



Log # TXX-98229
File # 10010
916
Ref. # 10 CFR 50.90
10 CFR 50.36

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

October 23, 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
FOLLOW-UP ITEMS RELATED TO THE PROPOSED CONVERSION TO THE
IMPROVED TECHNICAL SPECIFICATION SECTIONS 3.1, 3.2, 3.4, 3.5, AND 5.0**

- REF: 1) TU Electric letter, logged TXX-97105, from C. L. Terry to the NRC dated May 15, 1997
- 2) TU Electric letter, logged TXX-98182, from C. L. Terry to the NRC dated August 5, 1998
- 3) TU Electric letter, logged TXX-98195, from C. L. Terry to the NRC dated August 28, 1998

Gentlemen:

TU Electric requested an amendment to the Comanche Peak Facility Operating Licenses (NPF-87 for Unit 1 and NFP-89 for Unit 2) by incorporating changes to the Technical Specifications (TS) as provided in Reference 1. The NRC staff requested additional information regarding Section 3.1, "Reactivity Control Systems," Section 3.2, "Power Distribution Systems," Section 3.5, "Emergency Core Cooling Systems," Section 3.9, "Refueling Operations," and Section 4.0, "Design Features," which was provided in Reference 2. In addition, the NRC staff requested additional information regarding Section 3.4, "Reactor Coolant System," and Section 5.0, "Administrative Controls," which was provided in Reference 3. The Attachments to this letter provide (1) additional information or supporting documentation not provided in the original RAI response, (2) answers to follow-up questions, or (3) additional changes identified by the licensee.

This letter and its attachments are not a supplement to Reference 1. A supplement to Reference 1 will be provided at a later date.

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

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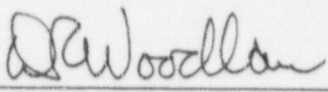
COMANCHE PEAK STEAM ELECTRIC STATION
P. O. Box 1002 Glen Rose, Texas 76043-1002

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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
Attachments

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 49th Street
Austin, Texas 78704

The item numbers are formatted as follows: [Source] [ITS Section]-[nnn]

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

ITS	Item Number	Applicability	Enclosed
3.1	Q 3.1-19	CA, WC	NA
3.1	Q 3.1-20	CP, DC	YES
3.1	CA 3.1-005 (new)	CA	NA
3.2	Q 3.2-3	CA, CP, DC, WC	YES
3.4	Q 3.4.13-5	DC	NA
3.4	Q 3.4.13-6	CA	NA
3.5	Q 3.5.5-1	CP, DC	YES
3.5	CA-3.5-001	CP (new)	YES
3.5	CA-3.5-002	CA, CP, DC, WC	YES
3.5	CA-3.5-004 (new)	CA	NA
3.5	CP-3.5-003 (new)	CP	YES
3.5	DC-3.5-002	DC	NA
3.5	DC-3.5-006	DC	NA
5.0	NR-5.0-001 (new)	CA, CP, DC, WC	YES

ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q3.1-20

APPLICABILITY: CP, DC

REQUEST: ITS 3.1.7 Rod Position Indication
CTS 3.1.3.2 Position Indication Systems - Operating (Comanche Peak & Diablo Canyon)
DOC 13-08-LS-20 & 13-09-LS-23 & 13-06-A
JFD 3.1-7 & 3.1-12

Comment: The ITS adopts Conditions and associated Required Actions from the Callaway's CTS, addressing more than one inoperable digital rod position indicator (DRPI) per group, which is not addressed in either the STS or the CTS. Furthermore, not all associated CTS Required Actions have been retained in the ITS; the Required Actions to take manual control of the rods and to record reactor coolant temperature every hour have not been retained. These actions, in one case affect rod movement and in the other case provide an indication that the rod(s) position may have changed, and therefore have a bearing on SDM and therefore should not be deleted if the Callaway condition of more than DRPI per group inoperable is retained. Either retain the CTS requirements and adopt the STS requirements, or provide a better justification for the ITS proposals of adopting the Callaway CTS requirements. This change is based upon proposed change WOG-73, Rev 1; which eventually may become a TSTF change request. What is the status of WOG-73, Rev 1? The STS wording of the note permitting separate condition entry should be retained with the STS Conditions and Required Actions.

FLOG Response (original) : No change. DCPD and CPSES wish to continue pursuing this change pending NRC review of WOG-73, Rev. 1, which has been submitted to the NRC as TSTF-234. This proposed change provides a specific set of compensatory actions and a 24 hour AOT for a situation previously unaddressed. Thus, the requirements of LCO 3.0.3 would be applicable and a plant shutdown would be required within 1 hour.

However, the partial loss of RCCA position indication is not an assumed initiating event, nor does it effect the outcome of any analyzed accident. Therefore, an one hour shutdown response is considered unnecessary when compared to other situations of similar severity where guidance was provided.

The contribution to plant safety of a well-balanced approach in avoiding unnecessary shutdowns is sufficient to warrant prompt NRC review and approval of TSTF-234. It would also be sufficient to warrant a separate License Amendment Request were the TSTF to be withdrawn from this submittal.

FLOG Response (revised): Per discussions with the NRC, since TSTF-234 has not yet been approved, the changes associated with the TSTF will be withdrawn. However, similar changes were accepted by the NRC for the Callaway and Wolf Creek CTS. Diablo Canyon and Comanche Peak will revise their request to be identical to that approved for Callaway and Wolf Creek. These changes are considered to be "beyond scope".

ATTACHED PAGES:

Encl 2	3/4 1-17
Encl 3B	7
Encl 5A	Traveler Status sheet (page 2), 3.1-18 and 3.1-19
Encl 5B	B 3.1-47
Encl 6A	2
Encl 6B	1