August 18, 2006

Mr. M. R. Blevins
Senior Vice President &
Chief Nuclear Officer
TXU Power
Attn: Regulatory Affairs Department
P. O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - LICENSE AMENDMENT REQUEST (LAR) 05-005, REVISION TO TECHNICAL SPECIFICATION 3.7.10, "CONTROL ROOM EMERGENCY FILTRATION/PRESSURIZATION SYSTEM (CREFS)" (TAC NOS. MC8163 AND MC8164).

Dear Mr. Blevins:

The Nuclear Regulatory Commission (NRC) staff has completed its initial review of the TXU Generation Company LP's (licensee's) proposed license amendment request (LAR) 05-005, dated August 22, 2005, for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The licensee requested a revision to Technical Specification (TS) 3.7.10, "Control Room Emergency Filtration/Pressurization System (CREFS)." It is our understanding that the submittal by CPSES is intended to revise TS 3.7.10 to address periodic verification of control room leakage and adds two new TSs, 5.5.20 and 5.6.11, "Control Room Integrity Program" and "Control Room Report," respectively.

The purpose of this letter is to convey the NRC staff's concerns, identified by our initial review of LAR 05-005.

The licensee stated that the acceptance limits used in the new Control Room Integrity Program will be based on assumptions of the radiological dose consequences calculations. The licensee also stated that CPSES is adopting new methods and assumptions as described in Regulatory Guide (RG) 1.195, "Methods and Assumptions for Evaluating Radiological Consequences of Design Basis Accidents at Light-Water Nuclear Power Reactors," May 2003. The licensee stated that, in discussions with the NRC's staff, it learned that adoption of RG 1.195 is contingent upon adoption of RG 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," May 2003, and RG 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," May 2003.

The licensee further stated in its submittal that it plans to complete Commitment Number 27301 and plans to submit a TS change to include periodic verification of control room in-leakage by September 30, 2004, or within 90 days after TS Task Force (TSTF) Standard TS Change Traveler TSTF-448 is available for use, whichever is later. The purpose of this letter is to state that the licensee's adoption of RGs 1.195, 1.196, and 1.197, as presented in the submittal, and completion of Commitment Number 27301, as described above, create a problem. We find that the TS change presented in the current submittal (i.e., periodic verification of control room

in-leakage) is unacceptable for several reasons, which include the use of the 550 days allowed outage time to restore the control room envelope to operable status. In addition, TSTF-448 is not available for use at this time, and its future availability for use is uncertain. Therefore, the NRC staff cannot move forward with the proposed request LAR 05-005, and recommends that you withdraw LAR 05-005 and resubmit it after TSTF-448 becomes available.

Please advise us within 30 days from the date of this letter of your decision to withdraw the license amendment or provide an alternative on how to resolve the above issues in an effective manner.

Sincerely,

/RA/

Mohan C. Thadani, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

cc: See next page

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Mohan C. Thadani, Senior Project Manager
Plant Licensing Branch IV
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Docket Nos. 50-445 and 50-446

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Comanche Peak Steam Electric Station

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