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William J. Cahill, Jr.
Group Vice President

August 31, 1992

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
SUBMITTAL LAR 92-002
COMBINED UNIT 1 AND 2 TECHNICAL SPECIFICATIONS

Gentlemen:

Pursuant to 10CFR50.90, TU Electric hereby requests an amendment to the CPSES Unit 1 Operating License (NFP-87) by incorporating the enclosed changes into the CPSES Unit 1 Technical Specifications.

In general, the proposed changes revise the Unit 1 Technical Specifications to include Unit 2 to provide dual unit Technical Specifications. These changes are required to support the licensing of Unit 2.

Attachments 2 through 6 address the details of the proposed changes. Each attachment includes a detailed description of the proposed change, the basis for the change, a proposed "no significant hazards consideration" evaluation, and a marked up copy of the affected Technical Specifications (NUREG-1399 through Amendment 12). As a result of combining Unit 1 and Unit 2 into a single set of dual unit Technical Specifications, the footer on all pages should be revised to read "COMANCHE PEAK - UNITS 1 AND 2".

TU Electric requests approval in time to become effective upon issuance of the Unit 2 Operating License.

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Page 2 of 2

Should you have any questions, please contact Mr. Jimmy Seawright of Nuclear Licensing at (214)812-4375.

Sincerely,


William J. Cahill, Jr.

JDS/tg

Attachments: 1. Affidavit
2. Unit 2 Additions
3. Dual Unit Staffing
4. Station Service Water
5. Reduced Pressure Integrated Leakage Rate Testing
6. DNBR Safety Limit

c - Mr. J. L. Milhoan, Region IV
Mr. B. E. Holian, NRR
Mr. T. A. Bergman, NRR
Resident Inspectors, CPSES (2)

Mr. D. K. Lacker
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Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

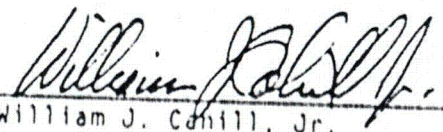
Texas Utilities Electric Company

(Comanche Peak Steam Electric
Station, Unit 1 & 2)

)
)
) Docket Nos. 50-445
) and 50-446
) License No. NFP-87
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AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request to the CPSES Unit 1 Operating License (NFP-87); 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.

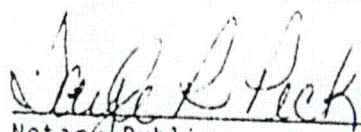


William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)

COUNTY OF DALLAS)

Subscribed and sworn to before me, on this 31st day of August,
1992.



Notary Public

Attachment 2 to TXX-92410
Page 1 of 6

Unit 2 Additions

Contents

Description and Assessment (50.92)

Pages 2 through 6

Marked-up Technical Specifications

Pages (NUREG 1399):

2-4 (Amendment 2), 2-5 (Amendment 2), 2-7, 2-8, insert for page 2-8, 3/4 0-1, insert for page 3/4 0-1, B 3/4 0-3, insert for page 3/4 0-3, 3/4 1-1, 3/4 3-2 (Amendment 10), insert for page 3/4 3-2, 3/4 3-5 (Amendment 10), insert for page 3/4 3-5, 3/4 3-6 (Amendment 10), insert for page 3/4 3-6, 3/4 3-8 (Amendment 10), insert for page 3/4 3-8, 3/4 3-11 (Amendment 10), insert for page 3/4 3-11, 3/4 3-12 (Amendment 10), insert for page 3/4 3-12, 3/4 3-25, 3/4 3-27 (Amendment 2), 3/4 3-28 (Amendment 2), 3/4 3-29, 3/4 3-40, 3/4 3-47, 3/4 4-15, 3/4 4-24, 3/4 4-25, 3/4 6-3, 3/4 7-2, 3/4 7-15, 3/4 7-16, 3/4 7-17, replacement 3.7.7.1 and 3.7.7.2 for page 3/4 7-17 (four pages), 3/4 7-24, 3/4 7-25, 3/4 8-11, insert for page 3/4 8-11, 3/4 8-15, insert for page 3/4 8-15, 3/4 9-1, 3/4 11-2, 3/4 11-3, B 3/4 1-1 (Amendment 5), B 3/4 1-2 (Amendment 6), B 3/4 4-6, B 3/4 4-8, insert page B 3/4 4-8a, B 3/4 4-13, B 3/4 6-1, and 6-17.

DESCRIPTION AND ASSESSMENT

I. BACKGROUND

Presently, the Comanche Peak Steam Electric Station (CPSES) Technical Specifications have Safety Limits and Limiting Conditions for Operation which are written to apply only to CPSES Unit 1 operation. The purpose of these changes is to revise those specifications as necessary to make the CPSES Technical Specifications applicable to both CPSES Unit 1 and Unit 2. These changes are of a plant specific nature although they were patterned from plants currently operating with two unit combined Technical Specifications. These changes are not of a safety significant nature, but are being requested to allow CPSES Units 1 and 2 to operate with common dual unit Technical Specifications.

Characteristics of the two units at CPSES which are important background information for these proposed changes are as follows. The control room and the associated air conditioning system is common to both units. The control room air conditioners can be powered from common electrical busses from either unit's electrical distribution system. The control room radiation monitors which are installed in this system are also common. The ultimate heat sink for both unit's station service water systems is a shared water source. As many of the buildings at CPSES are common or connected, the flood protection measures required to be taken on both units are simultaneous in order to prevent flooding. The Uninterruptable Power Supply (UPS) air conditioning system is also common and shared between the two units in a similar manner to the control room air conditioning. The waste gas holdup system is shared between the two units with common tanks and recombiners.

In many applications, Unit 2 uses Rosemount pressure transmitters, while Unit 1 utilizes Barton transmitters. These differences frequently result in differing Reactor Trip and Engineered Safety Feature Setpoints as there are different uncertainties associated with each transmitter type. These uncertainties were identified and incorporated into the Statistical Setpoint Study.

The two units at CPSES have different model Steam Generators and the Steam Generator level taps are located at different elevations.

II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

The proposed changes include those editorial changes, clarifications, and additions which are needed for the CPSES Unit 1 Technical Specifications to be applicable to both CPSES Units 1 and 2.

The change to page 3/4 0-1 and B 3/4 0-3 adds an additional Limiting Condition for Operation for the sole purpose of providing specific guidance on how the Limiting Conditions for Operation are applied when the condition applies to only one unit or is applicable to both units at the same time. Limiting Condition for Operation 3.0.5 and its associated BASES were added in their entirety.

The changes to pages 3/4 1-1, B 3/4 1-1 and B 3/4 1-2 add the required SHUTDOWN MARGIN for Unit 2.

The changes to page 3/4 3-2, 3/4 3-5, 3/4 3-6, 3/4 3-8, 3/4 3-11, and 3/4 3-12 revises the footnote related to the Boron Dilution Mitigation System to allow a six (6) month evaluation period following Unit 2 criticality.

The change to page 3/4 3-40 adds the clarifier "Units 1 and 2" following ACTION 28 as this ACTION will normally require both units to take action at the same time. This change is consistent with the change delineated in LCO 3.0.5.

The change to page 3/4 4-15 removes a reference to IWV-3427(b). The 1989 Edition of the ASME Boiler and Pressure Vessel Code Section XI (the Code) no longer contains IWV-3427(b), but references the ASME/ANSI OM Standard Part 10. The standard provides for several enhancements in valve testing (e.g. data collection and trending). The Unit 1 & 2 Inservice Testing plan was developed using the 1989 Edition of the Code.

The changes to pages 3/4 4-24, 3/4 4-25, B 3/4 4-6, B 3/4 4-8, and B 3/4 4-13 provide the Unit 2 reactor vessel material properties in the Material Property Basis section of Figures 3.4-2 and 3.4-3 the heatup and cooldown curves. The limiting heatup and cooldown curves for the CPSES Unit 2 reactor vessel are less restrictive than those for CPSES Unit 1. In an effort to reduce unit differences for operator human factors considerations, TU Electric has decided to adopt the more restrictive Unit 1 limitations for Unit 2. The adoption of the Unit 1 limitations, allows for the present figures to be maintained, but requires the addition of the Unit 2 Material Property Basis for completeness.

The changes to pages 3/4 3-47, 3/4 7-15, and 3/4 7-16, add the clarifier "Units 1 and 2" following the word ACTION at the beginning of each ACTION statement, as these ACTIONS will normally require both units to take action at the same time. These changes are consistent with the change delineated in LCO 3.0.5.

The change to page 3/4 7-17 splits LCO 3.7.7 on control room HVAC into two separate LCO's based on the unit's MODE. (i.e. both units in MODE 1, 2, 3, or 4; or, one unit in MODE 1, 2, 3, or 4 while the other unit is in MODE 5 or 6). This change is consistent with the change delineated in LCO 3.0.5.

The change to page 3/4 7-24 adds an "s" to "building" for the containment and safeguards buildings. This change is required to delineate that there are two safeguards and containment buildings as opposed to the shared electrical and control, fuel and auxiliary buildings.

The change to page 3/4 7-25 adds the clarifier "ACTION: Units 1 and 2" following the APPLICABILITY and prior to the ACTION statement, as this ACTION will normally require both units to take action at the same time.

This change is consistent with the change delineated in LCO 3.0.5. The addition of "ACTION:" is to correct an omission from the Unit 1 Technical Specifications.

The change to page 3/4 11-2 adds the clarifier "Units 1 and 2" following the word ACTION at the beginning of the ACTION statement, as this ACTION will normally require both units to take action at the same time. This change is consistent with the change delineated in LCO 3.0.5.

The change to page 3/4 11-3 adds the clarifier "Units 1 and 2" following the word ACTION at the beginning of the ACTION statement, as this ACTION will normally require both units to take action at the same time. This change is consistent with the change delineated in LCO 3.0.5.

The changes to pages 3/4 3-6, 3/4 6-3, 3/4 7-2, 3/4 9-1 and B 3/4 6-1 delete the unit designator from the beginning of valve identification numbers. TU Electric has attempted to maintain valve identification numbers identical between the two units except for the unit designator at the beginning of the identification number. The CPSES Units 1 and 2 Technical Specifications drop the unit designator where applicable such that the remainder of the identification number applies equally well to both units. This format is described in the added BASES 3.0.5.

The changes to pages 3/4 8-11 and 3/4 8-15, adds the component identification numbers for the Unit 2 equipment consistent with the change delineated in LCO 3.0.5.

The changes to pages 2-4, 2-5, 2-7, 2-8, 3/4 3-25, 3/4 3-27, 3/4 3-28 and 3/4 3-29 add the Unit 2 Reactor Trip and Engineered Safety Feature setpoints which differ from Unit 1. These changes are required based on one or more of the following: differences in the instrumentation hardware used between the two units; differences in the reactor core design methodologies; and differences in the Steam Generator designs.

The change to page 6-17 replaces the term "plant" which refers to both units, with "unit" when delineating the requirements related to submittal of the unit specific Startup Report.

In general, these changes add Unit 2 specific requirements and provide the clarifications necessary to determine unit applicability (e.g. Unit 1, Unit 2, or both units). These changes do not affect Unit 1 except for a specific ASME Boiler and Pressure Vessel Code reference which was out of date and was replaced with a reference to Specification 4.0.5 to keep the requirement consistent with the other Code requirements in the Technical Specifications.

III. ANALYSIS

Since these changes primarily affect Unit 2, the technical bases for these changes are being reviewed as part of the licensing of CPSES Unit 2. The specific information is supported by appropriate analysis. For example, the Unit 2 Reactor Trip and Engineered Safety Feature setpoints have been analyzed per a Statistical Setpoint Study. The analyses have

been performed per approved methodologies and are documented within approved calculations.

The methodology for delineating applicability within the proposed dual unit Technical Specification was based upon the methodologies used at other dual unit nuclear stations. The methodology proposed for CPSES has been reviewed by the operations group at CPSES to ensure its clarity and usability.

The adoption of the 1989 Edition of Section XI of the ASME Boiler and Pressure Vessel Code for pump and valve testing provides the equivalent level of assurance of operability as previous approved Editions and Addenda.

IV. SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Does the proposed change:

- a) Involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes involve the addition of those requirements necessary to make the CPSES Unit 1 Technical Specifications applicable to CPSES Units 1 and 2. As the changes are entirely focussed on the additional requirements for CPSES Unit 2, the proposed changes do not create the potential for any accidents or increase the probability of any accidents with CPSES Unit 1.

The changes do not impact any of the Unit 1 accident scenarios as the changes are for the inclusion of Unit 2. As the Unit 1 accident scenarios are not impacted there is no increase in the consequences of any previously evaluated accident.

- b) Create the possibility of a new or different kind of accident from any accident previously evaluated?

The changes to the LCO's and SURVEILLANCE REQUIREMENTS support operation of Unit 2 and have no impact on the types of accidents that could occur on Unit 1.

Therefore, this change does not create the possibility of a new or different kind of accident for CPSES Unit 1.

- c) Involve a significant reduction in the margin of safety, as defined by the basis of CPSES Unit 1 Technical Specifications?

The changes to the LCO's and SURVEILLANCE REQUIREMENTS include Unit 2 information and thus have no impact on the margin of safety which exist in the CPSES Unit 1 Technical Specifications. Therefore, there is no significant reduction in the margin of safety as defined by the basis of the CPSES Unit 1 Technical Specifications.

Based on the above evaluations, TU Electric concludes that the activity associated with the above described change presents no significant hazards consideration under the standards set out in 10 CFR 50.92(c) and, accordingly, a finding by the NRC of no significant hazards consideration is justified.

V. ENVIRONMENTAL EVALUATION

TU Electric has evaluated the proposed change and has determined that the change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9); therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.