TXU Electric
Comanche Peak
Steam Electric Station
P. O. Box 1002
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lterry1@txu.com

C. Lance Terry
Senior Vice President & Principal Nuclear Officer

Log # TXX-99198
File # 10010
Ref. # 10CFR50.36

August 13, 1999

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
SUPPLEMENT TO LICENSE AMENDMENT REQUEST 98-010
(TAC Nos. MA4436 and MA4437)

REF: TXU Electric[1] letter, logged TXX-98265, from C. L. Terry to the NRC dated December 21, 1998

Gentlemen:

In the referenced letter, TXU Electric submitted a request to amend the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating changes into the CPSES Units 1 and 2 Technical Specifications and the CPSES Unit 2 Operating License to increase the licensed power for operation of CPSES Unit 2 to 3445 MWt; an increase of approximately 1%. Subsequently, while performing additional review of the calculations supporting the 1% uprate, TXU Electric determined that errors existed in the calculations and that a supplement to the license amendment request was necessary.

Attachment 1 is the affidavit for the information supplementing License Amendment Request 98-010. As these changes are a supplement to License Amendment Request

---

1 TXU Electric was formerly TU Electric. A license amendment request (LAR 99-003) was submitted per TXX-99122, dated May 14, 1999, to revise the company name contained in the CPSES operating licenses.

A001

LAR 98-010, Section II of the original description and assessment provided in the referenced letter has been revised and is included in this letter as Attachment 2, reflecting the use of the Technical Specifications through Amendment 64. Section IV of the original description and assessment, Significant Hazards Considerations Analysis, which addresses the no significance hazards consideration standards set forth in 10CFR50.92, remains valid and therefore does not require change. Attachment 3 provides revised marked up pages of the Technical Specifications.

If you have any questions regarding the attached information, please contact Mr. J. D. Seawright at (254) 897-0140.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Sincerely,

C. L. Terry

C. L. Terry

By: Roger D. Walker

Roger D. Walker
Regulatory Affairs Manager

JDS/jds
Attachment

c - Mr. E. W. Merschoff, Region IV
Mr. J. I. Tapia, Region IV
Mr. D. H. Jaffe, 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	)		
	)		
TXU Electric	)	Docket Nos.	50-445
	)		50-446
(Comanche Peak Steam Electric	)	License Nos.	NPF-87
Station, Units 1 & 2)	)		NPF-89

AFFIDAVIT

Roger D. Walker being duly sworn, hereby deposes and says that he is the Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this supplement regarding License Amendment Request 98-010; 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.

Roger D Walker

Roger D. Walker
Regulatory Affairs Manager

STATE OF TEXAS)
)
COUNTY OF Johnson)

Subscribed and sworn to before me, on this 13th day of August, 1999.

Carolyn L Cosentino

Notary Public

II. DESCRIPTION OF TECHNICAL SPECIFICATIONS CHANGE REQUEST

The Operating License for Unit 2 (NPF-89), section 2.C(1), identifies the maximum core thermal power level for which CPSES Unit 2 is authorized to operate as 3411 MWt. With the use of the Caldon, Inc., Leading Edge Flow Meter (LEFM(check)), TXU Electric proposes changing the maximum core power level to 3445 MWt.

TXU Electric proposes changing the definition of RATED THERMAL POWER (RTP) in the Technical Specifications to read:

> RTP shall be a total reactor core heat transfer rate to the reactor coolant of 3411 MWt for Unit 1 and 3445 MWt for Unit 2.

TXU Electric also proposes changing the Unit 2 Power Range Neutron Flux - High allowable value from "<111.7%" RTP to "<111.1%" RTP and the Unit 2 overpower N-16 allowable value from "<114.5%" RTP to "<113.4%" RTP. Consistent with the above, the Unit 2 overpower N-16 trip setpoint located in the BASES is changed from "<112%" RTP to "<110%" RTP.

TXU Electric has performed calculations to demonstrate that with the use of the LEFM(check), the uncertainty associated with the core power measurement may be reduced from the current value of 2% RTP to less than 1% RTP. Many of the safety analyses supporting the design and operation of CPSES include a power uncertainty of 2% RTP. Where practical, TXU Electric proposes to use the existing analyses to justify operation at the uprated power condition. That is, analyses performed at 3411 MWt with the application of a 2% RTP uncertainty allowance are equivalent to analyses performed at 3445 MWt with the application of a 1% RTP uncertainty allowance. Given this philosophy, the safety analysis limits of those Reactor Protection System functions that are expressed as a percentage of RTP will change. The affected functions are the overtemperature N-16, overpower N-16, and neutron flux, power range reactor trip functions. The overtemperature reactor trip function was explicitly analyzed in anticipation of the change to the RTP definition. Expressed as a percentage of RTP, the safety analysis limit used for the power range neutron flux and overpower reactor trip functions was decreased from 118% RTP to 116.9% RTP. It was necessary to revise the nominal trip setpoint and the allowable value associated with the overpower N-16 reactor trip function and the high neutron flux function. The allowable value for the overpower N-16 reactor trip function was reduced from ≤114.5% RTP to ≤113.4% RTP and the Power Range Neutron Flux - High from 111.7% RTP to 111.1% RTP. The nominal trip setpoint for the overpower N-16 trip setpoint was similarly reduced from ≤112% RTP to ≤110% RTP.

To summarize, TXU Electric proposes changing the reactor core licensed power level in CPSES Unit 2 from 3411 MWt to 3445 MWt. Associated with this change are revisions to the nominal trip setpoint and allowable value of the overpower N-16 reactor trip function. The analyses for Unit 2, Cycle 5 to determine the core safety limits was performed using methodologies which are NRC approved and satisfy the applicable safety analyses limits. The core safety limits were developed in anticipation of a core thermal power of 3445 MWt and, therefore, remain valid for an increase in core thermal power from 3411 MWt to 3445 MWt, accounting for a 1% RTP uncertainty. Similarly, the overtemperature reactor trip function nominal trip setpoint and allowable value, which protect the core safety limits, were developed to support operation at the 3445 MWt core power level.

ATTACHMENT 3 to TXX-99198

AFFECTED PAGES OF THE ITS TECHNICAL SPECIFICATIONS

Page 3.3-15

Page 3.3-16

Page B 3.3-64