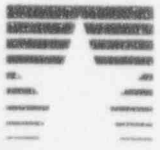

Log # TXX-96008
File # 10010, 916 (3/4.6)
Ref. # 10CFR50.90
10CFR50.36

March 12, 1996

C. Lance Terry
Group Vice President

U. S. Nuclear Regulatory Commission
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 96-002
CONTAINMENT LEAKAGE TESTING BASED ON 10 CFR 50, APPENDIX J AND
REGULATORY GUIDE 1.163, REVISION 0.

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 (TS). The purpose of this request is to incorporate changes into TS 3/4.6.1 and to add Specification 6.8.3g to implement the new Containment Leakage Rate Testing Program as required by 10CFR50 appendix J, Option B. Implementation of the new performance based leakage rate testing program will be based on the guidance provided by Regulatory Guide 1.163, September 1995. These changes are equally applicable to CPSES Units 1 and 2. This request is based upon the License Amendment issued to Pacific Gas and Electric Company and is being submitted in parallel with License Amendment Requests (LARs) from Union Electric Company and Wolf Creek Nuclear Operating Corporation.

Attachment 1 is the required affidavit. 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, marked-up to reflect the proposed changes.

TU Electric believes this request should be considered a cost beneficial licensing action in accordance with NRC Administrative Letter 95-02. In order to provide for orderly preparation for upcoming outages, TU Electric requests approval of this LAR and issuance of the license amendment by June 1, 1996. TU Electric requests an implementation period of 60 days after NRC issuance of the license amendment.

In accordance with 10 CFR 50.91(b), TU Electric is providing the State of Texas with a copy of this proposed amendment.

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Should you have any questions, please contact Ray Adams at (214) 812-8826.

Sincerely,

C. L. Terry

RJA:rja
Attachments: 1. Affidavit
2. Description and Assessment
3. Affected Technical Specification pages as revised by all approved license amendments

cc - Mr. L. J. Callan Region IV
Mr. W. D. Johnson Region IV
Mr. Tim Polich NRR
Resident Inspectors CPSES

Mr. Arthur C. Tate
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 Station, Unit 1 & 2)	)	
	)	

AFFIDAVIT

C. L. Terry being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear Production of TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 96-002; 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.

C. L. Terry
Group Vice President, Nuclear Production

STATE OF TEXAS)
)
COUNTY OF Somervell)

Subscribed and sworn to before me, on this 12th day of March, 1996.

Susan C. Gravatt
Notary Public

SUSAN C. GRAVATT
NOTARY PUBLIC
STATE OF TEXAS
Commission Expires 3-24-97

ATTACHMENT 2 TO TXX-96008

DESCRIPTION AND ASSESSMENT

DESCRIPTION AND ASSESSMENT

I. BACKGROUND

On September 26, 1995, a revision to 10CFR50, Appendix J, was issued by the Commission in the Federal Register, Volume 60, No 186. The revision established Option B - Performance-Based Requirements for conducting Integrated Leak Rate Tests (ILRTs) and Local Leak Rate Tests (LLRTs). The Commission also issued Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," that endorses, with exceptions, NEI 94-01, Rev.0, "Industry Guideline for Implementing Performance-Based Option of 10CFR Part 50, Appendix J."

The NRC Staff issued the revised 10CFR50, Appendix J, as part of the initiative to eliminate requirements that are marginal to safety. This effort is discussed in SECY-94-036, "Staff Plans for Revising 10CFR50, Appendix J, 'Containment Leakage Testing,' and for Handling Exemption Requests," dated February 17, 1994; and SECY-94-090, "Institutionalization of Continuing Program for Regulatory Improvement," dated March 31, 1994.

Appendix J, as revised by Option B, establishes new performance based requirements and criteria for periodic leakage-rate testing. With Option B, the schedule requirements for Type A Integrated Leak Rate Tests (ILRT) and for Type B and C Local Leak Rate Tests (LLRT) will be based on results of past testing. NEI 94-01 was developed to implement the proposed Option B and the justification for extending test intervals for ILRTs and LLRTs is based on performance history and risk insights. Regulatory Guide 1.163, which endorses NEI 94-01 with exceptions, provides specific guidance concerning a performance based leakage test program, acceptable leakage-rate test methods, procedures and analyses that may be used to implement the requirements and criteria of Option B. The new Containment Leakage Rate Testing Program would implement the performance based testing of Option B of 10CFR50, Appendix J.

These changes are based on the referenced revision to 10CFR50, Appendix J, and, as such, are not included in NUREG-1431, Revision 1, "Standard Technical Specifications for Westinghouse Plants." These changes were developed per the NRC's model as provided in reference 6.

II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

This license amendment request (LAR) would revise Technical Specifications (TS) 3/4.6.1.1, "Containment Integrity," 3/4.6.1.2, "Containment Leakage," 3/4.6.1.3, "Containment Air Locks," and 3/4.6.1.6, "Containment Structural Integrity" and add Specification 6.8.3g, "Containment Leakage Rate Testing Program," to implement the new performance based leakage rate testing program as permitted by 10CFR50, Appendix J, rather than paraphrasing the

requirements of the existing regulation. These changes will support the implementation of the performance based testing of Option B to Appendix J, for Type A, B, and C containment leak testing and the appropriate rescheduling of testing.

The specific changes are described below:

(3.6.1.1) Surveillance on type B testing (other than the air locks) is deleted as this testing is now addressed by Specification 3.6.1.2:

(3.6.1.2) Leak test frequency and acceptance criteria for type A, B and C testing are replaced by a reference to the Containment Leakage Rate Testing Program;

(3.6.1.2) The action for exceeding the overall integrated containment leakage rate criteria (L_a), in lieu of entering Specification 3.0.3, is added to be consistent with the Nuclear Energy Institute (NEI) model - see reference 6 (although the acual requirements remain the same);

(3.6.1.3) Leak test frequency and acceptance criteria for the air locks are replaced by a reference to the Containment Leakage Rate Testing Program;

(3.6.1.6) Containment inspection frequency is replaced with a reference to the Containment Leakage Rate Testing Program;

(BASES 3/4.6.1.2) Revised the Bases to reflect the changes made to the specifications and the addition of the Containment Leakage Rate Testing Program; and

(6.8.3g.) Added the requirements for the Containment Leakage Rate Testing Program which includes the leak test acceptance criteria previously included in other specifications, containment inspection frequencies as allowed by Regulatory Guide 1.163 and new initial and extended leak test frequencies as allowed by 10CFR50, Appendix J, Option B and in accordance with Regulatory Guide 1.163.

The NRC has issued a license amendment to partially implement Option B for Type B and C testing to Georgia Power Company for Vogtle Electric Generating Plant. The NRC has also issued a license amendment to fully implement Option B to the Pacific Gas & Electric Company for it's Diablo Canyon Power Plant. A request to fully implement Option B has been submitted by the Union Electric Company for it's Callaway Plant and by Wolf Creek Nuclear Operating Corporation.

Changes to the TS are noted in the marked up copies of the applicable TS pages provided in Attachment 3.

III. ANALYSIS

The purpose of Appendix J leak test requirements, as stated in the Introduction to 10 CFR 50 Appendix J, is to:

> "assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment."

The proposed changes to the TS and the addition of Specification 6.8.3g would revise or support the revision of the TS to implement the new performance based leakage rate testing verses paraphrasing Appendix J as is done in the current TS. There are no changes to the test type, test methodologies or test acceptance criteria, only the required frequency of tests would be affected. The frequency for containment inspections is essentially unchanged; therefore there is no impact on safety. The new initial leak rate test frequencies are based on industry experience and the extended test frequencies are performance based. These changes have been accepted by the NRC for use by light-water-cooled nuclear power plants through the approval of 10CFR50, Appendix J Option B and Regulatory Guide 1.163. The new initial test frequencies and the methodology for extending the test frequencies has been assessed by TU Electric and TU Electric concludes that the changes will provided the required assurance containment leakage will not exceed the values assumed in the associated accident analyses. These changes are being submitted to allow TU Electric to implement revisions to Appendix J. Implementation of Option B will result in significant dollar and radiation exposure savings since unnecessary testing can be eliminated.

The adoption of Option B of Appendix J will have an impact on the schedule of the Unit 2 Type A test. According to the NEI guideline referenced by Regulatory Guide 1.163, the second consecutive Type A test shall occur within 48 months of the initial pre-operational test. The original type A test described in Option A of Appendix J for Unit 2 of Comanche Peak is due 40 months +/- 10 months from the Unit 2 commercial declaration, which would be 10/8/97. Under our current schedule this would coincide with Unit 2's third refueling outage. Unit 2's second refueling outage is currently in progress with completion expected in April and Type A testing has not been scheduled for this outage. In order to adopt Option B for both units and prevent an immediate violation from occurring, it is TU Electric's intent to invoke the 15 month extension described in the NEI Guideline to accommodate the existing Unit 2 refueling schedule and Type A

testing schedule and meet the performance requirements of Option B for the unit. TU Electric feels the adoption of Option B in this manner is proper and will prevent any hastened expenditure of resources or inappropriate and costly schedule changes to the refueling outage schedule to meet the new Option B requirements. The pre-operational test for Unit 2 was completed on September 15, 1992. Applying the 48 month initial test interval and the 15 month extension yields a due date of December 15, 1997. The end result is that the test will be performed during the same outage as presently scheduled and thus there is no impact on safety.

IV. SIGNIFICANT HAZARDS CONSIDERATIONS DETERMINATION

An evaluation of the proposed Technical Specification change has been performed in accordance with 10 CFR 50.91(a)(1) regarding no significant hazards considerations using the standards in 10 CFR 50.92(c). A discussion of these standards as they relate to this amendment request follows:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

   The proposed changes to the TS and the addition of Specification 6.8.3g to implement the new performance based Containment Leakage Rate Testing Program, have no effect on plant operation. The proposed changes only provide mechanisms within the TS for implementing a performance based methodology for determining the frequency of leak rate testing which has been approved by the Commission. The test type and test method used for testing would not be changed. The test acceptance criteria would not be changed and containment leakage will continue to be maintained within the required limits.

   Directly referencing the Containment Leakage Rate Testing Program for containment ILRT and LLRT requirements does not involve any modification to plant equipment or affect the operation or design basis of the containment. Leakage rate testing is not a precursor to or an initiating event for any accident.

   Therefore, the proposed changes do <u>not</u> involve a significant increase in the probability or consequences of any accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

   The proposed changes only allow for the implementation of Option B testing frequencies and do not involve any modifications to any plant equipment or affect the operation or design basis of the

containment. The proposed changes do not affect the response of the containment during a design basis accident.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

The proposed changes do not adversely affect a Safety Limit, Limiting Condition for Operation (LCO) or plant operations. These changes only implement the allowed Option B testing frequencies that have been determined by the Commission not to involve a safety concern. The testing method, acceptance criteria and bases are not changed and still provide assurance that the containment will provide its intended function.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusion:

On the basis of the above evaluations, TU Electric concludes that the proposed changes satisfy the no significant hazards consideration standards of 10CFR50.92(c) and do not involve a significant hazards consideration.

V. ENVIRONMENTAL EVALUATION

TU Electric has evaluated the requested 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 amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the requested changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the requested change is not required.

VI. REFERENCES

1. NUREG-1431, Revision 1, "Improved Standard Technical Specifications - Westinghouse Plants", April 1995.

2. NEI 94-01, Revision 0, "Industry Guideline For Implementing Performance - Based Option Of 10 CFR Part 50, Appendix J"

3. Regulatory Guide 1.163 (September 1995), "Performance - Based Containment Leak-Test Program"

4. NUREG-1493, "Performance-Based Containment Leak-Test Program"

5. ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements"

6. NRC letter from Christopher I. Grimes to David J. Modeen (NEI) dated November 2, 1995, concerning proposed technical specifications for implementing Option B of Appendix J.