TXU Power

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Ref: 10CFR50.90

CPSES-200700571
Log # TXX-07064
File # 00236

March 19, 2007

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
SUPPLEMENT TO LICENSE AMENDMENT REQUEST (LAR) 05-06;
REVISION TO TECHNICAL SPECIFICATION (TS) 5.6.5
REVISE LISTING OF LOCA AND NON-LOCA ANALYSIS
METHODOLOGIES (TAC NOS. MD 0185/0186)

REF:
1. TXU Power letter, logged TXX-06011, from Mike Blevins to the NRC dated February 15, 2006.
2. NRC letter from Mohan C. Thadani to M.R. Blevins, dated March 15, 2007; Comanche Peak Steam Electric Station, Units 1 and 2 Safety Evaluation Regarding TXU Generation Company LP Request for Review of Topical Reports (TAC NO. MC6899).
3. TXU Power letter, logged TXX-07047, from Mike Blevins to the NRC dated February 22, 2007.

Dear Sir or Madam:

In order to reflect the conditions of use contained within the NRC Safety Evaluation (SE) of Reference 2, TXU Generation Company LP (TXU Power) intends to revise and reissue the subject Topical Reports as ERX-04-004-A, "Replacement Steam Generator Supplement To TXU Power's Large and Small Break Loss Of Coolant Accident Analysis Methodologies," Revision 0, March 2007 and ERX-04-005-A, "Application of TXU Power's Non-LOCA Transient Analysis Methodologies to a Feed Ring Steam Generator Design," Revision 0, March 2007.

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These -A revisions will incorporate the NRC SE, as well as responses to requests for additional information (RAIs) that were provided by TXU Power and referenced in the SE, into the Topical Reports to ensure that all information necessary to adequately make use of these methodologies to perform safety analysis for CPSES Unit 1 Cycle 13 is contained within the Topical Report itself. As such, the conditions of use contained within the NRC SE (e.g., PCT Penalty) become part of the Topical Report and TXU Power understands that use of the methodology obligates the licensee to implement the conditions. These revisions will not make any material changes to the Topical Reports other than that discussed above.

TXU Power believes that the titles, as well as the introductory content within the body of the reports, clearly identify that these Topical Reports are for use in analyses of CPSES Unit 1 only, and that no further actions or markings are necessary to ensure that the scope of the SE is implemented as approved.

In addition, and as stated in the NRC SE (Reference 2), the small break LOCA analysis presented in Topical Report ERX-04-004-A will be used to support the operation of Unit 1 Cycle 13 only. As such, the peak clad temperature (PCT) reported for the limiting Small Break LOCA analysis of record for Unit 1 Cycle 13 and for 10CFR50.46 annual reporting purposes will be 1830°F, plus the additional PCT penalty (250°F) as specified in Section 2.2.7 of the SE (Reference 2).

The submittal of an alternate accident analysis methodology, as specified by conditions 3 and 4 of the SE, will be made to enable future operating cycles subsequent to Unit 1 Cycle 13 and do not affect the safety analysis of Unit 1 Cycle 13 itself.

By means of the attachments to this letter, TXU Power hereby submits a revised Technical Specification page markup in order to reflect the revision of the Topical Reports discussed above. Attachment 1 provides the affected Technical Specification (TS) page markup. Attachment 2 provides the retyped Technical Specification page which incorporates the requested changes. The additional information provided in this letter and attachment does not impact the conclusions of the No Significant Hazards Consideration previously provided in Reference 1. In accordance with 10CFR50.91(b), TXU Power is providing the State of Texas with a copy of this proposed supplement to the amendment.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Should you have any questions, please contact Mr. Robert Kidwell at (254) 897-5310.

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

Executed on March 19, 2007.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: _____
Fred W. Madden
Director, Oversight and Regulatory Affairs

RJK

Attachments 1. Proposed Technical Specifications Changes
2. Retyped Technical Specification Page

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

ATTACHMENT 1 to TXX-07064

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Page 5.0-34

5.6 Reporting Requirements (continued)

5.6.5 Core Operating Limits Report (COLR) (continued)

10) TXX-88306, "Steam Generator Tube Rupture Analysis," March 15, 1988.

11) RXE-91-005-A, "Methodology for Reactor Core Response to Steamline Break Events," February 1994.

12) RXE-94-001-A, "Safety Analysis of Postulated Inadvertent Boron Dilution Event in Modes 3, 4, and 5," February 1994.

13) RXE-95-001-P-A, "Small Break Loss of Coolant Accident Analysis Methodology," September 1996.

14) Caldon, Inc. Engineering Report-80P, "Improving Thermal Power Accuracy and Plant Safety While Increasing Operating Power level Using the LEFM√ System," Revision 0, March 1997 and Caldon Engineering Report – 160P, "Supplement to Topical Report ER-80P; Basis for a Power Uprate With the LEFM√tm System," Revision 0, May 2000.

15) ERX-2001-005-P, "ZIRLO™ Cladding and Boron Coating Models for TXU Electric's Loss of Coolant Accident Analysis Methodologies," October 2001.

16) WCAP-10444-P-A, "Reference Core Report VANTAGE 5 Fuel Assembly," September 1985.

17) WCAP-15025-P-A, "Modified WRB-2 Correlation, WRB-2M, for Predicting Critical Heat Flux in 17x17 Rod Bundles for Modified LPD Mixing Vane Grids," April 1999.

18) WCAP-13060-P-A, "Westinghouse Fuel Assembly Reconstitution Evaluation Methodology," July, 1993.

c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.

d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

(continued)

19) ERX-04-004-A, "Replacement Steam Generator Supplement To TXU Power's Large and Small Break Loss Of Coolant Accident Analysis Methodologies," Revision 0, March 2007.

20) ERX-04-005-A, "Application of TXU Power's Non-LOCA Transient Analysis Methodologies to a Feed Ring Steam Generator Design," Revision 0, March 2007.

ATTACHMENT 2 to TXX-07064

RETYPED TECHNICAL SPECIFICATION PAGE

Page 5.0-34

5.6 Reporting Requirements (continued)

5.6.5 Core Operating Limits Report (COLR) (continued)

10) TXX-88306, "Steam Generator Tube Rupture Analysis," March 15, 1988.

11) RXE-91-005-A, "Methodology for Reactor Core Response to Steamline Break Events," February 1994.

12) RXE-94-001-A, "Safety Analysis of Postulated Inadvertent Boron Dilution Event in Modes 3, 4, and 5," February 1994.

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15) ERX-2001-005-P, "ZIRLO™ Cladding and Boron Coating Models for TXU Electric's Loss of Coolant Accident Analysis Methodologies," October 2001.

16) WCAP-10444-P-A, "Reference Core Report VANTAGE 5 Fuel Assembly," September 1985.

17) WCAP-15025-P-A, "Modified WRB-2 Correlation, WRB-2M, for Predicting Critical Heat Flux in 17x17 Rod Bundles for Modified LPD Mixing Vane Grids," April 1999.

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e. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.

f. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

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