

Log # TXX-98223  
File # 10010  
916  
Ref. # 10 CFR 50.90  
10 CFR 50.36

**C. Lance Terry**  
*Senior Vice President  
& Principal Nuclear Officer*

October 21, 1998

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  
TECHNICAL SPECIFICATION CONVERSION APPLICATION  
ADDITIONAL INFORMATION FOR SECTION 3.7**

- REF: 1) TU Electric letter, logged TXX-97105, from C. L. Terry to the NRC dated May 15, 1997
- 2) NRC letter from T. A. Polich to C. L. Terry dated August 14, 1998, concerning section 3.7

Gentlemen:

TU Electric requested an amendment to the CPSES Unit 1 facility operating license (NPF-87) and Unit 2 facility operating license (NPF-89) by incorporating changes to the CPSES Units 1 and 2 Technical Specifications (TS) as provided in reference 1. The NRC staff requested additional information regarding Section 3.7, "Plant Systems," of the proposed TS changes in reference 2. The requested information is provided in the attachment to this letter as are any additional changes needed for Sections 3.7 as identified by TU Electric.

This letter and the attachment are not a supplement to reference 1. A supplement to reference 1 will be provided at a later date. Any deviations from the responses provided in this letter will be discussed in the supplement.

The only commitment contained in this letter is to provide a supplement to reference 1 at a later date.

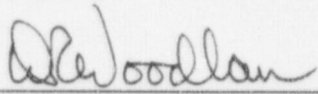
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D029

If you have any questions concerning the content of this letter, please contact Mr. Bob Dacko (254-897-0122).

Sincerely,

C. L. Terry

By:   
D. R. Woodlan  
Docket Licensing Manager

BSD/bd  
Attachment 1. Section 3.7, "Plant Systems"

- c- E. W. Merschoff, Region IV
- J. I. Tapia, Region IV
- Resident Inspectors, CPSES
- T. J. Polich, NRR
- J. N. Donohew, NRR

Mr. Arthur C. Tate  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49<sup>th</sup> Street  
Austin, Texas 78704

**JLS CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS**

**CTS 3/4.7 - PLANT SYSTEMS**

**ITS 3.7 - PLANT SYSTEMS**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND LICENSEE INITIATED  
ADDITIONAL CHANGES**

## INDEX OF ADDITIONAL INFORMATION

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.G-1	DC, CP, WC, CA	YES
3.7.1-1	DC, CP, WC, CA	YES
3.7.1-2	CP	YES
3.7.1-3	DC	NA
3.7.1-4	DC, CP, WC, CA	YES
3.7.1-5	DC, CP, WC, CA	YES
3.7.1-6	WC	NA
3.7.1-7	DC, CP, WC, CA	YES
3.7.1-8	WC, CA	NA
3.7.1-9	DC	NA
3.7.1-10	DC	NA
3.7.2-1	CP, WC, CA	YES
3.7.2-2	WC, CA	NA
3.7.2-3	DC, CP, WC, CA	YES
3.7.2-4	CP	YES
3.7.3-1	DC	NA
3.7.3-2	CP	YES
3.7.3-3	DC, CP, WC, CA	YES
3.7.3-4	WC, CA	NA
3.7.3-5	DC	NA
3.7.3-6	CP	YES
3.7.4-1	DC, CP	YES
3.7.4-2	DC	NA
3.7.4-3	DC	NA
3.7.4-4	WC, CA	NA
3.7.4-5	CP, WC, CA	YES
3.7.4-6	CP, CA	YES
3.7.4-7	CP, WC, CA	YES
3.7.4-8	CP	YES
3.7.4-9	CP	YES
3.7.5-1	CP	YES
3.7.5-2	WC, CA	NA
3.7.5-3	CA	NA
3.7.5-4	WC, CA	NA
3.7.5-5	CP	YES
3.7.5-6	CP, WC, CA	YES
3.7.5-7	CP, WC, CA	YES
3.7.5-8	DC, CP	YES
3.7.5-9	DC, CP, WC, CA	YES
3.7.5-10	DC, CP	YES
3.7.5-11	DC	NA

**INDEX OF ADDITIONAL INFORMATION  
(cont)**

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.5-12	DC	NA
3.7.6-1	WC	NA
3.7.6-2	CP, WC, CA	YES
3.7.6-3	CP	YES
3.7.6-4	WC, CA	NA
3.7.6-5	CP	YES
3.7.6-6	CA	NA
3.7.6-7	DC	NA
3.7.7-1	WC, CA	NA
3.7.7-2	DC, CP, WC, CA	YES
3.7.7-3	WC, CA	NA
3.7.7-4	CP	YES
3.7.7-5	DC	NA
3.7.7-6	DC	NA
3.7.8-1	CP	YES
3.7.8-2	CP	YES
3.7.8-3	CP	YES
3.7.8-4	CP	YES
3.7.8-5	CP	YES
3.7.8-6	DC	NA
3.7.8-7	DC	NA
3.7.8-8	DC	NA
3.7.8-9	DC	NA
3.7.8-10	DC	NA
3.7.8-11	WC, CA	NA
3.7.8-12	WC, CA	NA
3.7.8-13	WC	NA
3.7.8-14	WC, CA	NA
3.7.8-15	WC, CA	NA
3.7.8-16	CA	NA
3.7.8-17	CA	NA
3.7.9-1	DC	NA
3.7.9-2	DC	NA
3.7.9-3	CP	YES
3.7.9-4	CP	YES
3.7.9-5	WC	NA
3.7.9-6	CA	NA
3.7.9-7	CA	NA
3.7.9-8	CA	NA
3.7.10-1	DC	NA
3.7.10-2	DC	NA

**INDEX OF ADDITIONAL INFORMATION  
(cont)**

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.10-3	DC	NA
3.7.10-4	DC, WC, CA	NA
3.7.10-5	DC	NA
3.7.10-6	DC	NA
3.7.10-7	DC, WC, CA	NA
3.7.10-8	DC, WC, CA	NA
3.7.10-9	DC, CP, WC, CA	YES
3.7.10-10	DC	NA
3.7.10-11	CP	YES
3.7.10-12	DC	NA
3.7.10-13	CA	NA
3.7.10-14	CP, WC, CA	YES
3.7.10-15	WC, CA	NA
3.7.10-16	WC, CA	NA
3.7.10-17	WC, CA	NA
3.7.10-18	DC, WC, CA	NA
3.7.10-19	CP, WC, CA	YES
3.7.11-1	CP	YES
3.7.12.1-1	CP	YES
3.7.12.1-2	CP	YES
3.7.12.1-3	CP	YES
3.7.12.1-4	CP	YES
3.7.12.1-5	CP	YES
3.7.12.1-6	CP	YES
3.7.13.1-1	DC	NA
3.7.13.1-2	DC	NA
3.7.13.1-3	DC	NA
3.7.13.1-4	DC	NA
3.7.13.1-5	DC	NA
3.7.13.1-6	DC	NA
3.7.13.1-7	DC	NA
3.7.13.1-8	DC	NA
3.7.13.2-1	WC, CA	NA
3.7.13.2-2	WC, CA	NA
3.7.13.2-3	WC, CA	NA
3.7.13.2-4	WC, CA	NA
3.7.13.2-5	CA	NA
3.7.13.2-7	WC, CA	NA
3.7.13.2-8	WC, CA	NA
3.7.13.2-9	WC, CA	NA
3.7.13.2-10	WC, CA	NA

INDEX OF ADDITIONAL INFORMATION  
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
3.7.15-1	DC, CP, WC, CA	YES
3.7.15-2	WC, CA	NA
3.7.15-3	CP	YES
3.7.16-1	DC	NA
3.7.16-2	DC	NA
3.7.16-3	CP, WC, CA	YES
3.7.17.1-1	WC, CA	NA
3.7.17.1-2	CP, WC, CA	YES
3.7.17.1-3	WC, CA	NA
3.7.17.1-4	WC, CA	NA
3.7.17.1-5	WC, CA	NA
3.7.17.1-6	WC, CA	NA
3.7.17.1-7	CP	YES
3.7.17.2-1	DC	NA
3.7.17.2-2	DC	NA
3.7.17.2-3	DC	NA
3.7.17.2-4	DC	NA
3.7.17.2-5	DC	NA
3.7.17.3-1	DC	NA
3.7.17.3-2	DC	NA
3.7.17.3-3	DC	NA
3.7.17.3-4	DC	NA
3.7.17.3-5	DC	NA
3.7.17.3-6	DC	NA
3.7.18-1	CP	YES
3.7.19-1	CP	YES
3.7.19-2	CP	YES
3.7.19-3	CP	YES
3.7.19-4	CP	YES
3.7.19-5	CP	YES
3.7.20-1	CP	YES
3.7.20-2	CP	YES
3.7.20-3	CP	YES
3.7.20-4	CP	YES
3.7.20-5	CP	YES
3.7.20-6	CP	YES
3.7 R DOCs	DC, CP, WC, CA	YES
TR 3.7-001	DC, CP, WC, CA	YES
TR 3.7-002	DC, CP, WC, CA	YES
TR 3.7-005	DC, CP, WC, CA	YES

INDEX OF ADDITIONAL INFORMATION  
(cont)

<u>ADDITIONAL INFORMATION NUMBER</u>	<u>APPLICABILITY</u>	<u>ENCLOSED</u>
CA 3.7-ED	CA	NA
CA 3.7-003	CA	NA
CA 3.7-004	CA	NA
CA 3.7-005	CA	NA
CA 3.7-008	CA	NA
CA 3.7-009	CA	NA
CP 3.7-ED	CP	YES
CP 3.7-004	CP	YES
CP 3.7-005	CP	YES
CP 3.7-008	CP, WC	YES
CP 3.7-009	CP, WC	YES
CP 3.7-012	CP	YES
CP 3.7-013	CP	YES
CP 3.7-014	CP	YES
CP 3.7-015	CP	YES
DC 3.7-ED	DC	NA
DC ALL-001 (3.7 changes only)	DC	NA
DC ALL-002 (3.7 changes only)	DC	NA
DC ALL-003 (3.7 changes only)	DC	NA
DC 3.7-008	DC	NA
DC 3.7-009	DC	NA
DC 3.7-0010	DC	NA
WC 3.7-001	WC	NA
WC 3.7-002	WC	NA
WC 3.7-003	WC	NA
WC 3.7-004	WC	NA
WC 3.7-005	WC	NA
WC 3.7-006	WC	NA
WC 3.7-007	WC	NA



**JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR  
PROVIDING ADDITIONAL INFORMATION**

The following methodology is followed for submitting additional information:

1. Each licensee is submitting a separate response for each section.
2. If an RAI does not apply to a licensee (i.e., does not actually impact the information that defines the technical specification change for that licensee), "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
3. If a licensee initiated change does not apply, "NA" has been entered in the index column labeled "ENCLOSED" and no information is provided in the response for that licensee.
4. The common portions of the "Additional Information Cover Sheets" are identical, except for brackets, where applicable (using the same methodology used in enclosures 3A, 3B, 4, 6A and 6B of the conversion submittals). The list of attached pages will vary to match the licensee specific conversion submittals. A licensee's FLOG response may not address all applicable plants if there is insufficient similarity in the plant specific responses to justify their inclusion in each submittal. In those cases, the response will be prefaced with a heading such as "PLANT SPECIFIC DISCUSSION."
5. Changes are indicated using the redline/strikeout tool of WordPerfect or by using a hand markup that indicates insertions and deletions. If the area being revised is not clear, the affected portion of the page is circled. The markup techniques vary as necessary, based on the specifics of the area being changed and the complexity of the changes, to provide the clearest possible indication of the changes.
6. A marginal note (the Additional Information Number from the index) is added in the right margin of each page being changed, adjacent to the area being changed, to identify the source of each change.
7. Some changes are not applicable to one licensee but still require changes to the Tables provided in Enclosures 3A, 3B, 4, 6A, and 6B of the original license amendment request to reflect the changes being made by one or more of the other licensees. These changes are not included in the additional information for the licensee to which the change does not apply, as the changes are only for consistency, do not technically affect the request for that licensee, and are being provided in the additional information being provided by the licensees for which the change is applicable. The complete set of changes for the license amendment request will be provided in a licensing amendment request supplement to be provided later.

**JOINT LICENSING SUBCOMMITTEE METHODOLOGY FOR  
PROVIDING ADDITIONAL INFORMATION**  
(continued)

8. The item numbers are formatted as follows:

[Source] [ITS Section]-[nnn]

Source =           Q - NRC Question  
                  CA - AmerenUE  
                  DC - PG&E  
                  WC - WCNOG  
                  CP - TU Electric  
                  TR - Traveler

ITS Section = The ITS section associated with the item (e.g., 3.3). If all sections are potentially impacted by a broad change or set of changes, "ALL" is used for the section number.

nnn = a three digit sequential number

## ADDITIONAL INFORMATION COVER SHEET

**ADDITIONAL INFORMATION NO:** Q 3.7.G-1

**APPLICABILITY:** DC, CP, WC, CA

**REQUEST:** ITS 3.7.X Bases

General

There have been a number of instances that the specific changes to the STS Bases are not properly identified with redline or strikeout marks.

**Comment:** Perform an audit of all STS Bases markups and identify instances where additions and/or deletions of Bases were not properly identified in the original submittal.

**FLOG RESPONSE:** The submitted ITS Bases markups for Section 2.0 have been compared to the STS Bases. Some differences that were identified were in accordance with the markup methodologies (e.g., deletion of brackets and reviewer's notes). Most of the differences were editorial in nature and would not have affected the review. Examples of editorial changes are:

- 1) Capitalizing a letter with only a "redline" but not striking out the lower case letter that it replaced.
- 2) Changing a verb from singular to plural by adding an "s" without "redlining" the "s".
- 3) Deleting instead of striking-out the A, B, C,... etc. following a specification title (e.g., SR3.6.6A.7).
- 4) Changing a bracketed reference (in the reference section) with only a "redline" for the new reference but failing to include the strike-out of the old reference.
- 5) In some instances the brackets were retained (and struck-out) but the unchanged text within the brackets was not redlined.
- 6) Not redlining a title of a bracketed section. The methodology calls for the section title to be redlined when an entire section was bracketed.
- 7) Additional text not contained in the STS Bases was added to the ITS Bases by the lead FLOG member during the development of the submittal. Once it was determined to not be applicable, the text was then struck-out and remains in the ITS Bases mark-up.

Differences of the above editorial nature will not be provided as attachments to this response. The pages requiring changes that are more than editorial and are not consistent with the markup methodology are attached.

### ATTACHED PAGES:

- Encl 5B
- B 3.7-26 - Failed to redline STS bracketed items (5 locations)
  - B 3.7-27 - Failed to redline STS bracketed item
  - B 3.7-31 - Failed to redline STS bracketed item
  - B 3.7-33 - Failed to redline STS bracketed frequency and Note 1. Also added and B 3.7-33a back Note 2 (struckout) which was inadvertently replaced with a duplicate struckout Note 1.
  - B 3.7-35 - Added back deleted text that should have been struckout instead of being deleted.
  - B 3.7-37 - Failed to redline STS bracketed item and added back deleted text that should have been struckout instead of being deleted.

- B 3.7-39 - Failed to redlined STS bracketed item
- B 3.7-44 - Failed to redlined STS bracketed text
- B 3.7-45 - Failed to redlined STS bracketed text (3 locations)
- B 3.7-54 - Added back deleted text that should have been struckout instead of being deleted.
- B 3.7-56 - Failed to redlined STS bracketed text
- B 3.7-61 - Failed to redlined STS bracketed text
- B 3.7-74 - Failed to redlined STS bracketed references (2 locations)
- B 3.7-78 - Failed to redlined STS bracketed text
- B 3.7-81 - Failed to redlined STS bracketed text
- B 3.7-82 - Failed to redlined STS bracketed text