



**Luminant**

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CP-201000144  
Log # TXX-10019

Ref. # 10 CFR 50.90

February 1, 2010

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  
REVISION TO LICENSE AMENDMENT REQUEST 09-001,  
ADMINISTRATIVE REVISION TO OPERATING LICENSES AND TECHNICAL  
SPECIFICATIONS (TAC NOS. ME0643 AND ME0644)

**REFERENCES:** 1. Letter logged TXX-09029 dated February 11, 2009, from Rafael Flores of Luminant Power to the NRC submitting License Amendment Request (LAR) 09-001.

Dear Sir or Madam:

Per Reference 1, Luminant Generation Company LLC (Luminant Power) requested an amendment to the Comanche Peak Steam Electric Station, herein referred to as Comanche Peak Nuclear Power Plant (CPNPP), Unit 1 Operating License (NPF-87) and Unit 2 Operating License (NPF-89) to revise the CPSES Unit 1 and 2 Technical Specifications (TSs).

The proposed change revises the CPSES Unit 1 and 2 Operating Licenses (OL) and Technical Specifications (TS) to change the plant name from Comanche Peak Steam Electric Station (CPSES) to Comanche Peak Nuclear Power Plant (CPNPP), removes the Table of Contents (TOC) from the TSs and places it under licensee control, deletes TS 3.2.1.1, TS 3.2.3.1, TS 5.5.9.1, TS 5.6.10, and several footnotes from Tables 3.3.1-1 and 3.3.2-1 and TS 3.4.10 since these TS and footnotes are no longer applicable to Unit 1 or Unit 2 operation, renumbers TS 3.2.1.2 to TS 3.2.1 and TS 3.2.3.2 to TS 3.2.3 and TS 5.5.9.2 to TS 5.5.9, deletes several topical reports from the list of approved analytical methods used to determine core operating limits in TS 5.6.5, and corrects various minor editorial errors in the Technical Specifications. Due to the numerous changes proposed, this license amendment request proposes to reprint and reissue the entire CPSES Unit 1 and Unit 2 Technical Specifications.

On January 14, 2010, in a teleconference between NRC Staff and Luminant Power, NRC Staff indicated that several pages from Appendix B to the Operating Licenses, the Environmental Protection Plan (Non Radiological); also required revision to change the plant name from Comanche Peak Steam Electric Station (CPSES) to Comanche Peak Nuclear Power Plant (CPNPP).

In addition, the NRC Staff indicated that the text in TS 5.6.5b currently refers to document number 20 and that the proposed changes would result in re-numbering the document currently identified as number 20 to number 3. Consequently, Luminant Power requests that TS 5.6.5b be revised to refer to document number 3, vice number 20. In addition, two other changes have been identified affecting TS pages 3.7-8 and 3.7-35. On both these pages, the second line of the Applicability statement should be indented.

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

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

A001  
NRK

Attachment 1 provides the affected pages from Appendix B marked up to reflect the proposed changes. Attachment 2 provides the retyped Appendix B pages which incorporate the requested changes. Attachment 3 provides a retyped Technical Specification page 5.0-32 which incorporates the additional change to TS 5.6.5b.

None of these additional changes affect the conclusions of the significant hazards consideration provided in Attachment 1 of the original request submitted in reference 1.

This communication contains no new or revised commitments.

In accordance with 10 CFR 50.91(b), Luminant Power is providing the State of Texas with a copy of this supplement to the proposed license amendment.

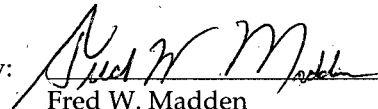
Should you have any questions, please contact Mr. Robert Slough at (254)897-5727.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 1st day of February, 2010.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

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

Attachments:      1.    Proposed Changes To Appendix B, Environmental Protection Plan (Mark-Up)  
                         2.    Retyped Appendix B, Environmental Protection Plan Pages  
                         3.    Proposed Changes to Technical Specifications (Mark-Up)

RAS

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

Alice Hamilton Rogers, P.E.  
Inspection Unit Manager  
Texas Department of State Health Services  
Mail Code 1986  
P. O. Box 149347  
Austin, TX 78714-9347

**ATTACHMENT 1 TO TXX-10019**

**PROPOSED CHANGES TO APPENDIX B,  
ENVIRONMENTAL PROTECTION PLAN  
(MARK-UP)**

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NUCLEAR POWER PLANT


APPENDIX B  
TO FACILITY OPERATING LICENSE NOS. NPF-87 & NPF-89

LUMINANT GENERATION COMPANY LLC  
COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 & 2  
DOCKET NOS. 50-445 & 50-446

ENVIRONMENTAL PROTECTION PLAN  
(NON RADIOLOGICAL)

COMANCHE PEAK STEAM-ELECTRIC STATION  
UNITS 1 & 2

ENVIRONMENTAL PROTECTION PLAN  
(NON RADIOLOGICAL.)



NUCLEAR  
POWER PLANT

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## 2.0 Environmental Protection Issues

In the FES-OL, dated September 1981, the staff considered the environmental impacts associated with the operation of the two-unit Comanche Peak Steam Electric Station (CPSES). Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

### 2.1 Aquatic Issues

The aquatic issues identified by the State in the FES-OL were as follows:

- (1) Effects of the intake structure on aquatic biota during operation (FES-OL Section 5.5.2.3).
- (2) Effects of the circulating water chlorination system on aquatic biota during operation (FES-OL Sections 4.2.4.1, 5.3.4.1, and 5.11.3.1).

The second issue above, "Effects of the circulating water chlorination system on aquatic biota during operation (FES-OL Sections 4.2.4.1, 5.3.4.1, and 5.11.3.1)," no longer applies because the TPDES permit no longer requires that such a study be performed.

Aquatic matters are addressed by the effluent limitations and monitoring requirements contained in the effective TPDES permit issued by the Texas Commission on Environmental Quality. The NRC will rely on this agency for regulation of matters involving water quality and aquatic biota.

### 2.2 Terrestrial Issues

The terrestrial issue identified by the staff in the FES-OL was as follows:

- (1) Potential impacts resulting from the use of groundwater by the station during operation (FES-OL Section 5.3.1.2).

NRC requirements with regard to the terrestrial issue are specified in Subsection 4.2 of this EPP.

#### 4.0 Environmental Conditions

##### 4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours, followed by a written report per Subsection 5.4.2. The following are examples of such events: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

##### 4.2 Environmental Monitoring



###### 4.2.1 Groundwater Levels and Station Water Use Monitoring

Groundwater levels in the onsite observation wells identified as OB-3 and OB-4 in the FES-OL (Figure 4-3) shall be monitored and recorded monthly when the groundwater pumpage rate by CPSES is less than or equal to 30 gallons per minute (gpm) and weekly when the CPSES average monthly rate exceeds 30 gpm for the previous month. Water levels shall be read and recorded on approximately the same day of the month when monitoring monthly and on the same day of the week when monitoring weekly (an aid in interpreting the results by minimizing the influence of cyclic water use patterns of the aquifer by others on the observed water levels).

A monthly record of the total number of gallons pumped from each of the onsite production wells shall be maintained, including an average monthly pumpage rate in gpm.

A monthly record showing the rate and total amount of surface water processed by the onsite water treatment facility shall be maintained by the licensee on a monthly basis. This record shall include the process rate in gallons per minute and the total amount in gallons.

The licensee shall include the results of this monitoring program as part of the Annual Operating Report (see Subsection 5.4.1).

###### 4.2.2 Water Treatment Facility Outages Impact Assessment and Reporting

The following outage of the onsite water treatment facility shall be reported to the NRC if groundwater is used to supplement the supply of treated surface water during the outage:

- (1) Routine or unplanned outages that exceed 30 consecutive days.
- (2) Any outage of at least 24 hours duration, beginning with the third such outage in a calendar year, if these outages are accompanied by an increase in the monthly average groundwater pumpage to a rate exceeding 30 gpm. When it is determined that either

**ATTACHMENT 2 TO TXX-10019**

**RETYPE APPENDIX B,  
ENVIRONMENTAL PROTECTION PLAN PAGES**

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APPENDIX B  
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LUMINANT GENERATION COMPANY LLC  
COMANCHE PEAK NUCLEAR POWER PLANT UNITS 1 & 2  
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ENVIRONMENTAL PROTECTION PLAN  
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**ATTACHMENT 3 TO TXX-10019**

**RETYPE TECHNICAL SPECIFICATION PAGES**

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3.7 PLANT SYSTEMS

3.7.3 Feedwater Isolation Valves (FIVs) and Feedwater Control Valves (FCVs) and Associated Bypass Valves

LCO 3.7.3 Four FIVs, four FCVs, and associated bypass valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3 except when FIV, FCV or associated bypass valve is either closed and de-activated or isolated by a closed manual valve.

ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each valve.  
-----

| CONDITION                       | REQUIRED ACTION                                     | COMPLETION TIME |
|---------------------------------|---|-----------------|
| A. One or more FIVs inoperable. | A.1 Close or isolate FIV.                           | 72 hours        |
|                                 | <u>AND</u><br>A.2 Verify FIV is closed or isolated. | Once per 7 days |
| B. One or more FCVs inoperable. | B.1 Close or isolate FCV.                           | 72 hours        |
|                                 | <u>AND</u><br>B.2 Verify FCV is closed or isolated. | Once per 7 days |

3.7 PLANT SYSTEMS

3.7.17 Spent Fuel Assembly Storage

LCO 3.7.17 The combination of initial enrichment, burnup and decay time of each spent fuel assembly stored in Region II racks shall be within either (1) the "acceptable" domain of Figure 3.7.17-1 in a 4 out of 4 configuration, (2) the "acceptable" domain of Figure 3.7.17-2 in a 3 out of 4 configuration, (3) the "acceptable" domain of Figure 3.7.17-3 in a 2 out of 4 configuration, or (4) shall be stored in a 1 out of 4 configuration. The acceptable storage configurations are shown in Figure 3.7.17-4.

APPLICABILITY: Whenever any fuel assembly is stored in Region II racks of the spent fuel storage pool.

ACTIONS

| CONDITION                           | REQUIRED ACTION  | COMPLETION TIME |
|-------------------------------------|--|-----------------|
| A. Requirements of the LCO not met. | A.1 -----NOTE-----<br>LCO 3.0.3 is not applicable.<br>-----<br><br>Initiate action to move the noncomplying fuel assembly to an acceptable storage location. | Immediately     |

5.6 Reporting Requirements (continued)

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5.6.5 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Moderator temperature coefficient limits for Specification 3.1.3.
  2. Shutdown Rod Insertion Limit for Specification 3.1.5.
  3. Control Rod Insertion Limits for Specification 3.1.6.
  4. AXIAL FLUX DIFFERENCE Limits and target band for Specification 3.2.3.
  5. Heat Flux Hot Channel Factor,  $K(Z)$ ,  $W(Z)$ ,  $F_Q^{RTP}$ , and the  $F_Q^C(Z)$  allowances for Specification 3.2.1.
  6. Nuclear Enthalpy Rise Hot Channel Factor Limit and the Power Factor Multiplier for Specification 3.2.2.
  7. SHUTDOWN MARGIN values in Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6 and 3.1.8.
  8. Refueling Boron Concentration limits in Specification 3.9.1.
  9. Overtemperature N-16 Trip Setpoint in Specification 3.3.1.
  10. Reactor Coolant System pressure, temperature, and flow in Specification 3.4.1.
  11. Reactor Core Safety Limit (Safety Limit 2.1.1).
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC. When an initial assumed power level of 102 percent of rated power is specified in a previously approved method, 100.6 percent of rated power may be used only when feedwater flow measurement (used as input for reactor thermal power measurement) is provided by the leading edge flowmeter (LEFM $\sqrt{}$ ) as described in document number 3 listed below. When feedwater flow measurements from the LEFM $\sqrt{}$  are not available, the originally approved initial power level of 102 percent of rated thermal power shall be used.