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C. Lance Terry  
 Senior Vice President & Principal Nuclear Officer

Log # TXX-99205  
 File # 10010  
 Ref. # 10CFR50.36

August 26, 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  
 LAR-98-006, REVISION TO STEAM GENERATOR  
 TUBE PLUGGING CRITERIA (TAC NO. 3747)

REF: TXU Electric<sup>1</sup> Letter, logged TXX-98196, from C. L. Terry to the NRC  
 dated October 2, 1998

Per the referenced letter, TXU Electric proposed to amend Technical Specification 4.0.6, "Steam Generator Surveillance Requirements" which provides tube inspection requirements and acceptance criteria to determine the level of degradation for which the tube may remain in service. The proposed amendment would add definitions required for the F\* and it identifies the portion of the tube subject to the criteria.

During a recent teleconference with the NRC staff, TXU Electric discussed the methodology for determining the eddy current NDE measurement uncertainty to be used in conjunction with F\*. The resultant NDE uncertainty value is based on a 95/95 of the lower tolerance limit factor. TXU Electric will include a description of

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<sup>1</sup>. 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.

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the methodology used in applying the F\* criteria, including the associated NDE uncertainty, in the CPSES FSAR. In addition, clarifications to the Technical Specifications were discussed and are included in Attachment 2.

Attachment 1 is the affidavit required for information supporting a license amendment request. Attachment 2 provides clarifications to the Technical Specifications. In accordance with 10CFR50.91(b), TXU Electric is providing the State of Texas with a copy of this proposed amendment.

This communication contains the following new commitment which will be incorporated into the CPSES licensing bases in the next appropriate update to the FSAR:

CDF Number Commitment

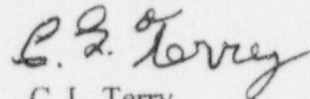
[27183] TXU Electric will include a description of the methodology used in applying the F\* criteria, including the associated NDE uncertainty, in the CPSES FSAR.

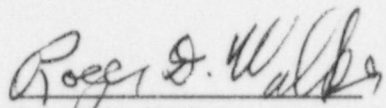
The CDF number is used by TXU Electric for the internal tracking of CPSES commitments.

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Should you require additional information regarding this matter, please contact  
Obaid Bhatti at (254) 897-5839.

Sincerely,

  
C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

OAB/oab

Attachments: 1) Affidavit  
2) Revised Technical Specification Pages

cc: E. W. Merschoff, Region IV  
J. I. Tapia, Region IV  
D. H. Jaffe, NRR  
Resident Inspectors, CPSES

Mr. Arthur C. Tate  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49th Street  
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