

December 13, 2005

MEMORANDUM TO: David Terao, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Steven R. Jones, Acting Chief **/RA/**
Balance of Plant (BOP) Systems Branch
Division of Safety Systems

SUBJECT: SAFETY EVALUATION INPUT FOR LICENSE AMENDMENT REQUEST
(LAR) 04-013 TO REVISE TECHNICAL SPECIFICATION 3.7.5
AUXILIARY FEEDWATER SYSTEM (TAC NOS. MC5794 AND
MC5795)

By letter dated January 24, 2005, TXU Generation Company LP (TXU, the licensee) requested an amendment to Facility Operating Licenses DPR-87 and DPR-89 for Comanche Peak Steam Electric Station (CPSES) Unit 1 and 2, respectively. License Amendment Request (LAR) 04-013 proposes Technical Specification (TS) changes to TS 3.7.5, "Auxiliary Feedwater System (AFW)". Specifically, the proposed change would add a note to SRs 3.7.5.1, 3.7.5.3, and 3.7.5.4 that states "AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation."

The Plant Systems Branch (SPLB) has reviewed the licensee's amendment request and found the proposed license amendment change acceptable. Attached is our safety evaluation. This concludes SPLB's effort on TAC Nos. MC5794 and MC5795.

Docket Nos. 50-445, 50-446

CONTACT: R. Hernandez, SBPB/DSS/NRR
415-1079

December 13, 2005

MEMORANDUM TO: David Terao, Section Chief
Project Directorate IV-1
Division of Licensing Project Management

FROM: Steven R. Jones, Acting Chief */RA/*
Balance-of-Plant Section
Plant Systems Branch
Division of Systems Safety and Analysis

SUBJECT: SAFETY EVALUATION INPUT FOR LICENSE AMENDMENT REQUEST
(LAR) 04-013 TO REVISE TECHNICAL SPECIFICATION 3.7.5
AUXILIARY FEEDWATER SYSTEM (TAC NOS. MC5794 AND MC5795)

By letter dated January 24, 2005, TXU Generation Company LP (TXU, the licensee) requested an amendment to Facility Operating Licenses DPR-87 and DPR-89 for Comanche Peak Steam Electric Station (CPSES) Unit 1 and 2, respectively. License Amendment Request (LAR) 04-013 proposes Technical Specification (TS) changes to TS 3.7.5, "Auxiliary Feedwater System (AFW)". Specifically, the proposed change would add a note to SRs 3.7.5.1, 3.7.5.3, and 3.7.5.4 that states "AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation."

The Plant Systems Branch (SPLB) has reviewed the licensee's amendment request and found the proposed license amendment change acceptable. Attached is our safety evaluation. This concludes SPLB's effort on TAC Nos. MC5794 and MC5795.

Docket Nos. 50-445, 50-446

CONTACT: R. Hernandez, SPLB/DSSA/NRR
415-1079

DISTRIBUTION: ADAMS SPLB R/F RHernandez SJones MThadani
JHannon

DOCUMENT ACCESSION NUMBER: ML053410086 NRR-106

OFFICE	SPLB:DSSA	SPLB:DSSA
NAME	RHernandez	SJones
DATE	12/ 08 /05	12/ 13 /05

OFFICIAL RECORD COPY

SAFETY EVALUATION INPUT BY PLANT SYSTEM BRANCH
FOR LICENSE AMENDMENT REQUEST (LAR) 04-013) REVISION OF
TECHNICAL SPECIFICATION 3.7.5 AUXILIARY FEEDWATER SYSTEM
(TAC NOS. MC5794 AND MC5795)

1.0 INTRODUCTION

By letter dated January 24, 2005, TXU Generation Company LP (TXU, the licensee) requested an amendment to Facility Operating Licenses DPR-87 and DPR-89 for Comanche Peak Steam Electric Station (CPSES) Unit 1 and 2, respectively. License Amendment Request (LAR) 04-013 proposes Technical Specification (TS) changes to TS 3.7.5, "Auxiliary Feedwater System (AFW)". Specifically, the proposed change would add a note to SRs 3.7.5.1, 3.7.5.3, and 3.7.5.4 that states "AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation."

2.0 REGULATORY EVALUATION

NUREG-1431, Revision 1, Standard Technical Specifications, Westinghouse Plants, addresses dual use components for RHR (Residual Heat Removal). "An RHR train may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned to the ECCS mode of operation."

Industry Standard Technical Specification Change Traveler (TSTF) 245-A, Revision 1, "AFW Train Operable When in Service", was approved by the NRC staff on January 13, 1999. The approved TSTF proposed to add a note to SR 3.7.5.1, SR 3.7.5.3, and SR 3.7.5.4 that states "an AFW train may be considered operable during alignment and operation for steam generator level control, if capable of being realigned to the AFW mode of operation". The corresponding TS Basis are changed to reflect the added note.

3.0 EVALUATION

The licensee's proposed changes would add a note to SRs 3.7.5.1, 3.7.5.3, and 3.7.5.4 that states "AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation." The corresponding TS bases would also be changed to reflect the added note.

The licensee's safety evaluation is based on TSTF 245-A, Rev. 1. The NRC staff approved TSTF 245-A, Revision 1, "AFW Train Operable When in Service" on January 13, 1999. The Staff also verified that the licensee's TS are consistent with the Standard Technical Specifications. CPSES TS Conversion was approved by the NRC staff on February 26, 1999.

ATTACHMENT

The Staff determined that the licensee's proposed changes are consistent with the TS changes previously approved in TSTF 245-A, Rev.1. Therefore, the staff finds the licensee's proposed change to SR 3.7.5.1, SR 3.7.5.3, SR 3.7.5.4, and the respective TS Bases to be acceptable.

4.0 CONCLUSION

The staff concludes, based on the review of the licensees submitted information, that the proposed changes to SR 3.7.5.1, SR 3.7.5.2, SR 3.7.5.3, SR 3.7.5.4, and the respective TS Bases are in concurrence with the previously approved TSTF 245-A, Revision 1. Therefore, the staff finds the licensee's amendment request acceptable.