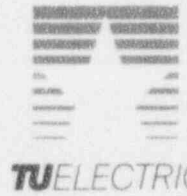

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Ref. # 10CFR50.90
10CFR50.36a

William J. Cahill, Jr.
Group Vice President

February 14, 1994

U. S. Nuclear Regulatory Commission
Attn: Document Control Room
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
SUBMITTAL OF LICENSE AMENDMENT REQUEST 94-003
CHANGE FREQUENCY OF REPORTS FOR
RADIOLOGICAL EFFLUENTS

Gentlemen:

Pursuant to 10CFR50.90, TU Electric hereby requests an amendment to the CPSES Unit 1 facility operating license (NPF-87) and CPSES Unit 2 facility operating license (NPF-89) by incorporating the attached changes into the CPSES Units 1 and 2 Technical Specifications. The purpose of this request is to change the frequency and due date of reports for radiological effluents from "semiannual" to "annual" and from "within 60 days after January 1 and July 1" to "prior to May 1", respectively.

TU Electric has prepared the proposed changes to be consistent with 10CFR50.36a and requests that these proposed changes be incorporated into the Technical Specifications as described in the attachments of this submittal. Attachment 1 is an affidavit; Attachment 2 provides a detailed description and assessment of the proposed changes; Attachment 3 provides the proposed changes to the Technical Specifications.

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

TU Electric requests that the proposed changes to the Technical Specifications be approved by June 15, 1994. Upon approval of the proposed changes; TU Electric requests a 30 day implementation period following the date of license amendment issuance.

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Should you have any questions, please contact Mr. Connie L. Wilkerson at (214) 812-8819.

Sincerely,

William J. Cahill, Jr.

CLW/grp
Attachments:
1. Affidavit
2. Description and Assessment
3. Affected Technical Specification pages (NUREG-1468) as revised by all approved license amendments

c - Mr. L. J. Callan, Region IV
Mr. L. A. Yandell, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR

Mr. D. K. Lacker
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Texas Utilities Electric Company	)	Docket Nos. 50-445
	)	and 50-446
(Comanche Peak Steam Electric	)	License Nos. NPF-87
Station, Unit 1 & 2)	)	NPF-89

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear Production for TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 94-003; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF SOMERVELL)

Subscribed and sworn to before me, on this 14th day of February, 1994.

Patricia Wilson
Notary Public

PATRICIA WILSON
MY COMMISSION EXPIRES
March 16, 1997

DESCRIPTION AND ASSESSMENT

I. BACKGROUND

The final rule for reducing the regulatory burden on nuclear licensees was published in the Federal Register, Volume 57, No. 169 on August 31, 1992. This proposed amendment is consistent with the rule for reporting radioactive effluent release specified in 10CFR50.36a.

II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

This proposed license amendment changes the requirements for the submission of the CPSES Radioactive Effluent Release Report from "semiannually" to "annually" and the report due date from "60 days after January 1 and July 1" to "prior to May 1", respectively. Attachment 3 contains the proposed revised Technical Specification pages.

III. ANALYSIS

This proposed license amendment conforms to 10CFR50.36a which allows for changing the frequency of submitting the Radioactive Effluent Release Report. No changes are proposed as part of this submittal that would change the method or frequency of measuring radioactive effluents or the methodology of calculating offsite dose to the public. The proposed amendment changes the reporting frequency requirements to be consistent with amended federal regulations.

The proposed amendment also changes the subject report submittal due date to allow a more reasonable time period for preparing the Annual Radioactive Effluent Release Report. This change is consistent with the model Technical Specification proposed in the recent NRC Draft Generic Letter (GL), "Guidance for Modification of Technical Specifications to reflect (A) Revisions to 10 CFR Part 20, 'Standards for Protection Against Radiation' and 10 CFR 50.36a, 'Technical Specifications on Effluents from Nuclear Power Reactors', (B) Related Current Industry Initiatives, and (C) Miscellaneous Related Editorial Clarification."

These changes do not reduce protection to the health and safety of the public.

IV. SIGNIFICANT HAZARDS CONSIDERATIONS ANALYSIS

TU Electric has evaluated whether or not a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10CFR50.92(c) as discussed below:

Does the proposed change:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The amendment involves only changes of reporting frequency and due date requirements for radiological effluent release reporting. These changes are administrative in nature and do not affect safe operation of the plant; therefore, accident probabilities or consequences are unaffected.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment is administrative in nature and does not involve any changes to plant design or configuration. For this reason, it will not create the possibility of a new or different kind of accident.

3) Involve a significant reduction in a margin of safety?

The proposed amendment does not involve a significant reduction in margin of safety. The proposed amendment only changes the reporting frequency and due date requirements for radiological effluent release reporting. The reporting requirements for radiological effluent releases are administrative changes; therefore, there is not a significant reduction in the margin of safety.

Based upon the results of the above evaluation, TU Electric concludes that the proposed change does not involve a significant hazards consideration.

V. ENVIRONMENTAL EVALUATION

The proposed changes to the CPSES Technical Specification have been reviewed against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration; nor increase the types and amounts of effluents that may be released offsite; nor increase the individual or cumulative occupational radiation exposures. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9); therefore, pursuant to 10CFR51.22(b), an environmental assessment of the proposed change is not required.

VI. REFERENCES

1. NRC Draft Generic Letter (GL), "Guidance for Modification of Technical Specifications to Reflect (A) Revisions to 10 CFR Part 20, 'Standards for Protection Against Radiation' and 10 CFR 50.36a, 'Technical Specification on Effluents from Nuclear Power Reactors', (B) Related Current Industry Initiatives, and (C) Miscellaneous Related Editorial Clarification." FR 58:68170; December 23, 1993.