



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: 10CFR50.90

CPSES-200103029
Log # TXX-01206
File # 00236

December 14, 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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION TO
LICENSE AMENDMENT REQUEST (LAR) 01-10: REVISION TO
TECHNICAL SPECIFICATION (TS) 3.9.4, CONTAINMENT
PENETRATIONS
(TAC NOS. MB3371 AND MB3372)

REF: TXU Electric Letter logged TXX-01153, from C. L. Terry to the NRC
dated November 8, 2001

Gentlemen:

Pursuant to 10CFR50.90, TXU Electric requested, via Reference, an amendment to the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating a change to the CPSES Units 1 and 2 Technical Specifications (TS) 3.9.4.

The proposed change will revise TS 3.9.4 entitled "Containment Penetrations," to allow the equipment hatch to be open during CORE ALTERATIONS and/or during movement of irradiated fuel assemblies within containment.

The purpose of this letter is to respond to the NRC Staff Requests for Additional Information (RAIs).

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

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Should you have any questions, please contact Mr. Jack C. Hicks at (254) 897-6725.

I state under penalty of perjury that the foregoing is true and correct.

Executed on December 14, 2001.

Sincerely

C. L. Terry

By: Roger D. Walker
Roger D. Walker
Regulatory Affairs Manager

JCH
Attachment

c - E. W. Merschoff, Region IV
J. A. Clark, Region IV
D. H. Jaffe, NRR
J. N. Donohew, NRR
Resident Inspectors, CPSES

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

**RESPONSE TO
REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT REQUEST 01-10**

The following are questions on the application dated November 8, 2001, (CPSES-200102356), for Comanche Peak Steam Electric Station (CPSES), that proposed changes to Technical Specification (TS) 3.9.4 to allow the equipment hatch to be open during movement of irradiated fuel assemblies inside containment.

Question 1:

Because the staff will be relying on the description of the administrative controls that are being added to the TS Bases if it approves the proposed amendments, it requests that the licensee agree to add the proposed changes to the TS Bases during the implementation of the amendments. This is requested so that (1) the description of the administrative controls are in the TS Bases before the amendments can be used and (2) any changes to the administrative controls would be governed by Bases control program in TS 5.5.14 (i.e., the change controls are in 10 CFR 50.59). To include this in the amendment implementation, would more than the 30 days requested in the letter be needed to implement the amendments?

TXU Electric Response:

TXU Electric agrees to add the proposed changes to the TS Bases prior to implementation of the amendment as stated in Attachment 2 to the referenced letter. We will not need more than the 30 days requested in the letter to implement the amendment.

Question 2:

Provide the estimated time for the rapid closure of the open equipment hatch, and the basis for the estimate. Discuss the hatch closure time with respect to the minimum time for the core to boil with loss of cooling at the beginning of fuel offload.

TXU Electric Response:

It takes approximately 8 minutes to close the open equipment hatch. This was demonstrated on 03/28/01 during 1RF08. The minimum time for the core to boil with loss of cooling at the beginning of fuel offload during 1RF08 was 6.3 hours. During the midloop condition prior to fuel offload, the minimum time for the core to boil with loss of cooling was 14.5 minutes. A Defense in Depth Contingency Plan provides additional measures to be in place to provide prompt closure of the Containment Equipment Hatch.

Question 3:

It is stated in Attachment 2 of the application (page 9 of 12) that the containment equipment hatch is not required for missile protection. Discuss if this is more than the missile protection for missiles from severe weather, such as tornados. Discuss what provides missile protection for inside containment from severe weather, and if the statement in the application is based on the missile shield being the missile protection for containment. If the missile shield provides this protection, provide the estimated time, in addition to the rapid closure of the open hatch, to cover the closed equipment hatch with the missile shield, and the basis for the estimate.

TXU Electric Response:

The Containment Equipment Hatch (inner cover) is not credited for missile protection.

The Containment Equipment Hatch Missile Shield (outer cover) provides missile protection from externally generated missiles. It is not required in MODES 5 or 6 because there are no essential targets between the equipment hatch and the inner missile barrier (i.e., steam generator compartments). Thus, were a tornado generated missile to come through the hatch, there would be no damage to systems or components required to maintain the reactor in a safe shutdown condition. The fuel and fuel handling equipment are protected from tornado missiles at all times.

Question 4:

It is stated in Attachment 2 of the application (page 9 of 12) that procedures are in place to suspend all fuel handling activities if tornado or severe weather warnings are in effect. Discuss if these activities include closing the equipment hatch and/or missile shield (if the missile shield is used to provide missile protection of item 3 above for the containment). Discuss if a severe weather warning is that severe weather has been reported or is imminent, and personnel should take precautions.

TXU Electric Response:

Procedures are in place to suspend all fuel handling activities if tornado or severe weather warnings are in effect. This does not require closing the equipment hatch or missile shield.

The National Weather Service (NWS) has a continuous radio broadcast service of weather conditions in the Dallas-Ft. Worth Area. A receiver capable of receiving and decoding the NWS alert tone for severe weather notifications is monitored in the Control Room for the issuance or cancellation of Severe Thunderstorm and Tornado Watches. A warning means a severe thunderstorm or tornado has been sighted or detected by radar and may be approaching. A watch means meteorological conditions

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are favorable for the formation of a severe thunderstorm or tornado.

Question 5:

Provide references to recent NRC staff letters or amendments that list the potential consequences of the Fuel Handling Accident Inside Containment for CPSES that were calculated by the staff.

Response:

NRC letter dated 09-05-00, Amendment 79 to FOL NPF-87 and NPF-89

TAC NOS. MA9071 and MA9072

Administrative Controls for Open Penetrations During Refueling Operations

NRC letter dated 03-18-96, Amendments 48 and 39 to FOL NPF-87 and NPF-89

TAC NOS. M94169 and M94168

Administrative Controls for Personnel Airlock Door During Refueling Operations