



**Luminant**

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Ref. # 10CFR50.90

November 30, 2007

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

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446, SUPPLEMENT TO LICENSE AMENDMENT  
REQUEST (LAR) 06-012, RESPONSE TO REQUEST FOR ADDITIONAL  
INFORMATION RELATED TO ADMINISTRATIVE CONTROLS  
(TAC NOS. MD4070 AND MD4071)**

**REFERENCE: 1. Letter logged TXX-06189 dated December 19, 2006, License Amendment Request (LAR) 06-012, revision to Technical Specification (TS) 3.7.5, "Auxiliary Feedwater (AFW) System," TS 3.8.1, "Ac Sources - Operating," TS 3.8.9, "Distribution Systems - Operating," And TS Example 1.3-3" from Mike Blevins to the NRC.**

Dear Sir or Madam:

Per Reference 1, Luminant Generation Company LLC (Luminant Power) submitted proposed changes to the Comanche Peak Steam Electric Station, herein referred to as Comanche Peak Nuclear Power Plant (CPNPP), Unit 1 and 2 Technical Specifications to allow the deletion of second completion times. Included in Reference 1 was a discussion of administrative controls. As a result of subsequent discussions on November 28, 2007, between the NRC Staff (Fred Lyon, et.al.) and Luminant Power (Tim Hope, et.al.), Luminant Power is providing additional information related to administrative controls.

Page 2 of Enclosure 1 to Reference 1 proposed to revise TS Example 1.3-3 by eliminating the second Completion Times and replacing the discussion regarding second Completion Times with the following:

"It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended."

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The administrative controls described in the above insert will be captured by the following new licensing basis commitment regarding Comanche Peak Units 1 and 2.

<u>Number</u>	<u>Commitment</u>	<u>Due Date/Event</u>
27488	There shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO for TS 3.7.5 Auxiliary Feedwater (AFW) System, TS 3.8.1, A.C. Sources - Operating, and TS 3.8.9, Distribution Systems - Operating. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended. The administrative controls will ensure that Completion Time is NOT extended beyond the additive Completion Times of the two (2) Required Actions for restoration of OPERABILITY unless a risk evaluation is performed. If Unit Operation within an LCO will exceed the maximum Completion Time, then either the shutdown Condition within the LCO should be entered OR a risk evaluation shall be performed and the risk impact managed under the Configuration Risk Management Program (CRMP).	Commitment 27488 will be implemented in conjunction with the license amendment.

The site procedure for the LCO tracking program will be revised to incorporate Commitment 27488 and will be effective upon implementation of the license amendment.

The commitment number is used by Luminant Power for the internal tracking of Comanche Peak commitments.

The No Significant Hazards Considerations provided in Reference 1 remains valid and is not changed by this supplement to LAR 06-012.

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

Should you have any questions, please contact Mr. Carl Corbin at (254) 897-0121 or [carl.corbin@luminant.com](mailto:carl.corbin@luminant.com).

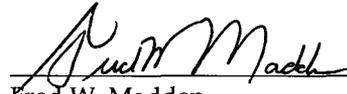
I state under penalty of perjury that the foregoing is true and correct.

Executed on November 30, 2007.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

By: 

Fred W. Madden

Director, Oversight & Regulatory Affairs

c - E. E. Collins, Region IV  
B. K. Singal, NRR  
Resident Inspectors, Comanche Peak

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