC Project Manager and NRC Technical Specification Section personnel on July 13, 2004 and July 29, 2004 identified potential format concerns with the originally proposed Condition D. After further review, it was determined that the originally proposed Condition D should be revised. The proposed revision was again discussed with the NRC staff on September 1, 2004.

Attachment 1 contains the proposed revision to TS 3.3.1 Condition D and replaces the mark-ups to TS page 3.3-3 included in Attachment 2 of Reference 1. Attachment 2 of this letter contains the revised TS Bases for Condition D (for information only).

Attachment 3 contains the retyped TS pages and Attachment 4 contains the retyped TS Bases pages incorporating these proposed changes. This supplemental information does not impact the conclusions of the No Significant Hazards Consideration or the Environmental Consideration provided in Reference 1. This proposed revision to TS 3.3.1 Condition D was reviewed by the Station Operations Review Committee. In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Texas State official.

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

Should you have any questions, please contact Robert A. Slough at (254) 897-5727.

TXX-04217

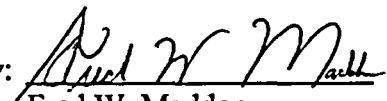
Page 3 of 3

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

RAS/

Attachment 1, Proposed Technical Specification Changes (markup)

Attachment 2, Proposed Technical Specification 3.3.1 Bases Changes (for
information only)

Attachment 3, Retyped Technical Specification Pages

Attachment 4, Retyped Technical Specification Bases Pages

c - B. S. Mallett, Region IV
W. D. Johnson, Region IV
M. C. Thadani, NRR
Jack N. Donohew, 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-04217

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Insert 1 for page 3.3-3

INSERT 1 (for page 3.3-3)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One Power Range Neutron Flux - High channel inoperable.	<p>-----NOTE----- The inoperable channel or another channel may be bypassed for up to 12 hours for surveillance testing and setpoint adjustment of other channels. -----</p>	
	<p>D.1.1 -----NOTE----- Only required to be performed when the Power Range Neutron Flux input to QPTR is inoperable with THERMAL POWER > 75% RTP. -----</p>	
	Perform SR 3.2.4.2.	12 hours from discovery of THERMAL POWER > 75% RTP
	<u>AND</u>	AND
	Once per 12 hours thereafter	
	D.1.2 Place channel in trip.	72 hours
	<u>OR</u>	
	D.2 Be in MODE 3.	78 hours

ATTACHMENT 2 to TXX-04217

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

Insert 2

INSERT 2

With one of the NIS power range detectors inoperable, 1/4 of the radial power distribution monitoring capability is lost. Therefore, SR 3.2.4.2 must be performed (Required Action D.1.1) within 12 hours of THERMAL POWER exceeding 75% RTP and once per 12 hours thereafter. If reactor power decreases to \leq 75% RTP, the measurement of both Completion Times for Required Action D.1.1 stops and SR 3.2.4.2 is no longer required. Completion Time tracking recommences upon reactor power exceeding 75% RTP. Calculating QPTR every 12 hours compensates for the lost monitoring capability due to the inoperable NIS power range channel and allows continued plant operation at power levels $>$ 75% RTP. At power levels \leq 75% RTP, operation of the core with radial power distributions beyond the design limits, at a power level where DNB conditions may exist, is prevented. The 12 hour Completion Time is consistent with the SR 3.2.4.2 Frequency in LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

Required Action D.1.1 has been modified by a Note which only requires SR 3.2.4.2 to be performed if the Power Range Neutron Flux input to QPTR becomes inoperable. Failure of a component in the Power Range Neutron Flux Channel which renders the High Flux Trip Function inoperable may not affect the capability to monitor QPTR. As such, determining QPTR using the movable incore detectors once per 12 hours may not be necessary.

ATTACHMENT 3 to TXX-04217
RETYPE TECHNICAL SPECIFICATION PAGES
Page 3.3-3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One Power Range Neutron Flux - High channel inoperable.	<p>-----NOTE----- The inoperable channel or another channel may be bypassed for up to 12 hours for surveillance testing and setpoint adjustment of other channels. -----</p> <p>D.1.1 -----NOTE----- Only required to be performed when the Power Range Neutron Flux input to QPTR is inoperable. -----</p> <p>Perform SR 3.2.4.2.</p>	<p>12 hours from discovery of THERMAL POWER > 75% RTP</p> <p>AND</p> <p>Once per 12 hours thereafter</p>
	<p><u>AND</u></p> <p>D.1.2 Place channel in trip.</p>	
	<p><u>OR</u></p> <p>D.2 Be in MODE 3</p>	
		72 hours
		78 hours

(continued)

ATTACHMENT 4 to TXX-04217

**RETYPE TECHNICAL SPECIFICATION BASES PAGES
(For Information Only)**

**Pages B 3.3-40
B 3.3-41**

BASES

ACTIONS
(continued)

C.1, C.2.1 and C.2.2 (continued)

This action addresses the train orientation of the SSPS for these Functions. With one channel or train inoperable, the inoperable channel or train must be restored to OPERABLE status within 48 hours. If the affected Function(s) cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be placed in a MODE in which the requirement does not apply. To achieve this status, action must be initiated within the same 48 hours to fully insert all rods and the Rod Control System be rendered incapable of rod withdrawal within the next hour (e.g., by de-energizing all CRDMs, by opening the RTBs, or de-energizing the motor generator (MG) sets). The additional hour provides sufficient time to accomplish the action in an orderly manner. In this condition, these Functions are no longer required.

The Completion Time is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function, and given the low probability of an event occurring during this interval.

Condition C is modified by a Note stating that while the LCO is not met in MODE 5 making the Rod Control System capable of rod withdrawal is not permitted for Functions 19, 20, or 21. This Note specifies an exception to LCO 3.0.4 and avoids placing the plant in a condition where control rods can be withdrawn while the reactor trip system is degraded.

D.1.1, D.1.2, and D.2

Condition D applies to the Power Range Neutron Flux—High Function.

With one of the NIS power range detectors inoperable, 1/4 of the radial power distribution monitoring capability is lost. Therefore, SR 3.2.4.2 must be performed (Required Action D.1.1) within 12 hours of THERMAL POWER exceeding 75% RTP and once per 12 hours thereafter. If reactor power decreases to $\leq 75\%$ RTP, the measurement of both Completion Times for Required Action D.1.1 stops and SR 3.2.4.2 is no longer required. Completion Time tracking recommences upon reactor power exceeding 75% RTP. Calculating QPTR every 12 hours compensates for the lost monitoring capability

(continued)

BASES

ACTIONS
(continued)

D.1.1, D.1.2, and D.2 (continued)

due to the inoperable NIS power range channel and allows continued plant operation at power levels $> 75\%$ RTP. At power levels $\leq 75\%$ RTP, operation of the core with radial power distributions beyond the design limits, at a power level where DNB conditions may exist, is prevented. The 12 hour Completion Time is consistent with the SR 3.2.4.2 Frequency in LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

Required Action D.1.1 has been modified by a Note which only requires SR 3.2.4.2 to be performed if the Power Range Neutron Flux input to QPTR becomes inoperable. Failure of a component in the Power Range Neutron Flux Channel which renders the High Flux Trip Function inoperable may not affect the capability to monitor QPTR. As such, determining QPTR using the movable incore detectors once per 12 hours may not be necessary.

The NIS power range detectors provide input to the CRD System and, therefore, have a two-out-of-four trip logic. A known inoperable channel must be placed in the tripped condition. This results in a partial trip condition requiring only one-out-of-three logic for actuation. The 72 hours allowed to place the inoperable channel in the tripped condition is justified in WCAP-14333-P-A (Ref. 11).

As an alternative to the above Actions, the plant must be placed in a MODE where this Function is no longer required OPERABLE. Seventy-eight (78) hours are allowed to place the plant in MODE 3. The 78-hour Completion Time includes 72 hours for channel corrective maintenance, and an additional 6 hours for the MODE reduction as required by Required Action D.2. This is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. If Required Actions cannot be completed within their allowed Completion Times, LCO 3.0.3 must be entered.

The Required Actions have been modified by a Note that allows placing the inoperable channel or another channel in the bypass condition for up to 12 hours while performing routine surveillance testing. The Note also allows placing the inoperable channel in the bypass condition to allow setpoint adjustments of other channels when required to reduce the setpoint in accordance with other Technical Specifications. The 12 hour time limit is justified in Reference 11.

(continued)