TXU Power

**TXU Power**
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Senior Vice President &
Chief Nuclear Officer

Ref: 10CFR50.90

CPSES-200501761
Log # TXX-05157

August 31, 2005

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 FOR LICENSE AMENDMENT REQUEST (LAR) 04-002: REVISION TO TECHNICAL SPECIFICATION (TS) 3.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION (TAC NO. MB2620/2621)

REF:
1) TXU Energy letter logged TXX-04049 from Mike Blevins to the NRC dated April 13, 2004
2) NRC letter from Mohan C. Thadani to Michael R. Blevins dated February 16, 2005
3) Letter from Alexander Marion, Nuclear Energy Institute, to James E. Lyons, Deputy Director, Division of Licensing Project Management dated March 18, 2005
4) TXU Power letter logged TXX-05067 from Mike Blevins to the NRC dated March 18, 2005
5) Letter from James A. Lyons, Deputy Director, Division of Licensing Project Management to Alexander Marion, Nuclear Energy Institute dated March 31, 2005.
6) Facsimile transmission from David H. Jaffe, NRC, to Rob Slough, TXU Power dated April 11, 2005.

Gentlemen:

In reference 1 above, TXU Generation Company LP (TXU Power) transmitted an application for amendment to Facility Operating License Number NPF-87 and NPF-89 for CPSES Unit 1 and Unit 2. The proposed amendment would revise the trip setpoint allowable value for Refueling Water Storage Tank (RWST) Level Low-Low (ESFAS function 7.b) for Unit 2 to be the same as for Unit 1. This change would

A001

also revise the frequency for calibration of the RWST water level transmitters for both units from 9 months to 18 months. Reference 2 forwarded a request for additional information to support the amendment application.

As part of a proposed generic resolution to the issues pertaining to the use of the Instrumentation, Systems, and Automation Society (ISA) Standard, ISA 67.04, Part II, Method 3, reference 3 forwarded a request from the Nuclear Energy Institute for the NRC staff to withdraw Requests for Additional Information (RAIs) concerning license amendment requests (LARs) involving instrument setpoints that are based on ISA Method 3.

Reference 4 provided TXU Power's response to the Staff's request for additional information in reference 2 and stated TXU Power's intention to conform to the industry resolution of this issue in any future submittals involving setpoints.

On March 31, 2005, reference 5 provided NRC's response to the Nuclear Energy Institute's letter of March 18, 2005 (reference 3). Reference 6 forwarded the NRC letter of March 31, 2005 (reference 5) to TXU Power for action.

This letter provides TXU Power's response to the request for additional information forwarded in reference 6.

In reference 5, the NRC stated "...the licensee's response ... needs to contain the following in order for the staff to complete its review:

1. An explicit regulatory commitment to adopt the final TSTF Technical Specification change to come into conformance with the existing understanding of the requirements of 10CFR50.36.

2. An explicit regulatory commitment to assess the operability of tested instrumentation based on the previous as-left instrument setting and accounting for the uncertainties associated with the test or calibration.

3. A revision to the Technical Specifications for the LSSS being changed by the LAR to incorporate a footnote that states :

   The as-left instrument setting shall be returned to a setting within the tolerance band of the trip setpoint established to protect the safety limit."

TXU Power hereby makes an explicit regulatory commitment to submit a license amendment request to adopt the final TSTF Technical Specification changes, as they may be applicable to CPSES, for the first proposed setpoint related change occurring more than 120 days after the approved TSTF is made available for adoption via the consolidated line item improvement process (CLIIP).

TXU Power currently assesses the operability and performance of the RWST Level Low-Low instrumentation, when tested, based on as-found instrument setting compared to calibration tolerances and allowable values. These values account for uncertainties associated with the test or calibration and instrument drift. If the instrument is found beyond the Allowable Value, it is declared inoperable; if it is found outside the calibration tolerance about the Nominal Trip Setpoint but within, or more conservative than, the Allowable Value, the channel is evaluated in the corrective action program for performance, reliability, and continued long-term operability. TXU Power will include any changes or clarifications to this practice in the future License Amendment Request committed to above.

The attachment to this letter contains proposed changes to the CPSES Unit 1 and Unit 2 Technical Specifications which incorporate the footnote as requested in item 3 of reference 5. These new pages replace the pages previously submitted in Attachments 2 and 4 of reference 1. These provisions were already contained in the TS Bases.

The additional information provided in this letter and attachment does not impact the conclusions of the No Significant Hazards Consideration provided in reference 1. In accordance with 10 CFR 50.91, a copy of this submittal is being provided to the designated Texas State official.

This communication contains the following new commitments which will be completed or incorporated into the CPSES licensing basis as noted:

| Number | Commitment | Due Date/Event |
|---|---|---|
| 27364 | Submit a license amendment request to adopt the final TSTF technical specification change, as it may be applicable to CPSES. | For the first proposed setpoint related change occurring more than 120 days after the approved TSTF is made available for adoption via the consolidated line item improvement process (CLIIP). |

The Commitment number is used by TXU Power for the internal tracking of CPSES commitments.

Should you have any questions, please contact Robert A. Slough at (254) 897-5727.

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

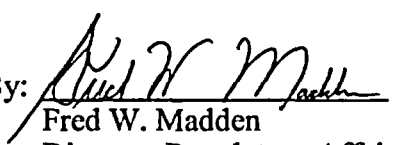
Executed on August 31, 2005.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

RAS
Attachment

c - B. S. Mallett, Region IV
M. C. Thadani, NRR
Resident Inspectors, CPSES

Ms. Alice Rogers
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78756-3189

Table 3.3.2-1 (page 6 of 6)
Engineered Safety Feature Actuation System Instrumentation

| FUNCTION | APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS | REQUIRED CHANNELS | CONDITIONS | SURVEILLANCE REQUIREMENTS | ALLOWABLE VALUE(a) | |
|---|---|---|---|---|---|---|
| 7. Automatic Switchover to Containment Sump | | | | | | |
| a. Automatic Actuation Logic and Actuation Relays | 1, 2, 3, 4 | 2 trains | C | SR 3.3.2.2<br>SR 3.3.2.4<br>SR 3.3.2.6 | NA | |
| b. Refueling Water Storage Tank (RWST) Level - Low Low | 1, 2, 3, 4 | 4 | K | SR 3.3.2.1<br>SR 3.3.2.5<br>SR 3.3.2.10<br>~~SR 3.3.2.12~~<br>SR 3.3.2.9 (q) | ≥ 43.9% instrument span<br>~~(Unit 1)~~<br>~~≥ 44.1% instrument span~~<br>~~(Unit 2)~~ | 73<br>73 |
| Coincident with Safety Injection | Refer to Function 1 (Safety Injection) for all initiation functions and requirements. | | | | | |
| 8. ESFAS Interlocks | | | | | | |
| a. Reactor Trip, P-4 | 1, 2, 3 | 1 per train, 2 trains | F | SR 3.3.2.11 | NA | |
| b. Pressurizer Pressure, P-11 | 1, 2, 3 | 3 | L | SR 3.3.2.5<br>SR 3.3.2.9 | ≤ 1975.2 psig (Unit 1)<br>≤ 1976.4 psig (Unit 2) | |

(a) The Allowable Value defines the limiting safety system setting. See the Bases for the Trip Setpoints.

(q) The as-left instrument setting shall be returned to a setting within the tolerance band of the Trip Setpoint established to protect the safety limit.

Table 3.3.2-1 (page 6 of 6)
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| a. Automatic Actuation Logic and Actuation Relays | 1, 2, 3, 4 | 2 trains | C | SR 3.3.2.2<br>SR 3.3.2.4<br>SR 3.3.2.6 | NA |
| b. Refueling Water Storage Tank (RWST) Level - Low Low | 1, 2, 3, 4 | 4 | K | SR 3.3.2.1<br>SR 3.3.2.5<br>SR 3.3.2.9<br>SR 3.3.2.10 | ≥ 43.9% instrument span (q) |
| Coincident with Safety Injection | Refer to Function 1 (Safety Injection) for all initiation functions and requirements. | | | | |
| 8. ESFAS Interlocks | | | | | |
| a. Reactor Trip, P-4 | 1, 2, 3 | 1 per train, 2 trains | F | SR 3.3.2.11 | NA |
| b. Pressurizer Pressure, P-11 | 1, 2, 3 | 3 | L | SR 3.3.2.5<br>SR 3.3.2.9 | ≤ 1975.2 psig (Unit 1)<br>≤ 1976.4 psig (Unit 2) |

(a) The Allowable Value defines the limiting safety system setting. See the Bases for the Trip Setpoints.
(q) The as-left instrument setting shall be returned to a setting within the tolerance band of the Trip Setpoint established to protect the safety limit.