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Ref. # 10CFR50.90

June 30, 2008

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) 07-004
REVISION TO THE TECHNICAL SPECIFICATIONS FOR SPENT FUEL POOL
CRITICALITY (TAC NOS. MD8417 AND MD8418)

REFERENCES: Letter logged TXX-07106 dated August 28, 2007 from Mike Blevins to the NRC submitting License Amendment Request (LAR) 07-004, proposing revisions to the Operating Licenses and to Technical Specifications 1.0, "USE AND APPLICATION" to revise rated thermal power from 3458 MWT to 3612 MWT

Dear Sir or Madam:

Per the referenced letter, Luminant Generation Company LLC (Luminant Power) requested changes to the Comanche Peak Steam Electric Station, herein referred to as Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2 Operating Licenses and to Technical Specification 1.0, "USE AND APPLICATION" to revise rated thermal power from 3458 MWT to 3612 MWT. As part of the request to increase rated thermal power, Luminant Power requested to revise Technical Specifications 3.7.17, "Spent Fuel Assembly Storage," for the spent fuel pool criticality analysis CPNPP Units 1 and 2.

Based on discussions with the NRC Staff, Luminant Power is supplementing the information supporting the spent fuel pool criticality analysis with the attached and enclosed information. The additional information provided in the attachment to this letter discusses the application of Luminant Power procedures for handling spent fuel at Comanche Peak. Enclosure 1 supplements the criticality analysis provided in the referenced letter with additional information.

Enclosure 1 contains information proprietary to Westinghouse Electric Company LLC, and is supported by an affidavit signed by Westinghouse, the owner of the information. Enclosure 2 is the non-proprietary version of Enclosure 1. The affidavit (Enclosure 3) 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 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 Enclosure 1 or the supporting Westinghouse affidavit should reference CAW-08-2451 and should be addressed to J. A. Gresham,

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

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

A001
WPR

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 supplement.

This communication contains no new commitments no new license basis commitments for 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 June 30, 2008.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

By: 
Fred W. Madden
Director, Oversight & Regulatory Affairs

Attachment - Comanche Peak Spent Fuel Pool Configuration Controls

- Enclosures
1. WCAP-16827-P, Addendum 1, 2008, "Supplement to Comanche Peak Units 1 and 2 Spent Fuel Pool Criticality Safety Analysis"
 2. WCAP-16827-NP, Addendum 1, 2008, "Supplement to Comanche Peak Units 1 and 2 Spent Fuel Pool Criticality Safety Analysis"
 3. Westinghouse authorization letter CAW-08-2451 with accompanying affidavit, Proprietary Information Notice and Copyright Notice.

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

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

Attachment

Comanche Peak Spent Fuel Pool Configuration Controls

At Comanche Peak Nuclear Power Plant (CPNPP), the Spent Fuel Pool configuration is carefully maintained to satisfy Technical Specification limitations as well as other administrative controls associated with the safe storage of spent fuel assemblies.

Procedural controls are in place to ensure that a move sequence plan is prepared, independently reviewed, and approved prior to moving any fuel or fuel component. The fuel move sequence plans are generated and independently checked by qualified Core Performance Engineers and approved by both the Core Performance Engineering Supervisor and a Fuel Handling qualified Senior Reactor Operator. Should the need arise to change the plan (including sequence order), the changes must be reviewed and approved prior to continuing fuel movement. The software which is used to generate fuel movement sequence plans is controlled under the Software Quality Assurance program, and the configuration data files are procedurally controlled to maintain accuracy and integrity of the database.

During fuel movement, a Senior Reactor Operator with a fuel handling qualification is required to verify the location of each move. An independent check is required for each location (both the "from" and "to" location). Place keeping is procedurally required for all fuel movement, which involves recording the latch and un-latch times for each assembly on the fuel move sequence plan. For in-pool fuel movement, this is adequate to ensure that a misplaced fuel assembly will not lead to additional errors on following steps. During Core Offload, initial latching of an assembly and the final unlatching are performed in separate buildings, and therefore an underwater camera is used to verify the assembly ID before being stored in the Spent Fuel Pool (SFP). Improperly identifying an assembly or location is not a factor leading to a common mode error, since the location for each step is checked independently using location markers in the SFP (a relative location to a previous move is not utilized).

Additionally, after each major fuel move campaign, procedural controls require that the final configuration be compared to maps of the expected (planned) configuration. This "pattern check" is in place both to detect miss-loading errors as well as ensure the fuel tracking database updates have been performed accurately. Also note that a 100% identification verification of each fuel assembly in the SFP was performed using underwater cameras in 2005 in response to NRC Bulletin 2005-01, and no errors in assembly or insert locations were discovered.

Both current and proposed Technical Specifications contain limitations on fuel storage in the form of defining 'configurations' of fuel (i.e. "2 of 4 storage" and "3 of 4 storage with Axial Blankets"), and limitations on boundaries between these configurations. Procedural controls will ensure that all fuel assemblies stored along an interface boundary satisfy the requirements of WCAP-16827 section 4.5.1, and that for all "2x2" arrays which contain the assembly, the storage limitations for that configuration are met.

Upon implementation of the revised criticality analysis, the limitations related to Spent Fuel Storage will be addressed administratively through procedural and software controls. The process for verifying the acceptability of a planned storage configuration will be similar to the current process. Implementation of the proposed Technical Specifications, require a period of transition involving an increased amount of fuel movement. Following the transition, it is expected that the amount of fuel movement per refueling will be approximately the same.