



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

Ref: 10CFR50.54(a)

CPSES-200100873
Log # TXX-01065
File # 10010

April 17, 2001

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
IMPLEMENTATION OF 10CFR50.59

REF: TXU Electric Letter, logged TXX-01044, from C. L. Terry to the NRC
dated March 9, 2001

Gentlemen:

TXU Electric provided May 30, 2001, as the scheduled date for implementation of the new 10CFR50.59 rule via the referenced letter. Since the new rule directs the compliance to 10CFR50.59 as a decision on regulatory review requirements, Quality Assurance Program changes regarding Station Operations Review Committee (SORC) review requirements are necessary as part of implementation. SORC is tasked with review responsibility to assure safe operation of CPSES.

Attachment 1 provides a description of the changes being made to Chapter 17 of the FSAR, the Quality Assurance Program. Attachment 2 provides portions of selected Chapter 17 sections of the FSAR, marked-up for implementation of the new 10CFR50.59 rule. These program changes provide for a more direct review of activities and the associated impact on nuclear safety. Therefore, the changes are not considered a reduction in commitments in the Quality Assurance Program in accordance with 10CFR50.54(a), but are considered enhancements and provided for your information. FSAR and Procedure updates are currently in process to implement these changes.

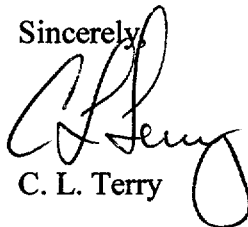
DO29

TXX-01065

Page 2 of 2

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2. Existing commitments derived from Chapter 17 of the FSAR are being updated as part of the FSAR update process to reflect the revised wording as provided in the attached mark-up.

Sincerely,



C. L. Terry

JDS/js

Attachments: 1. Change descriptions
2. FSAR Markup

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

Change Description

FSAR Section	Justification	QA Program impact
1A(B) (RG 1.33)	The 10CFR50.59 rule change revises the terminology used in ANSI N18.7-1976 from safety evaluation to 10CFR50.59 evaluation. This is a terminology change and therefore editorial, reflecting the rule change.	<u>None.</u> Make FSAR match revised regulation.
17.2.1.1.2.1.1 Paragraph b	Updated for the new 50.59 rule which eliminates the performance of a “safety evaluation” from the 50.59 process. The revised 50.59 rule has been changed from a “safety evaluation” and “unreviewed safety question” determination to a determination when prior regulatory review is required.	This change enhances the QA program by re-directing SORC review from evaluations performed pursuant to 10CFR50.59 to the actual activities (procedure changes, modifications, etc.) and the nuclear safety impact of those activities performed at CPSES. The scope of activities to be reviewed is expected to be greater than if SORC only reviewed 50.59 evaluations per the revised rule.
17.2.1.1.2.1.1 Paragraphs c & d 17.2.1.3.1 Paragraphs a, b, & c 17.2.1.6 Paragraph e 17.2.3 Third paragraph	Updated for the new 50.59 rule wording which eliminated the terminology “unreviewed safety question” and inserts a requirement to review changes requiring a license amendment pursuant to 10CFR50.59.	<u>None.</u> Make QA Program match revised regulation.
17.2.1.1.2.1.2 Paragraph b	Updated for the new 50.59 rule which eliminates the performance of a “safety evaluation” from the 50.59 process. The revised 50.59 rule has been changed from a “safety evaluation” and “unreviewed safety question” determination to a determination when prior regulatory review is required.	This change enhances the QA program by retaining safety reviews within the purview of the SORC and deleting the requirement to determine in writing that a USQ does not exist. Per the revised rule, the 10CFR50.59 evaluations no longer assess safety. As such, 10CFR50.59 approval is an administrative process that is now procedurally controlled and has been shifted to Regulatory Affairs.

FSAR Markup
Attachment 2 to TXX-01065

Sections: 1(AB), Reg Guide 1.33

17.2.1.1.2.1 Station Operations Review Committee (SORC)

17.2.1.3.1 ORC Reviews

17.2.1.6 Technical Review and Controls

17.2.3 DESIGN CONTROL

FSAR Markup

Regulatory Guide 1.33

Quality Assurance Program (Operation)

Discussion

The quality assurance requirements for the operations phase of CPSES are in compliance with Revision 2 (2/78) of this regulatory guide as implemented by ANSI N18.7-1976, "Administrative Controls and Quality Assurance for Operational Phase of Nuclear Power Plants", except for the requirement to perform biennial reviews of plant procedures.

The intent of the biennial review is accomplished by CPSES programmatic controls already in place. The following controls assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, regulatory requirements, industry experience and other conditions that may impact plant procedures.

- Site Modification Process
- Corrective Action Program
- Off-Normal Occurrence
- User Feedback and Procedure Compliance
- Operating Experience Review
- Vendor Technical Information
- Licensed Document Change/50.59 Evaluation
- Commitment Tracking System (CTS)
- Trending Activities
- Infrequently Performed Evolutions Control
- Requalification Training
- Quality Assurance Activities

In addition, biennial reviews are performed of non-routine procedures (Emergency Response guidelines (ERGs), Functional Restoration Guidelines (FRGs) and Abnormal Plant Operating Procedures (ABNs)).

Note: 10CFR50.59 has been revised and the terminology in Section 4.3.4 of ANSI N18.7-1976 is no longer current. Section 17.2 has been updated to reflect the revision to 10CFR50.59.

FSAR Markup

17.2.1.1.2.1 Station Operations Review Committee (SORC)

The SORC shall function to advise the Plant Manager (see Section 13.1.1.2.1) on all matters related to nuclear safety.

The SORC shall as a minimum be composed of managers or individuals reporting directly to managers from the areas listed below and meet the requirements of ANSI-N18.1-1971 Section 4.2 or 4.4 for required experience.

Operations
Maintenance
Instrumentation and Controls
Technical Support
Radiation Protection
Quality Assurance

The Plant Manager shall serve as the chairman of SORC. A senior health physicist is acceptable for the Radiation Protection representative on SORC. The SORC members shall be designated, in writing, by the Plant Manager (13.1.1.2.1)

All alternate members shall be appointed in writing by the Plant Manager (see Section 13.1.1.2.1) to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SORC activities at any one time.

The SORC shall meet at least once per calendar month and as convened by the SORC Chairman or his designated alternate.

The quorum of the SORC necessary for the performance of the SORC responsibility and authority shall consist of the Chairman or his designated alternate and a majority of the regular members (or their alternates).

17.2.1.1.2.1.1 The SORC shall be responsible for:

- a. Review of applicable administrative procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Review of ~~the safety evaluations for~~ (1) procedures, (2) change to procedures,

FSAR Markup

equipment, systems or facilities, and (3) tests or experiments *where nuclear safety is adversely affected*; ~~completed under the provision of 10CFR50.59 to verify that such actions did not constitute an unreviewed safety question;~~

- c. Review of proposed procedures and changes to procedures, equipment, systems or facilities which *require an amendment to the operating license*; ~~involve an unreviewed safety question as defined in 10CFR50.59 or involves a change in Technical Specifications;~~
- d. Review of proposed test or experiments which *require an amendment to the operating license*; ~~involve an unreviewed safety question as defined in 10CFR50.59 or requires a change in Technical Specifications;~~
- e. Review of proposed changes to Technical Specifications or the Operating License:
- f. Investigation of all violations of the Technical Specifications including the forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior Vice President & Principal Nuclear Officer and to the ORC:
- g. Review of reports or operating abnormalities, deviations from expected performance of plant equipment and of unanticipated deficiencies in the design or operation of structures, systems or components that affect nuclear safety;
- h. Review of all events submitted pursuant to 10CFR50.73. Other nonroutine reports may be reviewed at the discretion of the SORC Chairman or the responsible manager.
- i. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and Radwaste Treatment Systems;
- j. Review of any accidental, unplanned or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and dispositions of the corrective action to prevent recurrence and the forwarding of these reports to the Senior Vice President & Principal Nuclear Officer and to the ORC;
- k. Review of Unit operations to detect potential hazards to nuclear safety;

FSAR Markup

- l. Investigations or analysis of special subjects as requested by the Chairman of the ORC or the Plant Manager (see Section 13.1.1.2.1).
- m. Review of the Fire Protection Report and implementing procedures and submittal of recommended changes to the ORC; and
- n. Review of the Technical Requirements Manual and revision thereto.

17.2.1.1.2.1.2 The SORC shall:

- a. Recommend in writing to the designated manager (see Section 17.2.1.6) approval or disapproval of items considered under items a through e above. prior to their implementation, *and*;

~~_____ b. Render determinations in writing with regard to whether or not each item considered under items a through e above. constitutes an unreviewed safety question; and~~

- cb.* Provide written notification within 24 hours to the Senior Vice President & Principal Nuclear Officer, and the Operations Review Committee of disagreement between the SORC and the designated manager (see Section 17.2.1.6) however, the Plant Manager (see Section 13.1.1.2.1) shall have responsibility for resolution of such disagreements pursuant to Technical Specification 5.1.1.

The SORC shall maintain written minutes of each SORC meeting that, at a minimum, document the results of all SORC activities performed under the responsibility provisions above. Copies shall be provided to the Senior Vice President & Principal Nuclear Officer and the Operations Review Committee.

Any changes in the conduct of operation of the SORC will be made with the approval of the Plant Manager. Changes in the organization of the SORC will be made with the approval of the Plant Manager.

FSAR Markup

17.2.1.3.1 ORC Reviews

The ORC shall be responsible for the review of:

- a. The ~~safety~~ evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10CFR50.59, to verify that such actions did not *require an amendment to the operating license*; ~~constitute an unreviewed safety question~~;
- b. Proposed changes to procedures, equipment or systems which *require an amendment to the operating license*; ~~involve an unreviewed safety question as defined 10CFR50.59~~;
- c. Proposed tests or experiments which *require an amendment to the operating license*; ~~involve an unreviewed safety question as defined in 10CFR50.59~~;
- d. Proposed changes to Technical Specifications or ~~this~~ *the* Operating License;
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All events submitted pursuant to 10CFR50.73;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the SORC.

FSAR Markup

17.2.1.6 Technical Review and Controls

Activities which affect nuclear safety shall be conducted as follows:

- a. Procedures required by Technical Specification 5.5 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual/group other than the individual/group which prepared the procedure or procedure change, but who may be from the same organization as the individual/group which prepared the procedure or procedure change. The Plant Manager (see Section 13.1.1.2.1) shall approve Station Administrative Procedures. Other procedures shall be approved by the appropriate department manager as previously designated by the Plant Manager, in writing. Individuals responsible for procedure reviews shall be members of the Nuclear Operations Management Staff previously designated by the Plant Manager. Changes to procedures which do not change the intent of approved procedures may be approved for implementation by two members of the Nuclear Operations Management Staff, at least one of whom holds a Senior Operation License, provided such approval is prior to implementation and is documented. Such changes will be approved by the original approval authority within 14 days of implementation.
- b. Proposed tests and experiments which affect plant nuclear safety shall be prepared, reviewed and approved. Each such test or experiment shall be reviewed by a qualified individual/group other than the individual/group which prepared the proposed test or experiment. Proposed test and experiments shall be approved before implementation by the Plant Manager. Individuals responsible for conducting such reviews shall be members of the Nuclear Operations Management Staff previously designated by the Plant Manager (see Section 13.1.1.2.1)
- c. Proposed changes, or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Vice President, Nuclear Engineering and Support. Each such modification shall be reviewed by a qualified individual/group meeting the experience requirements of ANSI N18.1-1971. Section 4.6 other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modifications. Individuals/groups responsible for conducting such reviews shall be previously designed by the Vice President, Nuclear Engineering and Support. Proposed modifications to plant nuclear safety-related structures, systems, and components shall be approved by the Plant Manager

FSAR Markup

prior to implementation.

- d. Individuals responsible for reviews performed in accordance with the requirements of items a and b above, shall be members of the Nuclear Operations Management staff previously designated by the Plant Manager (see Section 13.1.1.2.1). Each such review shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be done in accordance with the appropriate qualification requirements; and
- e. Each review shall include a determination of whether or not *an amendment to the operating license is required*. ~~an unreviewed safety question is involved~~. For items *requiring an amendment to the operating license, involving unreviewed safety questions*, NRC approval shall be obtained prior to the Plant Manager approval for implementation.

Records of the above activities described above shall be provided to the Plant Manager (see Section 13.1.1.2.1), SORC, and/or ORC as necessary for the required reviews.

FSAR Markup

17.2.3 DESIGN CONTROL

Requirements for the control of design activities associated with modifications (involving a new design or change in existing design) of safety-related structures, systems, and components are consistent with the provisions of Regulatory Guide 1.33, and Regulatory Guide 1.64 as discussed in Appendix 1A(B).

The Plant Manager (see Section 13.1.1.2.1), or his designee, shall have the responsibility for approving and controlling the implementation of station design modifications. The Vice President of Nuclear Engineering and Support shall have the overall responsibility for developing procedures to maintain and control the design control process.

The SORC will submit all proposed station design modifications which involve a change in CPSES Technical Specifications or *other changes to the operating license* ~~an unreviewed safety question~~ to the ORC for review and approval before proceeding with implementation. ~~Safety 10CFR50.59 evaluations on station design modifications which do not require a license amendment involve unreviewed safety questions~~ or a change in CPSES Technical Specifications will be reviewed by ORC, however, this will not be a prerequisite for implementation. The Plant Manager (see Section 13.1.1.2.1), or his designee, approves each station design modification for implementation.

All design modification requests made by station personnel shall be submitted to the Vice President of Nuclear Engineering and Support for coordination of the station level engineering review. The actual change of design for those design modification requests approved by the Plant Manager (see Section 13.1.1.2.1) may be done by Nuclear Engineering and Support personnel or approved engineering services contractors. The above organizations will have approved design procedures and/or instructions before any design modifications are performed by the respective organization. These procedures and/or instructions will assure proper design review and verification. These procedures and instructions will also assure that design control is commensurate with the original design. The Vice President of Nuclear Engineering and Support will assure that the designer is provided with the latest revisions to all drawings, specifications, and other design documents which are applicable.