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Mike Blevins
Senior Vice President &
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Ref: 10CFR50.90

CPSES-200501824
Log # TXX-05164
File # 00236

September 6, 2005

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
COMMENTS ON SAFETY EVALUATION FOR LICENSE AMENDMENT 120, CHANGE TO TECHNICAL SPECIFICATION (TS) 3.7.10, ONE-TIME EXTENSION OF CONTROL ROOM BOUNDARY OPERABILITY FROM 24 HOURS TO 14 DAYS
(TAC NOS. MC6637 AND MC6638)

REF: 1) TXU Power Letter, logged TXX-04102, from Mike Blevins to U. S. Nuclear Regulatory Commission dated August 5, 2004.
2) TXU Power Letter, logged TXX-05032, from Mike Blevins to U. S. Nuclear Regulatory Commission dated March 15, 2005.
3) TXU Power Letter, logged TXX-05104, from Mike Blevins to U. S. Nuclear Regulatory Commission dated May 18, 2005.
4) NRC Letter, from Mohan C. Thadani to Mike Blevins dated August 11, 2005.

Gentlemen:

Pursuant to 10CFR50.90, TXU Generation Company LP (TXU Power) requested an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) via References 1, 2 and 3. In response to References 1, 2, and 3, the NRC has issued Amendment No. 120 to Facility Operating License No. NPF-87 and Amendment No. 120 to Facility Operating License No. NPF-89 for CPSES, Units 1 and 2, respectively (Reference 4). The Amendments revised the TS 3.7.10, "Control Room Emergency Filtration/Pressurization System (CREFS)."

In Reference 4 the NRC enclosed the related Safety Evaluation. TXU Power has reviewed the Safety Evaluation enclosed with Reference 4 and is providing comments / clarifications in the Attachment to this letter. TXU Power is requesting that the Safety Evaluation enclosed with Reference 4 be updated to incorporate comments 1 and 2 in the Attachment. License Amendment 120 is currently scheduled to be implemented on September 22, 2005.

D029

The revised Technical Specification pages as issued by Reference 4 are correct.

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

This communication contains no new commitments.

Should you have any questions, please contact Mr. Carl Corbin at (254) 897-0121 or e-mail at ccorbin1@txu.com.

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

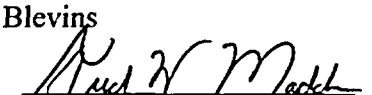
Executed on September 6, 2005.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

CBC/cbc

Attachment

c - B. S. Mallett, 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

TXU Power Comments on NRC Safety Evaluation Related to
Amendment No. 120 to Facility Operating License No. NPF-87 and
Amendment No. 120 to Facility Operating License No. NPF-89

TXU Power has reviewed the NRC Safety Evaluation for License Amendment No. 120 for Comanche Peak Steam Electric Station Units 1 and 2 and provides the following comments.

Comment 1

TXU Power Letter TXX-05032 identified commitment number 27321 which stated in part "administrative controls to provide a designated, readily available individual(s) who can be readily contacted by the Control Room (e.g., audible range or via radio, plant gaitronics system)". The NRC Safety Evaluation discussed this commitment in three different places:

(a) NRC Safety Evaluation, page 3, 1st paragraph, 4th line, states "administrative controls to provide a designated, readily available individual(s) who can be readily contacted by the Control Room (e.g., audible range or via radio, plant gaitronics system)

(b) NRC Safety Evaluation, page 7, 1st paragraph, 8th line, states "The dedicated individual, who is in the control room at all times when the pressure boundary is inoperable...," and

(c) NRC Safety Evaluation, page 9, 2nd paragraph, 2nd line, states "administrative controls to provide a designated, readily available onsite seal certified individual(s), who can be readily contacted by the control room (e.g., audible range or via radio, plant gaitronics system)".

Items (a) and (c) either use the same or essentially the same wording as the TXU Power License Amendment Request. The wording of item (b) is more restrictive and should be updated to be consistent with items (a) and (c).

TXU Power Comments on NRC Safety Evaluation Related to
Amendment No. 120 to Facility Operating License No. NPF-87 and
Amendment No. 120 to Facility Operating License No. NPF-89

Comment 2

In the NRC Safety Evaluation, Section 3.0, "Technical Evaluation," page 6, fourth paragraph, the Safety Evaluation states the changes are acceptable; because

(1) both trains of the CREFS remain operational,

(2) the known control room boundary breaches will be resealed in accordance with the implemented administrative controls prior to initiation of the CREFS,

(3) in the event of an accident in the operating unit (while the non-operating unit is in refueling outage to install the turbine generator protection system digital modification), one of the two trains of the CREFS will be aligned to provide protection to the control room operators, meeting the requirements of the GDC 19 of Appendix A to 10 CFR Part 50.

Item (2) as written is inconsistent with items (1) and (3) above. Alignment / initiation of the CREFS described in item (3) would likely occur during the same period the control room boundary breaches are being resealed. Item (2) should be revised to "following the onset of any accident the known control room boundary breaches will be resealed in accordance with the implemented administrative controls".

TXU Power Comments on NRC Safety Evaluation Related to
Amendment No. 120 to Facility Operating License No. NPF-87 and
Amendment No. 120 to Facility Operating License No. NPF-89

Comment 3

The following comments are considered editorial clarifications.

(a) NRC cover letter page 1, last paragraph: The letter states in part "...outage for Unit 1 (1RF11) in the fall of 2006, and for Unit 2 (2RF09) in the fall of 2005; respectively." should be "...outage for Unit 1 (1RF11) in the fall of 2005, and for Unit 2 (2RF09) in the fall of 2006; respectively." This is an editorial error, the discussion of outage dates in the Safety Evaluation are correct.

(b) NRC Safety Evaluation, page 3, 1st paragraph, last line: The Safety Evaluation states, "The NRC staff's evaluation of this commitment is contained in Section 3.5". Section 3.5 does not exist. The commitment is discussed again in Sections 3.1, 3.2, and 4.0 of the Safety Evaluation. This is an editorial error.

(c) NRC Safety Evaluation, page 3, 2nd paragraph, 5th line: The word "MSG-018" should be "MSG-1018". This is an editorial error. The CPSES procedure is correctly referenced on page 9 of the NRC Safety Evaluation.