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Log # TXX-99231
File # 10010
916 (5.0)
Ref. # 10CFR50.90

November 8, 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
LICENSE AMENDMENT REQUEST (LAR) 99-007
REVISION TO VENTILATION FILTER TESTING PROGRAM

REF: TXU Electric letter TXX-99155 to NRC, dated July 11, 1999

Gentlemen:

Pursuant to 10CFR50.90, TXU Electric hereby requests an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating the attached change into the CPSES Unit 1 and 2 Technical Specifications. This license amendment request applies to both units.

The proposed change will revise the Ventilation Filter Testing Program (Technical Specification Section 5.5.11) to incorporate the guidance of NRC Generic Letter 99-02, specifically, the laboratory testing of ESF Ventilation System charcoal samples per ASTM D3803-1989 and application of a safety factor 2.0 to the charcoal filter efficiency assumed in the plant design-basis dose analyses.

Attachment 1 is the required affidavit. Attachment 2 provides a detailed description of the proposed change, a safety analysis of the change, and TXU Electric's determination that the proposed change does not involve a significant hazard consideration. Attachment 3 provides the affected Technical Specification pages marked-up to reflect the proposed change.

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TXU Electric requests approval of the proposed License Amendment by June 15, 2000. As required by Generic Letter 99-02, TXU Electric presently performs testing of the ESF ventilation system charcoal samples per ASTM D3803-1989.

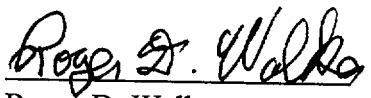
In accordance with 10CFR50.91(b), TXU Electric is providing the State of Texas with a copy of this proposed amendment.

This communication completes the commitment made in the referenced letter, and contains no new or revised commitments.

Should you have any questions, please contact Mr. Manu C. Patel at (254) 897-0139.

Sincerely,


C. L. Terry

By: 
Roger D. Walker
Regulatory Affairs Manager

MCP/mcp

Attachments

1. Affidavit
2. Description and Assessment
3. Affected Technical Specification page
(marked-up pages)

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

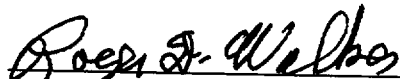
Mr. Authur C. Tate
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
TXU Electric Company)	Docket Nos. 50-445
)	50-446
(Comanche Peak Steam Electric Station,)	License Nos. NPF-87
Units 1 & 2))	NPF-89

AFFIDAVIT

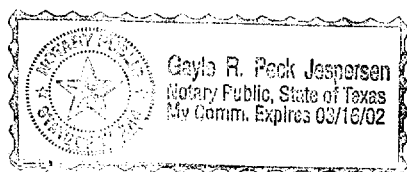
Roger D. Walker being duly sworn, hereby deposes and says that he is Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 99-007; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.




Roger D. Walker
Regulatory Affairs Manager

STATE OF TEXAS)
)
COUNTY OF Somervell)

Subscribed and sworn to before me, on this 8th day of November, 1999.





Notary Public

ATTACHMENT 2 to TXX-99231
DESCRIPTION AND ASSESSMENT

SIGNIFICANCE HAZARDS CONSIDERATION

I. BACKGROUND

The NRC has issued Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear Grade Activated Charcoal", to licensee's utilizing activated charcoal in their filtration systems to maintain operator and offsite dose within the guidelines of GDC 19 and 10CFR100. This required a revision to the Technical Specifications (TS) for the Comanche Peak Steam Electric Station (CPSES).

Implementing these changes to the TS fullfills the requirements of GL 99-02. The new requirements imposed on the testing of activated charcoal are not expected to cause a significant impact on the amount of charcoal to be replaced.

The changes were reviewed per 10 CFR 50.59 and do not create an unreviewed safety question but do involve a conservative change to the technical specifications. The changes have been implemented under 10CFR50.59 in accordance with Generic Letter 99-02. Previously, the charcoal samples were tested per the requirements of the EGG-CS-7653 protocol, with the exception that used charcoal samples were non-pre-equilibrated and tested at 30°C and 70 % Relative Humidity.

Technical Specification 5.5.11, Ventilation Filter Testing Program, is based on the filter testing program for Engineered Safety Feature (ESF) atmospheric clean-up units of the Standard Technical Specifications (NUREG-1431). For CPSES, it applies to the ESF units required to operate during and after an accident. The units consist of the Primary Plant ESF Exhaust Filtration Units and the Control Room Pressurization and Emergency Filtration units.

II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

The proposed revision to Technical Specification Section 5.5.11 consists of the following:

1) 5.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2 and in accordance with Regulatory Guide 1.52, Revision 2, ANSI/ASME N509-1980, and ANSI/ASME N510-1980, and **ASTM D3803-1989**.

Note: ANSI/ASME N510-1980, and ANSI/ASME N509-1980, and ASTM D3803-1989 shall be used in place of ANSI N510-1975, and ANSI/ASME N509-1976, and ASTM D3803-1979, respectively in complying with Regulatory Guide 1.52, Revision 2.

- 2) c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of $\leq 30^{\circ}\text{C}$ and greater than or equal to the relative humidity specified below.

ESF Ventilation System	Penetration	RH
Control Room Emergency filtration unit	0.2 0.5%	70%
Control Room Emergency pressurization unit	0.2 0.5%	70%
Primary Plant Ventilation System - ESF filtration unit	1.0 2.5%	70%

III. ANALYSIS

Each of these changes is discussed briefly below:

This proposed change adopts the new standard (ASTM D3803-1989) as the laboratory testing standard for all charcoal samples (new and used) from the charcoal adsorbers in the control room pressurization and emergency filtration units as well as the Primary Plant Ventilation ESF filtration units. Laboratory testing of the carbon samples taken from the charcoal adsorbers will be performed at $\leq 30^{\circ}\text{C}$ and 70% relative humidity for a methyl iodide penetration of 0.5% (for the Control Room filtration units) and 2.5% (for the Primary Plant Ventilation ESF filtration units), instead of the current 0.2% (CR filtration units) and 1% (for the Primary Plant Ventilation ESF filtration units) limit. This laboratory testing standard is more accurate, repeatable and provides consistent results.

The penetration allowables have increased slightly reflecting the decrease in the factor of safety from 5 to 2 in the new standard, when testing for adsorption and penetration.

Overall the new charcoal adsorber sample laboratory testing protocol is more stringent than the current testing practice and more accurately demonstrates the required performance of the adsorbers following a design basis LOCA. Therefore, these changes will not reduce the efficiencies assumed for the respective filtration systems.

The new requirements for testing activated charcoal is consistent with design basis accidents assumptions as well as NRC and industry standards. Based on the existing laboratory testing criteria for activated charcoal at CPSES, it is not expected that these changes will cause a significant reduction of activated charcoal life.

The proposed revision to Technical Specification 5.5.11 continues to provide the desired level of safety and, overall, is considered an enhancement to the plant.

IV. SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TXU Electric has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10CFR50.92(c) as discussed below:

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

The proposed changes only involve the laboratory testing methodology performed on activated charcoal to help determine whether the charcoal in the filtration units can remain in place or require replacement.

Generic Letter 99-02 intends to standardize the way nuclear-grade activated charcoal is tested throughout the industry in order to provide conservative filtration results as well as uniform and repeatable tests. The purpose is to ensure the filtration systems protect the Operators in the Control Room (GDC 19) as well as the public (10CFR100), in the event of a radiological accident scenario.

The charcoal adsorber sample laboratory testing per ASTM D3803-1989 is more stringent than the current testing practice and more accurately demonstrates the required performance of the adsorbers following a design basis LOCA. No Licensing Basis Accidents or mitigation capability will be affected by incorporation of these changes.

Therefore, this change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

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

Plant procedures are only altered to the extent that the revised specification will allow different reference standards for testing activated charcoal. These changes ensure continued support of the safety related ESF filtration equipment and do not affect their failure or failure modes.

Therefore, this change will 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?

None of the changes being proposed alter the environmental conditions maintained in the areas supported by the ESF filtration systems during normal operations and following an accident. Also these changes will not cause an increase in radiological releases through the Primary Plant Ventilation Exhaust System. As a result, the margin of safety for these functions remains the same.

Therefore, this change does not involve a significant reduction in a margin of safety.

Based on the above evaluations, TXU Electric determined that the requested Technical Specification changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. It does not create the possibility of a new or different kind of accident from any accident previously evaluated. It does not involve a reduction in the margin of safety. Therefore, the requested license amendment request does not involve a significant hazards consideration.

V. ENVIRONMENTAL EVALUATION

TXU Electric has evaluated the proposed changes and has determined that the changes meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9) as specified below:

- (i) The amendment involves no significant hazards consideration:

As demonstrated in Section IV above, the proposed change does not involve a significant hazards consideration.

(ii) There are no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed changes do not involve a change to the facility or operating procedures which could create new types or additional quantities of effluents. The change in charcoal sample testing protocol will not affect system performance or operation and ensures the filtration efficiency assumed in the offsite release analysis. Therefore, all offsite and control room doses will remain within the limits of 10CFR100 and 10CFR50, Appendix A, GDC 19.

(iii) There is no significant increase in the individual or cumulative occupational radiation exposure.

The change in charcoal sample laboratory testing protocol will not effect filter efficiency. Thus, this change will not result in a significant increase in individual or cumulative occupational radiation exposure.

Based on the above, it is concluded that there will be no impact on the environment resulting from the proposed changes and that the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10CFR51.22 (c)(9). Therefore, pursuant to 10CFR51.22 (b), an environmental assessment of the proposed changes is not required.

VI. REFERENCES

- 1) NRC Generic Letter 99-02, "Laboratory Testing of Nuclear -Grade Activated Charcoal", June 3, 1999.
- 2) ASTM D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon".