



Mike Blevins
Senior Vice President &
Chief Nuclear Officer

Ref: 10CFR50.90

TXU Power
Comanche Peak Steam
Electric Station
P. O. Box 1002 (E01)
Glen Rose, TX 76043
Tel: 254 897 5209
Fax: 254 897 6652
mike.blevins@txu.com

CPSSES-200601897
Log # TXX-06161
File # 00236

September 18, 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
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)

- REF:**
- 1) TXU Power Letter, Logged TXX-05127, from Mike Blevins to Nuclear Regulatory Commission, dated August 22, 2005
 - 2) NRC Letter from Mohan C. Thadani to M. R. Blevins, dated August 18, 2006
 - 3) TSTF Letter, Logged TSTF-06-18, from Technical Specifications Task Force to Nuclear Regulatory Commission, dated August 8, 2006

Gentlemen:

TXU Generation Company LP (TXU Power) submitted License Amendment Request 05-005 (Reference 1) to the CPSSES Unit 1 Operating License (NPF-87) and CPSSES Unit 2 Operating License (NPF-89). The NRC staff completed their initial review of Reference 1 and conveyed their concerns by letter dated August 18, 2006 (Reference 2).

The NRC noted some of their concerns with LAR-05-005 and that TSTF-448 was not available for use at this time and requested the licensee to provide an alternative to resolve the concerns identified. Reference 2 requested a response within 30 days from the date of Reference 2. This letter provides TXU Power's response.

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

Callaway - Comanche Peak - Diablo Canyon - Palo Verde - South Texas Project - Wolf Creek

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Reference 1 requested (1) approval of new methods and assumptions for evaluating the radiological consequences of design accidents resulting from the adoption of Regulatory Guide 1.195, "Methods and Assumptions for Evaluating Radiological Consequences of Design Accidents at Light-Water Nuclear Power Reactors," May 2003, and (2) approval of a proposed control room habitability program as described in proposed TS 3.7.10, "Control Room Emergency Filtration/Pressurization System (CREFS)" and TS 5.5.20, "Control Room Envelope Habitability Program." As noted in Reference 1, approval of the new methods and assumptions for radiological consequences is required to support the replacement of the Unit 1 steam generators in the spring of 2007. The new methods and assumptions were presented in FSAR Chapters 1, 6, and 15 for NRC review and approval in Attachment 6 of Reference 1. No concerns related to the new methods and assumptions for evaluating the radiological consequences were identified in Reference 2. Please continue your review of the new methods and assumptions for evaluating the radiological consequences as part of LAR-05-005 (TAC NOS. MC8163 and MC8164).

The control room habitability program provided in proposed Technical Specifications is not needed by TXU Power to support the steam generator replacement. However, previous discussions with the NRC staff indicated that NRC approval of the adoption of Regulatory Guide 1.195 is contingent upon adoption of a control room habitability program. Therefore, a proposed control room habitability program was submitted in Reference 1 and will be updated as described below.

On August 8, 2006, TSTF-448, Revision 3, "Control Room Habitability," was submitted to the NRC (Reference 3). Based on discussion with the Control Room Habitability Technical Specification Task Force, TXU Power understands that the NRC expects to publish TSTF-448, Revision 3, in the Federal Register for public comments by the end of September 2006. Upon issuance of the notice in the Federal Register of the availability of TSTF-448-R3 for public comment, TXU Power will submit a supplement to LAR-05-005. The supplement will update LAR-05-005 by revising the control room habitability program to be consistent with TSTF-448, Revision 3, and should address the NRC's concerns identified in Reference 2.

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

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Should you have any questions, please contact Mr. Carl B. Corbin at (254) 897-0121.

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

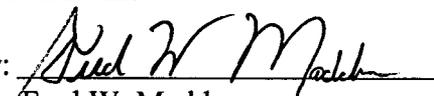
Executed on September 18, 2006.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

CBC

c - B. S. Mallet, 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