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Ref: #10CFR50.90

CPSES-200502462
Log # TXX-05201

November 22, 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
RESPONSE TO FOLLOW-UP REQUEST FOR INFORMATION
RE: LICENSE AMENDMENT REQUEST (LAR) 02-07 FOR
REVISION TO TECHNICAL SPECIFICATION (TS) 3.8.1
SURVEILLANCE REQUIREMENT MODE RESTRICTION NOTES**

- REF:**
1. TXU Power letter, logged TXX-04143, from Mike Blevins to the U.S. Nuclear Regulatory Commission, dated October 6, 2004.
 2. TXU Power letter, logged TXX-05179, from Mike Blevins to the U.S. Nuclear Regulatory Commission, dated September 16, 2005.
 3. TAC MC 4912 and 4913 on SR Mode Restrictions

Gentlemen:

This letter is in response to your request for additional information regarding License Amendment Request 02-07 submitted by Reference 1, and our first round of RAI responses which were provided in Reference 2.

The NRC staff questions which were received from Mr. Mohan Thadani in an email to Dennis Buschbaum on November 1, 2005, are included in Attachment 1 to this letter and are followed by TXU Power's response.

Also, as requested by Mr. Thadani, a copy of recently approved Revision 4 to CPSES Station Administrative Procedure STA-629, "Switchyard Control," is currently available for your information.

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Page 2 of 2

This letter contains no new licensing basis commitments regarding CPSES Units 1 and 2. Should you have any questions, please contact Mr. M. J. Riggs at (254) 897-5218.

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

Executed on November 22, 2005.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

MJR
Attachment

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

**FOLLOW-UP RESPONSE TO NOVEMBER 1, 2005 RAI ON LAR 02-07
SURVEILLANCE REQUIREMENT MODE RESTRICTIONS
Re: TAC NOs. MC4912 and 4913**

The following CPSES responses are provided in response to NRC staff questions received from Mr. Mohan Thadani in an email to Dennis Buschbaum on November 1, 2005.

Question No. 1

The licensee's procedures on "Switchyard Control" Revision 4 is still in draft form. It is the new revision that addresses communication protocol with grid operator. The procedure has stated no expectations on how soon grid problems should be notified (page 49). The words used are "when possible.", "if possible," etc.,

We would like to see the final version of STA-629 procedure.

Response

Revision 4 to CPSES Station Administrative Procedure STA-629, "Switchyard Control," has been approved by the Station Operations Review Committee (SORC) and became effective on November 1, 2005. The current revised and approved version of this procedure is available for your review and information.

Station Administrative Procedure STA-629 is part of the Generation Interconnect Agreement for CPSES and defines responsibilities for the design, maintenance, document control, operation, and grid related notifications that are needed to control the various aspects of the CPSES switchyards, and to establish the necessary interfaces between CPSES and the transmission grid system operators. Revision 4 of this procedure enhances and clarifies this interface by adding new guidance that provides for the timely exchange of necessary and pertinent information. This guidance has been summarized and is added to the procedure in the form of Attachments 8.F, "Communications Protocol," and Attachment 8.G, "CPSES-TGM/GRT Communications Levels," and is also supported by Attachment 8.H, "CPSES Offsite Power System Performance Characteristics," and Attachment 8.I, "CPSES Generator and Transformer Performance Characteristics."

Where terms and phrases such as "as soon as practical" and "if possible" have been incorporated into the attachments providing communications guidance, they are utilized primarily where believed needed to acknowledge that certain situations and events may require immediate actions and may appropriately be followed by the making of timely notifications. This usage is consistent with similar guidance which is provided in the CPSES STA-202 Procedure Writer's Guide for the use of the term "should," which is used to indicate firm CPSES management expectations. Deviation is a departure from the norm and requires supervisory concurrence.

Question No. 2

Surveillance Requirement 3.8.1.19 and 3.8.1.11 have the following actions to be verified. Please indicate what part of the following could be done at mode 1 or 2? Recognize that DG starts to supply a dead bus.

- a. De-energization of emergency buses;**
- b. Load shedding from emergency buses;**
- c. DG auto-starts from standby condition and:**
 - 1. energizes permanently connected loads in 10 seconds,**
 - 2. energizes auto-connected shutdown loads through automatic load sequencer,**
 - 3. maintains steady state voltage ≥ 6480 V and ≤ 7150 V,**
 - 4. maintains steady state frequency ≥ 58.8 Hz and ≤ 61.2 Hz, and**
 - 5. supplies permanently connected and auto-connected shutdown loads for ≥ 5 minutes.**

Response

By incorporating the proposed LAR changes into the Mode Restriction Notes for SR 3.8.1.11 and SR 3.8.1.19, the following portions of these SRs may safely be performed during Modes 1 and 2, should a need be identified to demonstrate operability of the associated equipment.

Specifically, 1) recognizing that during Modes 1 and 2 the associated emergency bus shall remain operable, i.e., energized and capable of automatically loading its associated load group, and 2) that both SR 3.8.1.11 and SR 3.8.1.19 currently allow that a simulated loss of offsite power signal, or a simulated loss of offsite power signal in conjunction with a simulated SI actuation signal, respectively, may be used to perform the individual surveillances, then 3) that portion of SR part c. which demonstrates the "DG auto-start from standby condition," and that portion of SR part c.2 which demonstrates the initiation and operation of the "automatic load sequencer" up to but not including actual loading of the bus, provide examples of the portions of these surveillances that may be safely demonstrated and verified while remaining at-power.

Overall, it is not the intent of TXU Power to perform integrated testing of SR 3.8.1.11 or SR 3.8.1.19 during Modes 1 and 2, or to cause the de-energization of major safety busses or complete load shedding, but rather to perform only portions of these SRs as is indicated in the proposed note and as amplified by the associated TS Bases. As additional examples, similar portions of these surveillances have been previously performed during at-power operation when CPSES was allowed to complete the corrective actions described in Licensee Event Report (LER) 445/97-004-06 for Comanche Peak Steam Electric Station Units 1 and 2, "Issues Discovered During the Review of Generic Letter 96-01 Associated with Technical Specification Surveillances."

In particular, the following two event descriptions illustrate the portion of these SRs which were tested in order to perform the corrective actions identified in the LER:

(LER Event 6)

On March 3, 1998, during a review of Generic Letter (GL) 96-01, "Testing of the Safety-Related Logic Circuits," it was determined that the emergency diesel generator start signals on degraded voltages of the 6.9 kV and 480 V power supplies may not have been adequately verified. Corrective actions were identified to revise the applicable test procedures to incorporate the relays that are required to be tested

An enforcement discretion was requested by on March 3, 1998, (reference TU Electric letter to NRC logged TXX-98062 dated March 3, 1998), however the enforcement discretion was subsequently determined not to be necessary. The required surveillances were performed to verify that the affected relay contacts were in the correct position and the systems were declared operable within the allowed outage time. Applicable procedures have since been revised to incorporate the Technical Specification requirements with respect to verification of the contact in the closed position.

(LER Event 7)

On March 10, 1998, during a review of Generic Letter (GL) 96-01, "Testing of the Safety-Related Logic Circuits," it was determined that portions of the testing required by then Technical Specification requirements 4.8.1.1.2 .f.4b and 6b (currently SR 3.8.1.11c and SR 3.8.1.19c) had not been completely performed. Specifically, testing of the sequencer load group contacts to equipment was missing or could not be distinguished from other possible circuit actuations. Corrective actions were identified to revise the applicable test procedures to incorporate the sequencer load group contacts that are required to be tested.

An enforcement discretion was requested for CPSES Units 1 and 2 (refer to TU Electric letter to NRC logged TXX-98074 dated March 10, 1998). Temporary test procedures were prepared to incorporate the missing testing. The testing was conducted satisfactorily within the Technical Specification allowance of the TS 4.0.3. The enforcement discretion was for sufficient duration to process a License Amendment to allow the at-power tests to be credited to the surveillance requirement (reference LAR submitted by TXX-98076 dated march 12, 1998) The testing was completed satisfactorily and later credited to the surveillances.

This LER also provides further examples, such as those included in the descriptions and corrective actions completed for Events 8 and 10, whereby other specific portions of these SRs may be demonstrated when needed, by the use of specifically prepared temporary and overlapping test procedures.