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CP-200700217
Log # TXX-07189

Ref. # 10CFR50.90

December 13, 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) 07-006
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO
PROPOSED TECHNICAL SPECIFICATIONS REVISION TO REFLECT
CYCLE-SPECIFIC SAFETY ANALYSIS ASSUMPTIONS REGARDING ADOPTION OF
WESTINGHOUSE METHODOLOGIES
(TAC NOS. MD6561 AND MD6562)

REFERENCE: Letter logged TXX-07108 dated August 16, 2007 from Mike Blevins to the NRC submitting License Amendment Request (LAR) 07-006, proposing revisions to Technical Specifications 3.1.4, "ROD GROUP ALIGNMENT LIMITS," TABLE 3.3.1-1, "REACTOR TRIP SYSTEM INSTRUMENTATION," TABLE 3.3.2-1, "ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION," 3.4.10, "PRESSURIZER SAFETY VALVES," 3.7.1, "MAIN STEAM SAFETY VALVES (MSSVs)," and Table 3.7.1-1, "OPERABLE MAIN STEAM SAFETY VALVES VERSUS MAXIMUM ALLOWABLE POWER."

Dear Sir or Madam:

Per Reference 1, Luminant Generation Company, LLC (Luminant Power) requested Technical Specification (TS) changes to reflect the results of the cycle-specific safety analysis for Comanche Peak Steam Electric Station, Units 1 and 2.

On November 19, 2007, the NRC provided Luminant Power with a request for additional information regarding the large and small break loss-of-coolant accident analyses for Comanche Peak. The response to Question 1 is provided in Attachment 1. The response to Questions 2, 3, and 4 are provided in Attachment 2. As Attachment 1 contains information proprietary to Westinghouse Electric Company LLC, Attachment 3 provides a non-proprietary version of Attachment 1. Attachment 4 provides a revised markup to Technical Specifications pages related to NRC questions 2, 3, and 4.

Attachment 1 contains information proprietary to Westinghouse Electric Company LLC, and is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission

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A001
NRC

and addresses with specificity the considerations listed in paragraph (b) (4) of Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of Attachment 1 or the supporting Westinghouse affidavit should reference CAW-07-2362 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

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

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

Should you have any questions, please contact Mr. J. D. Seawright at (254) 897-0140.

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

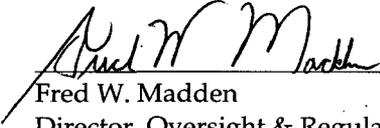
Executed on December 13, 2007.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

By:


Fred W. Madden

Director, Oversight & Regulatory Affairs

- Attachment -
1. Response to NRC Request for Additional Information related to License Amendment Request (LAR) 07-006 - Question 1 (Proprietary)
 2. Response to NRC Request for Additional Information related to License Amendment Request (LAR) 07-006 - Questions 2, 3, and 4
 3. Response to NRC Request for Additional Information related to License Amendment Request (LAR) 07-006 - Question 1 (Non-Proprietary)
 4. Revised Markup to Technical Specifications for LAR 07-006

Enclosure - Westinghouse authorization letter CAW-07-2362 with accompanying affidavit, Proprietary Information Notice and Copyright Notice.

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

Alice Rogers
Environmental & Consumer Safety Section
Texas Department of State Health Services
1100 West 49th Street
Austin, Texas 78756-3189

Attachment 3 to TXX-07189

**Response to NRC Request for Additional Information
related to License Amendment Request (LAR) 07-006**

Question 1

(Non-Proprietary)

Westinghouse Non-Proprietary Class 3

**WPT-17079
ATTACHMENT 1**

**Response to NRC Instrumentation and Controls Branch
Request for Additional Information dated November 19, 2007**

Westinghouse Electric Company LLC
P.O. Box 355
Pittsburgh, PA 15230-0355

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Comanche Peak – RAI Response

For the changes to the Allowable Values in TS Tables 3.3.1-1 and 3.3.2-1, provide the following information:

Setpoint Calculation Methodology: Provide documentation (including sample calculations) of the methodology used for establishing the limiting setpoint (or NSP) and the limiting acceptable values for the As-Found and As-Left setpoints as measured in periodic surveillance testing as described below. Indicate the related Analytical Limits and other limiting design values (and the sources of these values) for each setpoint.

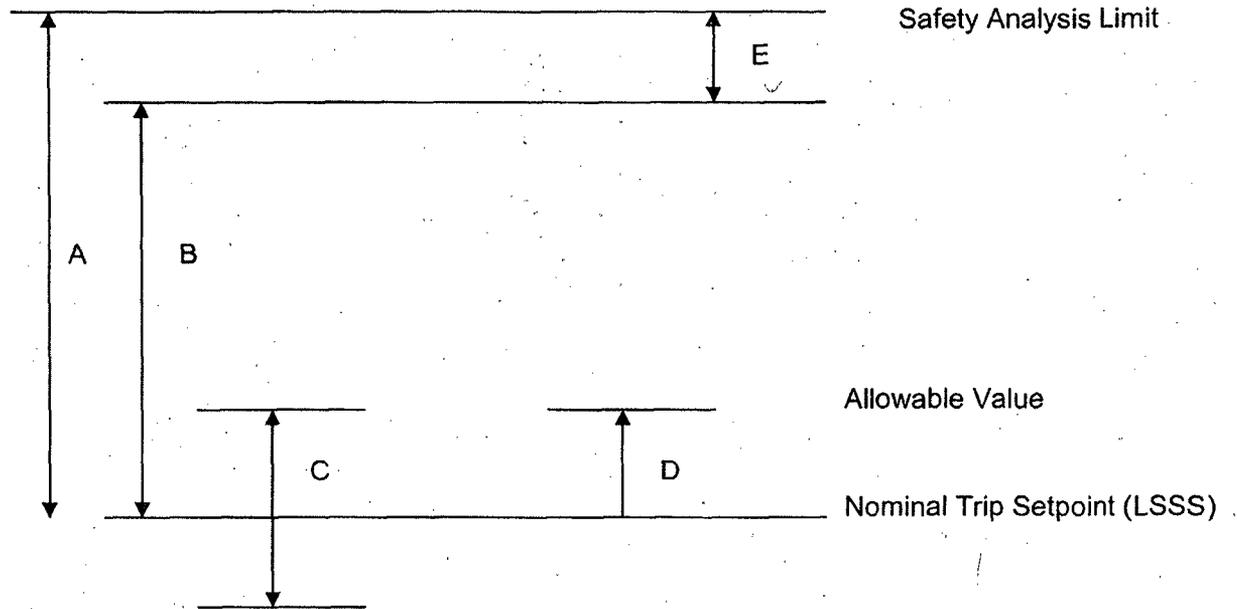
Response:

As noted in Section 4.0 of Attachment 1 of TXX-07108, the basic uncertainty algorithm used to determine the overall instrument uncertainty for the RTS/ESFAS trip functions is the square-root-sum-of-the squares (SRSS) of the applicable uncertainty terms. This is the same methodology as defined in WCAP-12123 as modified for term dependencies as shown on the attached tables. All appropriate and applicable uncertainties, as defined by a review of the plant baseline design input documentation, have been included in each RTS/ESFAS trip function uncertainty calculation (see attached calculations). This approach is consistent with NRC Regulatory Guide 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," and ISA Standard 67.04.01-2006, "Setpoints for Nuclear Safety-Related Instrumentation." It is believed that the total channel uncertainty, or channel statistical allowance (CSA) calculated is at a 95 percent probability and 95 percent confidence level (95/95) as requested by Regulatory Guide 1.105.

In contrast with the methodology described in WCAP-12123, but consistent with the NRC's RIS 06-17 and the proposed TSTF-493, Revision 2, the Allowable Values (AVs) for the Comanche Peak Technical Specifications changed for this LAR are determined by adding (or subtracting) the calibration accuracy, defined by the RCA term (see attached Tables), of the tested channel during the Channel Operational Test to the NTS in the non-conservative direction (i.e., toward or closer to the SAL) for the application. The magnitude of the as left (calibration accuracy term) and the as found tolerances are the same and are specified in the station procedures. It is noted in the attached tables that there are differences in the Unit 1 and Unit 2 steam generator level uncertainties due to the physical differences in steam generator design (model $\Delta 76$ versus model D5) including generator geometries and instrument tap locations. These differences result in different instrument spans and thus variation in the PMA and instrument uncertainty allowances.

This methodology is described in the proposed BASES to TS 3.3.1. Figure 1 provides a visual description of the setpoint relationships. This methodology has been recently reviewed and approved by the NRC for the Beaver Valley Power Uprate Program and the Callaway Replacement Steam Generator (RSG) Program.

Table 2.1-3 (Overtemperature and Overpower N-16 Setpoints) and Table 2.1-4 (Summary of RTS and ESFAS Functions Actuated) of Attachment 2 to TXX-07126 (CPNPP Transition of Methods-Safety Analyses) documents the related analytical limit for each setpoint.



- F. Total Allowance
- G. Channel Statistical Allowance
- H. Acceptable as left and as found Condition
- I. Allowable Value, As Found
- J. Margin

LSSS – Limiting Safety System Setting

Figure 1. Nuclear Safety-Related Setpoint Relationship

**Table 3-1
 Comanche Peak
 Power Range Neutron Flux – High & Low Setpoints**

Parameter	Allowance * a,c
Process Measurement Accuracy [] ^{a,c} [] ^{a,c}	
Primary Element Accuracy (PEA)	
Sensor Calibration Accuracy (SCA) [] ^{a,c}	
Sensor Reference Accuracy (SRA)	
Sensor Measurement & Test Equipment Accuracy (SMTE) Allowance for use of the panel meters in place of a DMM	
Sensor Pressure Effects (SPE)	
Sensor Temperature Effects (STE) [] ^{a,c}	
Sensor Drift (SD) [] ^{a,c}	
Rack Calibration Accuracy (RCA)	
Rack Measurement & Test Equipment Accuracy (RMTE)	
Rack Temperature Effect (RTE)	
Rack Drift (RD)	
Tag Numbers: N41, N42, N43, N44	

*In percent span (120 % RTP)

Table 3-1 (continued)
Comanche Peak
Power Range Neutron Flux – High & Low Setpoints

Channel Statistical Allowance =

$$\sqrt{PMA_1^2 + PMA_2^2 + PEA^2 + (SMTE + SCA)^2 + (SMTE + SD)^2 + SPE^2 + STE^2 + SRA^2 + (RMTE + RCA)^2 + (RMTE + RD)^2 + RTE^2}$$

a.c



**Table 3-2
Comanche Peak
Overtemperature N-16 Setpoint**

<u>Parameter</u>	<u>Allowance*</u>
Process Measurement Accuracy (PMA)	a,c
$\begin{matrix} 16_N & - & [\\ 16_N & - & \\ 16_N & - & \\ 16_N & - & \\ \Delta q & - & \\ \Delta q & - & \\ T_{cold} & - & \end{matrix}$	
Primary Element Accuracy (PEA)	
Sensor Reference Accuracy (SRA)	a,c
$\begin{matrix} T_{cold} & - & [\\ Pressure & - & \end{matrix}$	
Sensor Calibration Accuracy (SCA)	a,c
$\begin{matrix} 16_N & - & [\\ Pressure & - & \end{matrix}$	
Sensor Measurement & Test Equipment Accuracy (SMTE)	a,c
$\begin{matrix} Pressure & - & [\\ & & \end{matrix}$	
Sensor Pressure Effects (SPE)	
Sensor Temperature Effects (STE)	a,c
$\begin{matrix} 16_N & - & [\\ Pressure & - & \end{matrix}$	
Sensor Drift (SD)	a,c
$\begin{matrix} 16_N & - & [\\ Pressure & - & \end{matrix}$	
Sensor Bias	a,c
$\begin{matrix} Pressure & - & [\\ & & \end{matrix}$	
Environmental Allowance (EA)	

Table 3-2 (continued)
Comanche Peak
Overtemperature N-16 Setpoint

<u>Parameter</u>	<u>Allowance*</u>
Rack Calibration (RCA)] a,c
16 _N - [
T _C - [
T _C - [
Pressure - [
Δq - [
Δq - [
Rack Measurement & Test Equipment Accuracy (RMTE)	
16 _N - [
T _C - [
Pressure - [
Δq - [
Δq - [
Rack Temperature Effects (RTE)	
Rack Drift (RD)	
16 _N - [
T _C - [
Pressure - [
Δq - [
Δq - [
* In % OTN-16 span [] a,c

Channel Statistical Allowance =

$$\begin{aligned} & \{(PMA_1)^2 + (PMA_2)^2 + (PMA_3)^2 + (PMA_4)^2 + \{(SRA_i)^2/1^{\#}\} + \\ & (SMTE_p + SD_p)^2 + (STE_p)^2 + (SRA_p)^2 + (SMTE_p + SCA_p)^2 + \\ & (RMTE_{16N} + RD_{16N})^2 + RTE^2 + (RMTE_{16N} + RCA_{16N})^2 + \\ & (RMTE_i + RD_i)^2 + (RMTE_i + RCA_i)^2 + \{(RE_i)^2/1^{\#}\} + \\ & (RMTE_p + RD_p)^2 + (RMTE_p + RCA_p)^2 + \\ & (RMTE_{q1} + RD_{q1})^2 + (RMTE_{q1} + RCA_{q1})^2 + \\ & (RMTE_{q2} + RD_{q2})^2 + (RMTE_{q2} + RCA_{q2})^2\}^{1/2} + Bias_1 + Bias_2 + Bias_3 \end{aligned}$$

] a,c
--	-------

Number of credited cold leg RTDs per reactor coolant loop

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**Table 3-3
Comanche Peak
Overpower N-16 Setpoint**

<u>Parameter</u>	<u>Allowance*</u>
Process Measurement Accuracy (PMA)	<div style="text-align: right; margin-right: 5px;">a,c</div> <div style="border: 1px solid black; width: 100%; height: 100%;"></div>
16 _N - [
Primary Element Accuracy (PEA)	
Sensor Calibration (SCA)	
16 _N - [] ^{a,c}	
Sensor Measurement & Test Equipment Accuracy (SMTE)	
Sensor Pressure Effects (SPE)	
Sensor Temperature Effects (STE)	
16 _N - [] ^{a,c}	
Sensor Drift (SD)	
16 _N - [] ^{a,c}	
Environmental Allowance (EA)	
T _{cold} - [] ^{a,c}	
Rack Calibration (RCA)	
16 _N - [] ^{a,c}	
Rack Measurement & Test Equipment Accuracy (RMTE)	
16 _N - [] ^{a,c}	
Rack Temperature Effects (RTE)	
Rack Drift (RD)	
16 _N - [] ^{a,c}	

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Table 3-3 (continued)
Comanche Peak
Overpower N-16 Setpoint

* In % OPN-16 span []^{a,c}

Channel Statistical Allowance =

$$\{ (PMA_1)^2 + (PMA_2)^2 + (RMTE + RD)^2 + (RTE)^2 + (RMTE + RCA)^2 \}^{1/2} +$$

$$Bias_1 + Bias_2 + EA = 3.5\% \text{ span}$$

[]^{a,c}

**Table 3-4
Comanche Peak Unit 1 ($\Delta 76$ SG)
Steam Generator Water Level – Low-Low Reactor Trip Instrument Uncertainty**

Parameter	Allowance*	
Process Measurement Accuracy (PMA)**] a,c	
[] a,c		
Primary Element Accuracy (PEA)		
Sensor Calibration Accuracy (SCA)		
Sensor Reference Accuracy (SRA)		
Sensor Measuring & Test Equipment Accuracy (SMTE)		
Sensor Pressure Effects (SPE)		
Sensor Temperature Effects (STE)		
Sensor Drift (SD)		
Environmental Allowance (EA)**		
[] a,c		
Bias**		
[] a,c		
Rack Calibration Accuracy (RCA)		
Rack Measuring & Test Equipment Accuracy (RMTE)		
Rack Temperature Effect (RTE)		
Rack Drift (RD)		
* In percent span (100 %)		
** [] a,c		

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Table 3-4 (Continued)
Comanche Peak Unit 1 ($\Delta 76$ SG)
Steam Generator Water Level – Low-Low Reactor Trip Instrument Uncertainty

Channel Statistical Allowance =

$$\begin{aligned} & \{(PEA)^2 + (SMTE + SD)^2 + (SRA)^2 + (SPE)^2 + (STE)^2 + \\ & (SMTE + SCA)^2 + (RMTE + RD)^2 + (RTE)^2 + (RMTE + RCA)^2\}^{1/2} + \\ & BIAS_1 + BIAS_2 + BIAS_3 + \{(EA_1)^2 + (EA_2)^2\}^{1/2} + EA_3 + \\ & PMA_{PP} + PMA_{RL} + PMA_{FV} + PMA_{SC} + PMA_{MD} + PMA_{ID} + PMA_{DL} \end{aligned}$$

[

]

a,c

Table 3-5
Comanche Peak Unit 1 ($\Delta 76$ SG)
Steam Generator Water Level – High-High ESFAS Trip Instrument Uncertainty

Parameter	Allowance*
Process Measurement Accuracy (PMA)**	
[] ^{a,c}	
Primary Element Accuracy (PEA)	
Sensor Calibration Accuracy (SCA)	
Sensor Reference Accuracy (SRA)	
Sensor Measuring & Test Equipment Accuracy (SMTE)	
Sensor Pressure Effects (SPE)	
Sensor Temperature Effects (STE)	
Sensor Drift (SD)	
Environmental Allowance (EA)**	
Bias**	
[] ^{a,c}	
Rack Calibration Accuracy (RCA)	
Rack Measuring & Test Equipment Accuracy (RMTE)	
Rack Temperature Effect (RTE)	
Rack Drift (RD)	

* In percent span (100 %)

** []^{a,c}

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Table 3-5 (Continued)
Comanche Peak Unit 1 (Δ76 SG)
Steam Generator Water Level – High-High ESFAS Trip Instrument Uncertainty

Channel Statistical Allowance =

$$\begin{aligned} & -\{(PEA)^2 + (SMTE + SD)^2 + (SRA)^2 + (SPE)^2 + (STE)^2 \\ & + (SMTE + SCA)^2 + (RMTE + RD)^2 + (RTE)^2 + (RMTE + RCA)^2\}^{1/2} + \\ & BIAS_1 + BIAS_4 + EA + \\ & PMA_{PP} + PMA_{RL} + PMA_{FV} + PMA_{SC} + PMA_{MD} + PMA_{ID} + PMA_{DL} \end{aligned}$$

[]^{a,c}

Note: Negative sign (“-”) denotes direction (i.e. indicates lower than actual).

**Table 3-6
 Comanche Peak Unit 2 (D5 SG)
 Steam Generator Water Level – Low-Low Reactor Trip Instrument Uncertainty**

Parameter	Allowance*
Process Measurement Accuracy (PMA)**	a,c
<div style="border: 1px solid black; height: 165px; width: 277px;"></div>	<div style="border: 1px solid black; height: 622px; width: 80px;"></div>
Primary Element Accuracy (PEA)	
Sensor Calibration Accuracy (SCA)	
Sensor Reference Accuracy (SRA)	
Sensor Measuring & Test Equipment Accuracy (SMTE)	
Sensor Pressure Effects (SPE)	
Sensor Temperature Effects (STE)	
Sensor Drift (SD)	
Environmental Allowance (EA)**	
<div style="border: 1px solid black; height: 56px; width: 273px;"></div>	
Bias**	
<div style="border: 1px solid black; height: 66px; width: 368px;"></div>	
Rack Calibration Accuracy (RCA)	
Rack Measuring & Test Equipment Accuracy (RMTE)	
Rack Temperature Effect (RTE)	
Rack Drift (RD)	
* In percent span (100 %)	
** [] a,c	

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Table 3-6 (Continued)
Comanche Peak Unit 2 (D5 SG)
Steam Generator Water Level – Low-Low Reactor Trip Instrument Uncertainty

Channel Statistical Allowance =

$$\begin{aligned} & \{(\text{PEA})^2 + (\text{SMTE} + \text{SD})^2 + (\text{SRA})^2 + (\text{SPE})^2 + (\text{STE})^2 + \\ & (\text{SMTE} + \text{SCA})^2 + (\text{RMTE} + \text{RD})^2 + (\text{RTE})^2 + (\text{RMTE} + \text{RCA})^2\}^{1/2} + \\ & \text{BIAS}_1 + \text{BIAS}_2 + \text{BIAS}_3 + \{(\text{EA}_1)^2 + (\text{EA}_3)^2\}^{1/2} + \text{EA}_2 + \\ & \text{PMA}_{\text{PP}} + \text{PMA}_{\text{RL}} + \text{PMA}_{\text{FV}} + \text{PMA}_{\text{SC}} + \text{PMA}_{\text{MD}} + \text{PMA}_{\text{ID}} + \text{PMA}_{\text{DL}} \end{aligned}$$

[

] a,c

Table 3-7
Comanche Peak Unit 2 (D5 SG)
Steam Generator Water Level – High-High ESFAS Trip Instrument Uncertainty

Parameter	Allowance*
Process Measurement Accuracy (PMA)**	
[] ^{a,c}	
Primary Element Accuracy (PEA)	
Sensor Calibration Accuracy (SCA)	
Sensor Reference Accuracy (SRA)	
Sensor Measuring & Test Equipment Accuracy (SMTE)	
Sensor Pressure Effects (SPE)	
Sensor Temperature Effects (STE)	
Sensor Drift (SD)	
Environmental Allowance (EA)**	
Bias**	
[] ^{a,c}	
Rack Calibration Accuracy (RCA)	
Rack Measuring & Test Equipment Accuracy (RMTE)	
Rack Temperature Effect (RTE)	
Rack Drift (RD)	

* In percent span (100 %)

** []^{a,c}

Table 3-7 (Continued)
Comanche Peak Unit 2 (D5 SG)
Steam Generator Water Level – High-High ESFAS Trip Instrument Uncertainty

Channel Statistical Allowance =

$$\begin{aligned} & -\{(\text{PEA})^2 + (\text{SMTE} + \text{SD})^2 + (\text{SRA})^2 + (\text{SPE})^2 + (\text{STE})^2 \\ & + (\text{SMTE} + \text{SCA})^2 + (\text{RMTE} + \text{RD})^2 + (\text{RTE})^2 + (\text{RMTE} + \text{RCA})^2\}^{1/2} + \\ & \text{BIAS}_1 + \text{BIAS}_5 + \text{EA} + \\ & \text{PMA}_{\text{PP}} + \text{PMA}_{\text{RL}} + \text{PMA}_{\text{FV}} + \text{PMA}_{\text{SC}} + \text{PMA}_{\text{MD}} + \text{PMA}_{\text{ID}} + \text{PMA}_{\text{DL}} \end{aligned}$$

[] a,c

Note: Negative sign ("-") denotes direction (i.e. indicates lower than actual).

Attachment 4 to TXX-07189

**Revised Markup to Technical Specifications
For LAR 07-006**

Pages: 3.3.17
3.3.32
3.3.33

Table 3.3.1-1 (page 3 of 6)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE(a)
10. Reactor Coolant Flow - Low	1(g)	3 per loop	M	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR 3.3.1.16	≥ 88.6% of indicated loop flow (Unit 1) ≥ 88.8% of indicated loop flow (Unit 2)
11. Not Used					
12. Undervoltage RCPs	1(g)	1 per bus	M	SR 3.3.1.9 SR 3.3.1.10 SR 3.3.1.16	≥ 4753 V
13. Underfrequency RCPs	1(g)	1 per bus	M	SR 3.3.1.9 SR 3.3.1.10 SR 3.3.1.16	≥ 57.06 Hz
14. Steam Generator (SG) Water Level Low-Low (l)	1, 2	4 per SG	E	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR 3.3.1.16	<div style="border: 1px solid black; padding: 2px; display: inline-block;">37.5%###</div> → ≥ 36% of narrow range instrument span (Unit 1) ^{(a)(r)} <div style="border: 1px solid black; padding: 2px; display: inline-block;">34.9%</div> → ≥ 33.4% of narrow range instrument span (Unit 2) ^{(a)(r)}
15. Not Used.					
16. Turbine Trip					
a. Low Fluid Oil Pressure	1(j)	3	O	SR 3.3.1.10 SR 3.3.1.15	≥ 46.6 psig
b. Turbine Stop Valve Closure	1(j)	4	P	SR 3.3.1.10 SR 3.3.1.15	≥ 1% open

except for Trip Functions 2a, 2b, 6, 7, and 14 (the Nominal Trip Setpoint defines the limiting safety system setting for these Trip Functions)

Nominal

(continued)

- (a) The Allowable Value defines the limiting safety system setting. See the Bases for the Trip Setpoints.
- (g) Above the P-7 (Low Power Reactor Trips Block) interlock.
- (j) Above the P-9 (Power Range Neutron Flux) interlock.
- (l) The applicable MODES for these channels in Table 3.3.2-1 are more restrictive.
- (q) If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.
- (r) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the Nominal Trip Setpoint, or a value that is more conservative than the Trip Setpoint; otherwise, the channel shall be declared inoperable. The Nominal Trip Setpoint, the methodology used to determine the as-found tolerance and the methodology used to determine the as-left tolerance shall be specified in the Technical Specification Bases.

For Unit 1, through Cycle 13, the ALLOWABLE VALUE for the Steam Generator Water Level Low-Low remains at 36% of narrow range instrument Span.

Table 3.3.2-1 (page 4 of 6)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE(a)
5. Turbine Trip and Feedwater Isolation					
a. Automatic Actuation Logic and Actuation Relays	1, 2(j)	2 trains	H	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	
b. SG Water Level -- High High (P-14)	1, 2(i)	3 per SG(P)	I	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="border: 1px solid black; padding: 2px;">84.5%#</div> <div style="margin: 2px;">→</div> <div style="margin: 2px;">NA</div> <div style="margin: 2px;">↓</div> <div style="margin: 2px;">≤ 86% of narrow range span (Unit 1)^{(q)(r)}</div> <div style="margin: 2px;">↓</div> <div style="margin: 2px;">≤ 83.5% of narrow range span (Unit 2)^{(q)(r)}</div> <div style="margin: 2px;">↓</div> <div style="border: 1px solid black; padding: 2px;">82.0%</div> </div>
c. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.				

except for functions 5b and 6c (the Nominal Trip Setpoint defines the limiting safety system setting for these Trip Functions)

Nominal

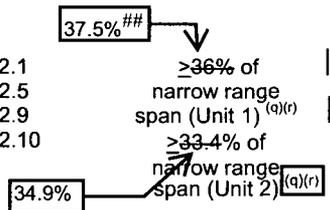
(continued)

- (a) The Allowable Value defines the limiting safety system setting. See the Bases for the Trip Setpoints.
- (j) Except when all MFIVs and associated bypass valves are closed and de-activated or isolated by a closed manual valve.
- (p) A channel selected for use as an input to the SG water level controller must be declared inoperable.
- (q) If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.
- (r) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the Nominal Trip Setpoint, or a value that is more conservative than the Trip Setpoint; otherwise, the channel shall be declared inoperable. The Nominal Trip Setpoint, the methodology used to determine the as-found tolerance and the methodology used to determining the as-left tolerance shall be specified in the Technical Specification Bases.

For Unit 1, through Cycle 13, the ALLOWABLE VALUE for the SG Water Level High-High remains at 86% of narrow range Span .

Table 3.3.2-1 (page 5 of 6)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE(a)
6. Auxiliary Feedwater					
a. Automatic Actuation Logic and Actuation Relays (Solid State Protection System)	1, 2, 3	2 trains	G	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA
b. Not Used.					
c. SG Water Level Low-Low	1, 2, 3	4 per SG	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	NA
d. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.				
e. Loss of Offsite Power	1, 2, 3	1 per train	F	SR 3.3.2.7 SR 3.3.2.9 SR 3.3.2.10	NA
f. Not Used.					
g. Trip of all Main Feedwater Pumps	1, 2	2 per AFW pump	J	SR 3.3.2.8	NA
h. Not Used.					



except for functions 5b and 6c (the Nominal Trip Setpoint defines the limiting safety system setting for these Trip Functions)

Nominal

(continued)

- (a) The Allowable Value defines the limiting safety system settings. See the Bases for the Trip Setpoints.
- (q) If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.
- (r) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the Nominal Trip Setpoint, or a value that is more conservative than the Trip Setpoint; otherwise, the channel shall be declared inoperable. The Nominal Trip Setpoint, the methodology used to determine the as-found tolerance and the methodology used to determine the as-left tolerance shall be specified in the Technical Specification Bases.

For Unit 1, through Cycle 13, the ALLOWABLE VALUE for the SG Water Level Low-Low remains at 36% of narrow range Span.

**Enclosure to TXX-07189
Westinghouse authorization letter CAW-07-2362
with accompanying affidavit,
Proprietary Information Notice
and Copyright Notice**



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Our ref: CAW-07-2362

December 11, 2007

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WPT-17079, Attachment 1, "Response to NRC Instrumentation and Controls Branch Request for Additional Information dated November 19, 2007" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced letter is further identified in Affidavit CAW-07-2362 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Luminant Generation Company LLC.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-07-2362, and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. A. Gresham', written over a printed name.

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Enclosures

cc: J. Thompson, NRC

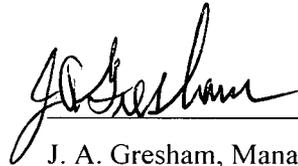
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



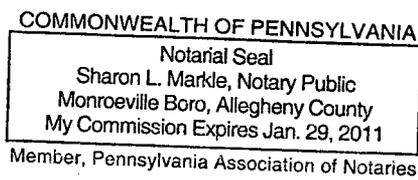
J. A. Gresham, Manager

Regulatory Compliance & Plant Licensing

Sworn to and subscribed before me
this 11th day of December, 2007



Notary Public



- (1) I am Manager, Regulatory Compliance & Plant Licensing, in Nuclear Services, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse "Application for Withholding" accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WPT-17079, Attachment 1, "Response to NRC Instrumentation and Controls Branch Request for Additional Information dated November 19, 2007" (Proprietary), for Comanche Peak Nuclear Power Plant Units 1 and 2, being transmitted by Luminant Generation Company LLC letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted for use by Westinghouse for Comanche Peak Nuclear Power Plant Units 1 and 2 is expected to be applicable for other licensee submittals in response to certain NRC requirements for justification of stretch power uprating.

This information is part of that which will enable Westinghouse to:

- (a) Provide information in support of plant power uprate licensing submittals.

- (b) Provide customer specific response to NRC requests for information.
- (c) Provide licensing support for customer submittals.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of meeting NRC requirements for licensing documentation associated with power uprate licensing submittals.
- (b) Westinghouse can sell support and defense of the technology to its customer in the licensing process.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar information and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

COPYRIGHT NOTICE

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.