TUELECTRIC

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10CFR50.36

William J. Cahill, Jr.
Group Vice President

March 28, 1994

U. S. Nuclear Regulatory Commission (NRC)
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
SUBMITTAL OF LICENSE AMENDMENT REQUEST 94-008
ADDITION OF STEAMLINE BREAK TOPICAL REPORT
TO TECHNICAL SPECIFICATION SECTION 6.9.1.6b

Gentlemen:

Pursuant to 10CFR50.90, TU Electric hereby requests an amendment to the CPSES Unit 1 and Unit 2 Operating Licenses (NPF-87 and NPF-89) by incorporating the attached changes into the CPSES Units 1 and 2 Technical Specifications.

The proposed changes revise the CPSES Units 1 and 2 Technical Specifications by updating Section 6.9.1.6b to add NRC approved CPSES topical report RXE-91-005 (steamline break methodology) and to delete WCAP-9220-P-A (Westinghouse Emergency Core Cooling System (ECCS) evaluation model for Unit 1).

Attachment 2 provides a detailed description of the proposed changes, a safety analysis of the changes, and TU Electric's determination that the proposed changes do not involve a significant hazard consideration. Attachment 3 provides the affected technical specification pages (NUREG-1468), marked-up to reflect proposed changes.

TU Electric plans to have the steamline break analysis methodology available for the analysis of the second fuel cycle (Cycle 2) for Unit 2. Cycle 2 begins following Unit 2's first refueling outage in the Fall of 1994. TU Electric requests approval of this proposed license amendment by October 1, 1994, with implementation of the Technical Specification change to occur prior to entry into MODE 3 during the startup of Unit 2 following its refueling outage.

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400 N. Olive Street L.B. 81 Dallas, Texas 75201

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

If there are any questions, please contact Mr. Bob Dacko at (214) 812-8228.

Sincerely,

William J. Cahill

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

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

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

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
	)	50-446
(Comanche Peak Steam Electric Station, Units 1 & 2)	)	License Nos. NPF-87
	)	NPF-89

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear for TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 94-008; 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 DALLAS)

Subscribed and sworn to before me, on this 28th day of March, 1994.

Notary Public

NOTARY PUBLIC
STATE OF TEXAS
Gayle R. Peck
Notary Public, State of Texas
My Comm. Expires 01/06/98

DESCRIPTION AND ASSESSMENT

I. BACKGROUND

TU Electric has developed analytical methods to determine core operating limits for CPSES Units 1 and 2 reload cycles. In order for TU Electric to use these methods for future reload cycles, the reports which describe the methods must be added to Technical Specification (TS) Section 6.9.1.6b. TS 6.9.1.6b lists references which contain analytical methods approved by the NRC for the determination of core operating limits. The NRC recently approved TU Electric Topical Report RXE-91-005, "Methodology for Reactor Core Response to Steamline Break Events," (Reference 1). The proposed administrative change adds this topical report to TS 6.9.1.6b.

II. DESCRIPTION OF TECHNICAL SPECIFICATIONS CHANGE REQUEST

The proposed changes revise TS Section 6.9.1.6b by deleting the existing Reference 17), WCAP-9220-P-A, "WESTINGHOUSE ECCS EVALUATION MODEL, February 1978 Version" which applied to Unit 1 only, and adding a new Reference 17) RXE-91-005, "Methodology for Reactor Core Response to Steamline Break Events," which applies to both Units 1 and 2.

III. ANALYSIS

TU Electric has developed analytical methods for the determination of core operating limits. Operations within these limits assure that all applicable limits of the safety analysis are met. TU Electric Topical Report RXE-91-005 contains the methodology to confirm that all applicable safety limits are met for steamline break events. This report has been approved by the NRC for both CPSES Units 1 and 2, subject to the constraints of the associated NRC Safety Evaluation (enclosure to Reference 1). The addition of this topical report to TS 6.9.1.6b will authorize its use for CPSES Units 1 and 2 reload cycles.

Beginning with the fourth fuel cycle for Unit 1, which commenced in December of 1993, the Unit 1 large break LOCA analyses are being performed using the TU Electric methodology already referenced in TS Section 6.9.1.6b. The Westinghouse ECCS evaluation model report (WCAP-9220-P-A), which had been used to analyze large break loss of coolant accidents (LOCAs) for Unit 1 prior to the fourth fuel cycle, is no longer necessary and is being deleted by the proposed change. The large break LOCA analyses methodology for Unit 2 continue to be performed using the analytical methods contained in the Westinghouse reports listed.

IV. SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TU Electric has evaluated the significant hazards consideration involved with the proposed change by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

Does the proposed change:

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

   The NRC assures that appropriate core operating limits are established by requiring that they be determined using NRC approved analytical methods. These approved methods are described in the documents listed in TS Section 6.9.1.6b. TU Electric has developed the analysis capability to evaluate the core operating limits. The methodologies used by TU Electric have been documented in a series of TU Electric submittals which were reviewed and approved by the NRC. This TS revision adds the topical report which describes the TU Electric steamline break analysis methodology to TS Section 6.9.1.6b.

   Also, the Westinghouse report which describes the methodology previously used in the analysis of Unit 1 large break LOCAs is no longer used and is being deleted. Large break LOCA analyses for Unit 1 are now performed using NRC approved TU Electric methodology.

   Because the revisions are administrative only, they cannot directly affect the probability or the consequences of any previously evaluated accident. The steamline break analysis methodology is part of a group methodologies which are authorized by the technical specifications to be used to verify that each reload cycle continues to satisfy the core operating limits. The core operating limits are set to assure that relevant plant parameters are maintained such that potential accidents are within the bounds of the accident analyses. Because the applicable limits of the safety analyses will be verified to be satisfied using authorized methodologies, there is no significant impact on the consequences of an accident previously evaluated. In addition, since the core operating limits do not affect any accident initiators, the change has no impact on the probability of any accident previously analyzed.

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

   The proposed changes involve a change in the permissible analysis methodologies for determining core operating limits. As such, the changes play an important role in the analysis of postulated accidents but none of the changes affect plant hardware or the operation of plant systems in a way that could initiate an accident. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in the margin of safety?

   In reviewing and approving the methods used for safety analyses, the NRC has approved the safety analysis limits which establish the margin of safety to be maintained. Satisfaction of event-specific acceptance criteria ensures that the approved safety analysis limits are met and thus provides the margin of safety. The methodology being added to the TS demonstrates, in a conservative manner, that the event acceptance criteria are satisfied. Therefore, including this method in the TS does not change the margin of safety.

Based on the above evaluations, TU Electric concludes that the activities associated with the proposed changes satisfy the no significant hazards consideration standards of 10CFR50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

V. ENVIRONMENTAL EVALUATION

TU Electric has evaluated the proposed changes and has determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amount of any effluent that may be released off-site, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

VI. REFERENCES

1. NRC letter from Thomas A. Bergman to Mr. William J. Cahill, Jr., dated December 30, 1993