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Senior Vice President & Principal Nuclear Officer

Ref: 10CFR50.90

CPSES-200102265  
Log# TXX-01165  
File# 00236

October 2, 2001

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
SUBMITTAL OF LICENSE AMENDMENT REQUEST 01-02  
APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO  
ELIMINATE REQUIREMENTS FOR POST ACCIDENT SAMPLING SYSTEM  
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

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 change request applies equally to both units.

The proposed amendment would delete Technical Specification (TS) 5.5.3, "Post Accident Sampling System" and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS) at CPSES. The change is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000 as part of the consolidated line item improvement process (CLIIP). As discussed in the notice of availability for this TS improvement, this request also revises TS 5.5.2, "Primary Coolant Sources Outside Containment," to reflect the elimination of PASS.

Attachment II provides a description of the proposed change, the requested confirmation of applicability, and plant specific verifications. Attachment III provides the existing TS page marked-up to show the proposed change. Attachment IV provides the existing TS Bases page marked-up to show the proposed change (for information only). Attachment V provides the retyped technical specification page. Attachment VI provides a summary of the licensing commitments made in this submittal.

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TXX-01165  
Page 2 of 2

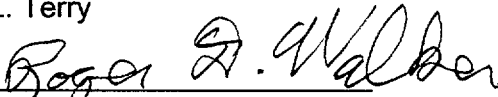
TXU Electric requests approval of the proposed License amendment by January 31, 2002, with the amendment being implemented by March 15, 2003. The approval date was administratively selected to allow for NRC review, but CPSES does not require this amendment to allow continued safe full power operation.

In accordance with 10 CFR 50.91(b), a copy of this amendment request, with attachments, is being provided to the designated Texas State Official.

If you should have any questions regarding this submittal, please contact Mr. Connie Wilkerson at (254) 897-0144.

Sincerely,

C. L. Terry

By: 

Roger D Walker  
Regulatory Affairs Manager

CLW/clw

Attachments:    I    -   Affidavit  
                     II    -   Description and Assessment  
                     III   -   Markup of Technical Specification Page  
                     IV   -   Markup of Technical Specification Bases Page  
                     V    -   Retyped Technical Specification Page  
                     VI   -   List of Commitments

cc:    Mr. E. W. Merschoff, Region IV  
         Mr. D. H. Jaffe, NRR  
         Mr. C. E. Johnson, Region IV  
         Resident Inspectors, CPSES


Mr. Arthur C. Tate  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49<sup>th</sup> 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 (CPSES), Units 1 & 2)	)		NPF-89

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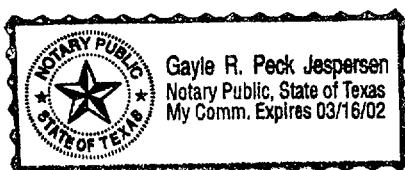
Roger D. Walker being duly sworn, hereby deposes and says that he is the CPSES Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 01-02; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Roger D. Walker  
CPSES Regulatory Affairs Manager

STATE OF TEXAS )  
 )  
COUNTY OF Somervell )

SUBSCRIBED and sworn to before me this 2nd day of October, 2001.

  
\_\_\_\_\_  
Notary Public



**ATTACHMENT II**  
**DESCRIPTION AND ASSESSMENT**

## **Description and Assessment**

### **1.0 INTRODUCTION**

This proposed License Amendment Request (LAR) is a request pursuant to 10 CFR 50.90 to revise Technical Specification (TS) 5.5.2, "Primary Coolant Sources Outside Containment," and delete TS 5.5.3, "Post Accident Sampling System."

### **2.0 DESCRIPTION**

The proposed License amendment would revise TS 5.5.2, "Primary Coolant Sources Outside Containment," to delete the Post Accident Sampling System (PASS) from the Primary Coolant Sources Outside Containment Program. The proposed License Amendment also deletes the program requirements of TS 5.5.3, "Post Accident Sampling System."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366 (Reference 1). The availability of this technical specification improvement was announced in Federal Register, Vol. 65, No. 211 (Reference 2), on October 31, 2000, as part of the consolidated line item improvement process (CLIIP).

### **3.0 BACKGROUND**

Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," (Reference 3) evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

### **4.0 TECHNICAL ANALYSIS**

#### **4.1 Applicability of Published Safety Evaluation**

TXU Electric has reviewed the safety evaluation published as part of the CLIIP. This included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev.2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000). TXU Electric has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the Comanche Peak Steam Electric Station (CPSES) and justify this amendment for the incorporation of the changes to the CPSES Technical Specifications.

## **4.2 Optional Changes and Variations**

TXU Electric is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

The CPSES TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that contain highly radioactive fluids during a serious transient or accident. PASS is specifically listed in TS 5.5.2 as falling under the scope of this requirement. As described in the staff's model safety evaluation published on October 31, 2000, TXU Electric is proposing to implement a modification such that PASS would not be a potential leakage path outside containment. This modification will not, however, be made during the implementation period for this amendment. As such, TS 5.5.2 is revised to add the phrase "(until such time as a modification eliminates the PASS penetration as a potential leakage path)". The above phrase makes clear that TS 5.5.2 remains applicable to the PASS as long as it is a possible leakage path and reflects that the actual modification of the piping system may be scheduled beyond the implementation period for this amendment.

The elimination of PASS results in changes to the discussion in the Bases section for TS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation." The current Bases mention the capabilities of PASS as part of the justification for allowing both hydrogen monitor channels to be out of service for a period of up to 72 hours. Proposed changes to the Bases for TS 3.3.3 are provided in Attachment IV. Attachment IV is provided for information and changes to the TS Bases will be processed in accordance with TS 5.5.14, "Technical Specification (TS) Bases Control Program."

## **5.0 REGULATORY ANALYSIS**

### **5.1 No Significant Hazards Determination**

TXU Electric has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. TXU Electric has concluded that the proposed determination presented in the notice is applicable to CPSES and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **5.2 Verification and Commitments**

As discussed in the notice of availability published in the Federal Register (Reference 2) for this technical specification improvement, plant-specific verifications were performed and commitments are as follows:

1. TXU Electric will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump fluid, and containment atmosphere. The contingency plans will be described and maintained in the radiological emergency response plan or chemistry procedures and implemented with the implementation of the License amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold will be established at 2-5% fuel clad damage. This level of core damage is associated with radioactivity levels of 300  $\mu\text{Ci/cc}$  dose equivalent iodine. This capability will be described and maintained in emergency plan implementing procedures and implemented with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.
3. TXU Electric has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described and maintained in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

## **6.0 ENVIRONMENTAL EVALUATION**

TXU Electric has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. TXU Electric has determined that the staff's findings presented in that evaluation are applicable to CPSES and the evaluation is hereby incorporated by reference for this application.

## **7.0 REFERENCES**

1. Industry/TSTF Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)."
2. Federal Register, Vol. 65, No. 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process", dated October 31, 2000.
3. Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," July 2000.

**ATTACHMENT III**  
**MARKUP OF TECHNICAL SPECIFICATION PAGE**  
(Page 5.0-8)



## 5.5 Programs and Manuals

### 5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

### 5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the post accident recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, RHR System and RCS Sampling System (Post Accident Sampling System portion only). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

(until such time as a modification eliminates the PASS penetration as a potential leakage path)

### 5.5.3

#### Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

Not Used

(continued)

## 5.5 Programs and Manuals (continued)

*Included for Information  
Only — No change to  
This page*

### 5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001 - 20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

(continued)

**ATTACHMENT IV**  
**MARKUP OF TECHNICAL SPECIFICATION BASES PAGE**  
**(For Information Only)**  
**(Page B 3.3-138)**

## BASES

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### ACTIONS

#### C.1 (continued)

Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur. Condition C is modified by a Note that excludes hydrogen monitor channels.

#### D.1

Condition D applies when two hydrogen monitor channels are inoperable. Required Action D.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on the backup capability of the Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide information for operator decisions. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

or other  
core damage  
assessment  
capabilities  
available

#### E.1

Condition E applies when the Required Action and associated Completion Time of Condition C or D are not met. Required Action E.1 requires entering the appropriate Condition referenced in Table 3.3.3-1 for the channel immediately. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition C or D, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

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**ATTACHMENT V**

**RETYPE TECHNICAL SPECIFICATION PAGE**

(Page 5.0-8)

## 5.5 Programs and Manuals

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### 5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

### 5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the post accident recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, RHR System and RCS Sampling System (Post Accident Sampling System portion only until such time as a modification eliminates the PASS penetration as a potential leakage path). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

### 5.5.3 Not Used

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(continued)

**ATTACHMENT VI**  
**LIST OF COMMITMENTS**

### LIST OF COMMITMENTS

The following table identifies those actions committed to by TXU Electric in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Roger Walker, Regulatory Affairs Manager at the Comanche Peak Steam Electric Station, (254) 897-8233.

COMMITMENT	Due Date/Event
TXU Electric will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump fluid, and containment atmosphere. The contingency plans will be described and maintained in the radiological emergency response plan or chemistry procedures and implemented with the implementation of the License amendment. Establishment of contingency plans is considered a regulatory commitment.	By 3/15/2003
The capability for classifying fuel damage events at the Alert level threshold will be established at 2-5% fuel clad damage. This level of core damage is associated with radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability will be described and maintained in emergency plan implementing procedures and implemented with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	By 3/15/2003
TXU Electric has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described and maintained in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete