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CP-201400231
TXX-14029

Ref. # 10CFR50.90

February 19, 2014

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)
DOCKET NOS. 50-445 AND 50-446
SUPPLEMENT TO LICENSE AMENDMENT REQUEST 13-002
REVISION TO APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-510, "REVISION TO STEAM GENERATOR PROGRAM INSPECTION FREQUENCIES AND TUBE SAMPLE SELECTION," USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (TAC NOS. MF2433 AND MF2434)

REFERENCE:
1. Letter logged TXX-13132, dated August 29 , 2013, regarding License Amendment Request 13-002, from Luminant Power to the NRC
2. Email dated February 15, 2014, from the NRC regarding corrections to License Amendment Request (LAR) 13-002 to Adopt TSTF-510

Dear Sir:

Pursuant to 10CFR50.90, Luminant Generation Company LLC (Luminant Power) requested an amendment to the CPNPP Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89) by incorporating the changes into the CPNPP Unit 1 and 2 Technical Specifications (TSs) (Reference 1).

The proposed amendment would modify TS requirements regarding steam generator tube inspections and reporting as described in TSTF-510-A, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection."

This submittal supplements Reference 1 by incorporating the corrections discussed in Reference 2 into License Amendment Request (LAR) 13-002. Specifically, pages 5.5-7 and 5.6-5 read "plugging [or repair] criteria" but should only read "plugging criteria". The second discrepancy deals with a formatting requirement in the header on Page 5.5-15. The corrected pages are in the attachment to this letter. Pages 5.5-7, 5.6-5, and 5.5-15 of Attachment 3 to TXX-13132 should be replaced with the attached new pages which contain the corrections as described above. The corrections do not result in any changes to the Significant Hazards Consideration Determination previously submitted in Reference 1.

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

A001
NRR

Designated Original per Balwant Singal
2/20/2014 Lead PM

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

Should you have any questions, please contact Mr. Jack Hicks at (254)897-6725.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 19th of February, 2014.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: Fred W. Madden
Fred W. Madden
Director, External Affairs

Attachment – Corrected Retyped Technical Specification Pages

c - Marc L. Dapas, Region IV
Balwant K. Singal, NRR
Resident Inspectors, Comanche Peak

Robert Free
Texas Department of State Health Services
Austin, TX 78714-9347

ATTACHMENT TO TXX-14029

CORRECTED RETYPED

TECHNICAL SPECIFICATION PAGES

Page 5.5-7

Page 5.5-15

Page 5.6-5

5.5.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator (SG) Program (continued)

inspection period as defined in a, b, and c below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the inspection period after the determination that a new form of degradation could potentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion of the included SG inspection outage.

a. After the first refueling outage following SG installation, inspect 100% of the tubes during the next 120 effective full power months. This constitutes the first inspection period;

b. During the next 96 effective full power months, inspect 100% of the tubes. This constitutes the second inspection period; and

c. During the remaining life of the SGs, inspect 100% of the tubes every 72 effective full power months. This constitutes the third and subsequent inspection periods.

3. For the Unit 1 model Delta-76 steam generators (Alloy 690 thermally treated) after the first refueling outage following SG installation, inspect each SG at least every 72 effective full power months or at least every third refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, c and d below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the

5.5 Programs and Manuals

5.5.16 Containment Leakage Rate Testing Program (continued)

b. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 48.3 psig.

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

d. Leakage rate acceptance criteria are:

1. Containment leakage rate acceptance criteria is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for Type A tests;

2. Air lock testing acceptance criteria are:

i. Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

ii. For each door, leakage rate is $\leq 0.01\ L_a$ when pressurized to $\geq P_a$.

e. The provision of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program, with the exception of the containment ventilation isolation valves.

f. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

5.5.17 Technical Requirements Manual (TRM)

The TRM contains selected requirements which do not meet the criteria for inclusion in the Technical Specification but are important to the operation of CPNPP. Much of the information in the TRM was relocated from the TS.

Changes to the TRM shall be made under appropriate administrative controls and reviews. Changes may be made to the TRM without prior NRC approval provided the changes do not require either a change to the TS or NRC approval pursuant to 10 CFR 50.59. TRM changes require approval of the Plant Manager.

5.5.18 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for

5.6 Reporting Requirements

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

1. WCAP-14040-NP-A; "Methodology used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves."

c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6.7 Not used

5.6.8 PAM Report

When a report is required by the required actions of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, Steam Generator (SG) Program. The report shall include:

a. The scope of inspections performed on each SG,

b. Degradation mechanisms found,

c. Nondestructive examination techniques utilized for each degradation mechanism,

d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,

e. Number of tubes plugged during the inspection outage for each degradation mechanism,

f. The number and precentage of tubes plugged to date, and the effective plugging percentage in each steam generator,

g. The results of condition monitoring, including the results of tube pulls and in-situ testing,

h. For Unit 2, the primary to secondary leakage rate observed in each SG (if it is not practical to assign the leakage to an individual SG, the entire primary to