

May 8, 2007

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 -
CLOSEOUT LETTER ADDRESSING RESPONSES TO GENERIC LETTER
2003-01, "CONTROL ROOM HABITABILITY" (TAC NOS. MB9790 AND
MB9791)

Dear Mr. Blevins:

By letter dated June 12, 2003 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML031620248), the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2003-01, "Control Room Habitability," to licensees of operating pressurized-water and boiling-water reactors to (1) alert licensees that applicable regulatory requirements may not be met and existing technical specification surveillance requirements may not be adequate, (2) emphasize the importance of reliable, comprehensive surveillance testing to verify control room habitability (CRH), (3) request information that demonstrates the control room complies with the current licensing basis, design basis, and applicable regulatory requirements, and that suitable control measures are in place to maintain this compliance, and (4) collect the requested information to determine if additional regulatory action is required. By letters dated December 4, 2003, and March 3, 2005 (CPSES-200302545 and -200500447, and ADAMS Accession Nos. ML033460389 and ML050690180, respectively), TXU Energy (the licensee) responded to the GL for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2.

The GL requested that the licensee confirm for the units that the control room meets the applicable habitability regulatory requirements and that the CRH systems are designed, constructed, configured, operated, and maintained in accordance with the facility's design and licensing basis, with emphasis on the following: (1) determination of the most limiting unfiltered and/or filtered inleakage into the control room and comparison to values used in your design bases for meeting control room operator dose limits from accidents (GL 2003-01, Item 1a), (2) determination that the most limiting unfiltered inleakage is incorporated into your hazardous chemical assessments (GL 2003-01, Item 1b), and (3) determination that reactor control capability is maintained in the control room or at the alternate shutdown location in the event of smoke (GL 2003-01, Item 1b). The GL further requested information on any compensatory measures in use at the units to demonstrate CRH, and the plans to retire them (GL 2003-01, Item 2).

In the above letters, the licensee reported the results of a "Component Test" of the control room using tracer gas, in accordance with Regulatory Guide 1.179 and American Society for Testing Materials (ASTM) Standard E741, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," for the units and stated that, for the units, the maximum tested value for unfiltered inleakage into the control room envelope (CRE) was 0 standard cubic feet per minute (scfm), which is less than the value of 12 scfm assumed in the design-basis radiological analyses for CRH.

The licensee also stated in its letters that there are no offsite or onsite storage or transportation of chemicals that pose a credible hazard to CRH and, thus, engineered controls for the control room are not required at the units to ensure CRH against a hazardous chemical threat. Therefore, the amount of unfiltered inleakage is not incorporated into the hazardous chemical assessment for the control room. Based on the offsite and onsite hazardous chemical analyses for the units, the conclusions of no credible hazard in the Final Safety Analysis Report (FSAR) remain valid. The reactor control capability is maintained from either the control room or the alternate remote shutdown panel in the event of smoke or toxic gas entering the control room.

The GL requested that the licensee assess the CPSES Technical Specifications (TSs) to determine if the TSs verify the integrity of the CRE, including ongoing verification of the inleakage assumed in the design-basis analysis for CRH, and in light of the demonstrated inadequacy of a delta (Δ) P measurement to alone provide such verification (GL Item 2003-01, Item 1c). In response to the GL, by letter dated October 23, 2006 (CPSES-200602131, ADAMS Accession No. ML063040564), the licensee submitted a license amendment request to revise the TSs regarding CRH in accordance with NRC-approved Technical Specification Task Force Traveler 448, Revision 3 (TSTF-448R3) using the consolidated line item improvement process. On March 26, 2007, NRC issued Amendment No. 136 for CPSES, Units 1 and 2, which revised the TSs in accordance with TSTF-448R3 (ADAMS Accession No. ML070730037).

The licensee also stated that it does not use compensatory measures to demonstrate CRH for the units, is committed to the general design criteria (GDC) in Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR Part 50), as documented in Section 3.1 of the CPSES FSAR, and has acted to ensure continued compliance with the CRH design and licensing basis. These statements support the conclusion that the units are required to meet the GDC regarding CRH.

The licensee also stated that corrective actions for addressing the filtered inleakage condition were in the CPSES Corrective Action Program. Since this filtered inleakage can be significantly reduced by damper manipulation, the licensee decided to replace six dampers with bubble tight dampers to reduce the filtered inleakage to the CRE and provide an effective isolation mode for the control heating ventilation and air conditioning system. In its March 3, 2005, letter, the licensee stated that the modifications would be completed in 2005. In its letter dated May 7, 2007 (letter not available in ADAMS at this time), the licensee stated that the modifications were completed in 2005.

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Based on the above, the NRC staff concludes that the licensee's response to GL 2003-01 for CPSES is acceptable and no further action is required. This letter closes out the subject TACs for CPSES, Units 1 and 2. If you have any questions regarding this correspondence, contact Mohan Thadani at 301-415-1476.

Sincerely,

/RA/

Jack Donohew, 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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Docket Nos. 50-445 and 50-446

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Comanche Peak Steam Electric Station

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