

TXU Power
Comanche Peak Steam
Electric Station
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Mike Blevins
Senior Vice President &
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Ref: 10CFR50.90

CPSSES-200601177
Log# TXX-06097
File# 00236

June 23, 2006

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSSES)
DOCKET NOS. 50-445 AND 50-446
SUPPLEMENT TO LICENSE AMENDMENT REQUEST (LAR) 05-
010 REVISION TO TECHNICAL SPECIFICATION 3.3.2, "ESFAS
INSTRUMENTATION," 3.5.2, "ECCS—OPERATING," AND 3.6.7,
"SPRAY ADDITIVE SYSTEM"**

- REF: 1. Letter logged TXX-05199, dated December 16, 2005 from Mr. Mike Blevins of TXU Power to the NRC
2. Letter logged TXX-05162, dated September 1, 2005 from Mr. Mike Blevins of TXU Power to the NRC
3. Letter logged TXX-06062, dated March 31, 2006 from Mr. Mike Blevins of TXU Power to the NRC

Dear Sir or Madam:

In Reference 1, TXU Generation Company LP (TXU Power) requested an amendment to the CPSSES Unit 1 Operating License (NPF-87) and CPSSES Unit 2 Operating License (NPF-89) to revise Technical Specifications 3.3.2, 3.5.2, and 3.6.7 entitled "ESFAS Instrumentation," "ECCS—Operating," and "Spray Additive System," respectively, in the CPSSES Units 1 and 2 Technical Specifications (TS). This change was requested pursuant to Generic Letter 2004-02 as described in Reference 2.

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

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TXU Power has reviewed the chemical buffering agents associated with Technical Specification 3.6.7 for maintaining the containment sump equilibrium pH >7.1. TXU Power has concluded that sodium hydroxide may be found to be the preferred buffering agent. A comparison of reduced NaOH to TSP and other alternate chemical buffers being investigated by the PWR Owner's Group is being performed. CPSES does not have calcium silicate insulation and its internal Containment structures have minimal bare (uncoated) concrete; therefore, TSP would be an acceptable buffering agent. However, if NaOH injection is reduced to stay in the same general pH range as TSP, it could be a superior buffering agent. TXU Power will advise the NRC of the status of these evaluations and any modifications in the scheduled GSI-191 responses to NRC questions.

Furthermore, TXU Power requested approval of the proposed License Amendment by July 1, 2006. TXU Power has further reviewed the implementation schedule and believes it is prudent to implement the proposed changes to Specification 3.5.2 and 3.6.7 within 120 days of approval of this License Amendment. Implementation of Specification 3.3.2 is needed for Unit 1 prior to completion of the 12th refueling outage in the spring of 2007 and for Unit 2 prior to completion of the 9th refueling outage scheduled in the fall of 2006. Attachment 1 provides a revised a markup of Technical Specification Table 3.3.2-1 reflecting the revised implementation schedule and Attachment 2 provides a retyped page of Table 3.3.2-1.

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

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Should you have any questions, please contact Mr. J. D. Seawright at (254) 897-0140.
I state under penalty of perjury that the foregoing is true and correct.

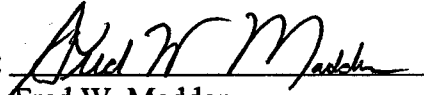
Executed on June 23, 2006.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

JDS

Attachment

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

Ms. Alice Rogers
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78756-3189

Table 3.3.2-1 (page 6 of 6)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE(a)
7. Automatic Switchover to Containment Sump					
a. Automatic Actuation Logic and Actuation Relays	1, 2, 3, 4	2 trains	C	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA
b. Refueling Water Storage Tank (RWST) Level - Low Low	1, 2, 3, 4	4	K	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≥ 43.9 31.9(b)% instrument span
Coincident with Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.				
8. ESFAS Interlocks					
a. Reactor Trip, P-4	1, 2, 3	1 per train, 2 trains	F	SR 3.3.2.11	NA
b. Pressurizer Pressure, P-11	1, 2, 3	3	L	SR 3.3.2.5 SR 3.3.2.9	≤ 1975.2 psig (Unit 1) ≤ 1976.4 psig (Unit 2)

(a) The Allowable Value defines the limiting safety system setting. See the Bases for the Trip Setpoints.
 (b) The Unit 1 RWST Level Low-Low Allowable Value will remain at ≥ 43.9% instrument span until completion of Cycle 12.

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