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Ref: 10CFR50.90

CPSES-200301113
Log # TXX-03044
File # 00236

June 5, 2003

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) 03-02
REVISION TO TECHNICAL SPECIFICATIONS REGARDING
EMERGENCY CORE COOLING SYSTEM ACCUMULATORS**

Gentlemen:

Pursuant to 10CFR50.90, TXU Generation Company LP (TXU Energy) 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 to both units.

The proposed amendment would extend the completion time from 1 hour to 24 hours for Condition B of Technical Specification (TS) 3.5.1, "Accumulators." The change is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-370, "Risk Informed Evaluation of an Extension to Accumulator Completion Times for Westinghouse Plants." The availability of this technical specification improvement was announced in the *Federal Register* on March 12, 2003 as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the affected Technical Specification pages marked-up to reflect the proposed changes.

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A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

TXX-03044

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Attachment 3 provides proposed changes to the Technical Specification Bases for information only. These Technical Specification Bases changes will be processed per CPSES site procedures. Attachment 4 provides retyped Technical Specification pages which incorporate the requested changes.

TXU Energy requests approval of the proposed License Amendment by December 1, 2003 to be implemented within 60 days of the issuance of the license amendment. The approval date was administratively selected to allow for NRC review. The plant does not require this amendment to allow continued operations.

TXU Energy is submitting this license amendment application as a result of a mutual agreement by an industry consortium of six plants known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of the six plants operated by TXU Energy, AmerenUE, Wolf Creek Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, and Arizona Public Service Company. Comanche Peak is the lead plant for this license amendment, however, only Diablo Canyon will be submitting a parallel submittal because the remaining STARS plants already have this change approved.

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

This communication contains no new or revised commitments.

Should you have any questions, please contact Mr. Bob Dacko at (254) 897-0122.

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

Executed on June 5, 2003.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner



C. L. Terry
Senior Vice President and Principal Nuclear Officer

BSD

Attachments 1. Description and Assessment
 2. Markup of Technical Specifications Pages
 3. Markup of Technical Specifications Bases Pages (for information)
 4. Retyped Technical Specifications Pages

c - T. P. Gwynn, Region IV
 W. D. Johnson, 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

ATTACHMENT 1 to TXX-03044
DESCRIPTION AND ASSESSMENT

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed License amendment extends the completion time from 1 hour to 24 hours for Condition B of Technical Specification (TS) 3.5.1, "Accumulators."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-370, "Risk Informed Evaluation of an Extension to Accumulator Completion Times for Westinghouse Plants." The availability of this technical specification improvement was announced in the *Federal Register* on March 12, 2003 as part of the consolidated line item improvement process (CLIIP).

No changes to the CPSES Final Safety Analysis Report are anticipated as this time as a result of this License Amendment Request.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

TXU Energy has reviewed the safety evaluation published on July 15, 2002 (67 FR 46542) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-370 (i.e., WCAP-15049-A, "Risk-Informed Evaluation of an Extension to Accumulator Completion Times," dated April, 1999). TXU Energy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 and justify this amendment for the incorporation of the changes to the CPSES Technical Specifications.

2.2 Optional Changes and Variations

TXU Energy is not proposing any variations or deviations from the technical specification changes described in TSTF-370 or the NRC staff's model safety evaluation published on July 15, 2002.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

TXU Energy has reviewed the proposed no significant hazards consideration determination published on July 15, 2002 (67 FR 46542) as part of the CLIIP. TXU Energy 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).

3.2 Verification and Commitments

There are no new regulatory commitments associated with this proposed change.

4.0 ENVIRONMENTAL EVALUATION

TXU Energy has reviewed the environmental evaluation included in the model safety evaluation published on July 15, 2002 (67 FR 46542) as part of the CLIIP. TXU Energy has concluded that the NRC staff's findings presented in that evaluation are applicable to CPSES and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2 to TXX-03044

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Page 3.5-1

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2,
MODE 3 with RCS pressure > 1000 psig

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME	
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours	
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	± 24 hours	Rev
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours	
	<u>AND</u> C.2 Reduce RCS pressure to ≤ 1000 psig.	12 hours	

(continued)

ATTACHMENT 3 to TXX-03044

**PROPOSED TECHNICAL SPECIFICATION BASES CHANGES (MARKUP)
(For Information Only)**

Pages B 3.5-6 through B 3.5-9

BASES

ACTIONS

A.1

If the boron concentration of one accumulator is not within limits, it must be returned to within the limits within 72 hours. In this Condition, the ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break LOCA is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current analyses demonstrate that the accumulators do not discharge following a large main steam line break. Even if they do discharge, their impact is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits.

B.1

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 4-24 hour. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these conditions, the 4-24 hour Completion Time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The Completion Time minimizes the potential for exposure of the plant to a LOCA under these conditions. The 24 hours allowed to restore an inoperable accumulator to OPERABLE status is justified - WCAP-15049-A, Rev. 1 (Ref. 5).

Rev

(continued)

BASES

ACTIONS (continued)

C.1 and C.2

If the accumulator cannot be returned to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and RCS pressure reduced to ≤ 1000 psig within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

D.1

If more than one accumulator is inoperable, the plant is in a condition outside the accident analyses; therefore, LCO 3.0.3 must be entered immediately.

SURVEILLANCE REQUIREMENTS

SR 3.5.1.1

Each accumulator valve should be verified to be fully open every 12 hours. This verification ensures that the accumulators are available for injection and ensures timely discovery if a valve should be less than fully open. If an isolation valve is not fully open, the rate of injection to the RCS would be reduced. Although a motor operated valve position should not change with power removed, a closed valve could result in not meeting accident analyses assumptions. This Frequency is considered reasonable in view of other administrative controls that ensure a mispositioned isolation valve is unlikely.

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**
(continued)

SR 3.5.1.2 and SR 3.5.1.3

Every 12 hours, borated water volume and nitrogen cover pressure are verified for each accumulator. This Frequency is sufficient to ensure adequate injection during a LOCA. Because of the static design of the accumulator, a 12 hour Frequency usually allows the operator to identify changes before limits are reached. Operating experience has shown this Frequency to be appropriate for early detection and correction of off normal trends.

Each accumulator is equipped with two level and two pressure channels. one channel of each is designated the primary channel and used for this surveillance except when declared inoperable. The second channel is used to perform channel checks and as backup to the primary channel. Surveillances are routinely performed on both channels.

Control Board indication may be used in the surveillances of the required indicated water volume. To allow for a 5% instrument inaccuracy and a 1% tank tolerance, control room indicated values of 39% and 61% are conservative and may be used in surveillance. Other means of surveillance which consider measurement uncertainty may also be used.

SR 3.5.1.4

The boron concentration should be verified to be within required limits for each accumulator every 31 days since the static design of the accumulators limits the ways in which the concentration can be changed. The 31 day Frequency is adequate to identify changes that could occur from mechanisms such as stratification or inleakage. Sampling the affected accumulator within 6 hours after a 1% volume increase (101 gallons) will identify whether inleakage has caused a reduction in boron concentration to below the required limit. It is not necessary to verify boron concentration if the added water inventory is from the refueling water storage tank (RWST), and the RWST has not been diluted since verifying that its boron concentration satisfies SR 3.5.4.3, because the water contained in the RWST is nominally within the accumulator boron concentration requirements. This is consistent with the recommendation of NUREG-1366 (Ref. 6 5).

Rev

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.1.5

Verification every 31 days that power is removed from each accumulator isolation valve operator when the RCS pressure is > 1000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor operated isolation valve. If this were to occur, only two accumulators would be available for injection given a single failure coincident with a LOCA. Since power is removed under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

This SR allows power to be supplied to the motor operated isolation valves when RCS pressure is ≤ 1000 psig.

REFERENCES

1. BTP ICSB-18 (Rev. 2, July 1981) "Application of the single failure criterion to manually controlled electrically operated valves.
2. FSAR, Chapter 6.
3. 10 CFR 50.46.
4. FSAR, Chapter 15.
5. WCAP-15049-A, Rev. 1, April 1999
- 6 5. NUREG-1366, December 1992.

Rev

ATTACHMENT 4 to TXX-03044
RETYPE TECHNICAL SPECIFICATION PAGES
Pages 3.5-1

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2,
MODE 3 with RCS pressure > 1000 psig

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Reduce RCS pressure to ≤ 1000 psig.	12 hours

(continued)