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Ref. # 10CFR50.90  
10CFR50.36a

William J. Cahill, Jr.  
Group Vice President

April 25, 1994

U. S. Nuclear Regulatory Commission  
Attn: Document Control Room  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
SUBMITTAL OF LICENSE AMENDMENT REQUEST 94-012  
UPDATE UNIT STAFF QUALIFICATION REQUIREMENTS  
AND RELOCATE TRAINING REQUIREMENTS TO THE FSAR

Gentlemen:

Pursuant to 10CFR50.90, TU Electric hereby requests an amendment to the CPSES Unit 1 facility operating license (NPF-87) and CPSES Unit 2 facility operating license (NPF-89) by incorporating the attached changes into the CPSES Units 1 and 2 Technical Specifications. The purpose of this request is to update unit staff qualification requirements to Regulatory Guide 1.8, Revision 2, and relocate administrative control of training from Technical Specifications to the CPSES Final Safety Analysis Report.

Attachment 1 is the required affidavit. Attachment 2 provides a detailed description of the proposed changes, a safety analysis of the change, and TU Electric's determination that the proposed change does not involve a significant hazards consideration. Attachment 3 provides the affected Technical Specification pages, marked-up to reflect the proposed changes.

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

Upon approval of the proposed changes, TU Electric requests a 30 day implementation period following the date of license amendment issuance.

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400 N. Olive Street L.B. 81 Dallas, Texas 75201

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Should you have any questions, please contact Mr. Tim D. Baughman at  
(214) 812-4368.

Sincerely,

  
William J. Cahill, Jr.

TDB/grp

Attachments:     1.     Affidavit  
                  2.     Description and Assessment  
                  3.     Affected Technical Specification pages (NUREG-1468) as  
                          revised by all approved license amendments  
Enclosures:     1.     Standard Technical Specifications, Westinghouse Plants  
                          (NUREG-1431), Sections 5.3 and 5.4.

c - Mr. L. J. Callan, Region IV  
      Mr. L. A. Yandell, Region IV  
      Resident Inspectors, CPSES (2)  
      Mr. T. A. Bergman, NRR

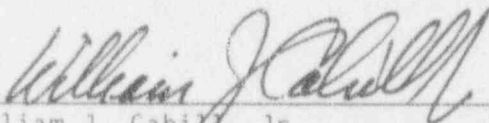
Mr. D. K. Lacker  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49th Street  
Austin, Texas 78704

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Texas Utilities Electric Company	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric	)	License Nos. NPF-87
Station, Units 1 & 2)	)	NPF-89

AFFIDAVIT

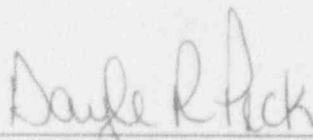
William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 94-012; that he is familiar with the content thereof; and that the 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, a Notary Public, on this 25th day of  
April, 1994.



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

ATTACHMENT 2 TO TXX-94119

DESCRIPTION AND ASSESSMENT

## DESCRIPTION AND ASSESSMENT

### I. Background

The present Technical Specification sections 6.3, "Unit Staff Qualifications" and 6.4 "Training" are a compilation of amendments encompassing the post TMI action plan period. Post TMI rule changes and industry initiatives necessitate updating the affected Technical Specification sections to be consistent with the current CPSES license basis, and the improved Standard Technical Specifications (STS), Westinghouse Plants, NUREG-1431 (reference 1).

Included in section 6.3 is a discussion of the Assistant Radiation Protection Manager. This position discussion was needed at the time that CPSES Unit 1 was licensed but due to personnel changes is no longer required. In preparing this License Amendment Request to remove this discussion, TU Electric has also updated these sections to incorporate more recent NRC guidance.

### II. Description of Technical Specification Change Request

Technical Specification section 6.3, "Unit Staff Qualifications" is being revised to read as follows:

"Each member of the unit staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 2."

The following specific changes are being made to section 6.3:

- The footnote which describes the position of Assistant Radiation Protection Manager is being deleted; and
- The remainder of the section (which includes a commitment to ANSI N18.1-1971 for comparable positions; a commitment to an NRC letter of March 28, 1980 (reference 2) for licensed Operators and Senior Operators; and a provision which permitted personnel to perform work when qualified for the task) is being replaced with a commitment to Regulatory Guide 1.8, Revision 2, 1987 (reference 3).

The information in Technical Specification section 6.4, "Training" (which includes who has responsibility for directing the maintenance of the training programs and the requirements for those programs, ANSI N18.1-1971, 10CFR55, and operational experience) is being relocated to the CPSES FSAR and the section will read "Not Used" to avoid renumbering the sections.

In summary, Technical Specification section 6.3 is being updated to later guidance (Regulatory Guide 1.8, Revision 2) and the position of Assistant Radiation Protection Manager is being deleted. Technical Specification section 6.4 is being relocated to the CPSES FSAR.

The changes to section 6.3 on unit staff qualifications are consistent with its associated section in the improved Standard Technical Specifications (STS), reference 1. The changes in section 6.4 on training do not follow the improved STS but use later guidance provided by the NRC (reference 7).

### III. Analysis

The current Technical Specification (NUREG-1468) section 6.3, "Unit Staff Qualifications" is a compilation of commitments to ANSI-N18.1-1971 (which was consistent with industry standards at that time), post TMI-2 requirements, and the upgraded requirements for the position of Radiation Protection Manager.

After the accident at TMI-2, the NRC issued a letter (the Denton letter) dated March 28, 1980 (reference 2), stating NRR requirements for upgrading the qualifications of licensed operators. This letter was intended as an interim requirement pending a revision to the regulations. The NRC later issued, pursuant to 10CFR50.54(f), a letter dated October 31, 1980, which outlined post TMI requirements listed per NUREG-0737 (reference 2) including the Denton letter, which stated that if the implementation date required was prior to issuance of an operating license, the requirement was a prerequisite to obtaining a license (CPSES was subject to this requirement). As a result, CPSES incorporated sections A and C of Enclosure 1 of the Denton letter into Technical Specification section 6.3.

CPSES also committed to the qualification requirements of Regulatory Guide 1.8, September 1975, for the Radiation Protection Manager (RPM) position. CPSES later requested and received a one time exception to this commitment (discussed in CPSES SSER 22) to allow the individual filling the RPM position at the time to not meet the full qualification requirements of Regulatory Guide 1.8, September 1975, as long as an assistant RPM met the full requirements. This exception is no longer required.



Regulatory Guide 1.8, Revision 2, issued April 1987 endorsed ANSI/ANS 3.1-1981 for the qualification of licensed operators, shift technical advisors, and the RPM. All other personnel qualifications would remain under ANSI N18.1-1971 (also endorsed by Regulatory Guide 1.8, Revision 2). The qualification requirements in ANSI/ANS 3.1-1981 are based upon post TMI (NUREG-0737) requirements, the Commission's policy statement on Engineering Expertise on Shift, and the upgrade of the RPM position per Regulatory Guide 1.8, September 1975. CPSES has already committed to Regulatory Guide 1.8, Revision 2, in Amendment 90 to the FSAR.

The amended Technical Specification Section 6.3 will be worded consistent with the improved Standard Technical Specification (STS) wording omitting a separate reference for the Shift Technical Advisor qualifications as it is embedded within the requirements of Regulatory Guide 1.8, Revision 2.

In summary, the proposed changes to section 6.3 deletes a discussion which is no longer required (the Assistant RPM discussion) and adopts a later guidance document which incorporates the existing requirements of this section. This is merely an administrative change and has no impact on actual unit staff qualifications.

The current Technical Specification section 6.4, "Training" commits to ANSI N18.1-1971 training requirements for all non-licensed positions referenced in the standard, and 10CFR55 for licensed operator training requirements. Prior to Unit 1 obtaining an operating license, and Technical Specifications becoming effective, CPSES upgraded the training programs to meet Regulatory Guide 1.8, Revision 2 to ensure the post TMI training requirements (per the NRC letter dated October 31, 1980 discussed previously) were met as a prerequisite to obtaining an operating license.

Regulatory Guide 1.8, Revision 2, applies to training programs not yet accredited by an accreditation program endorsed by the NRC. CPSES was accredited on October 25, 1990. The major revision to 10CFR55 (reference 4) published in 52 FR 9453 on March 25, 1987 (also issued as Generic Letter 87-07) incorporated the post TMI requirements and superseded all previous licensed operator regulations. The NRC issued 10CFR50.120 published in 58 FR 21904 (reference 5) on April 26, 1993, establishing rules governing non-licensed training programs. The NRC stated that an accredited training program is an acceptable means of compliance with the rules for all training programs referenced in 10CFR Parts 50 and 55.

CPSES, in Amendment 90 to the FSAR, updated its commitments to comply with the systematic approach to training requirements of 10CFR Parts 50 and 55 by maintaining accreditation, which supersedes the requirements of Regulatory Guide 1.8, Revision 2.

The Commission's policy statement on Technical Specification Improvements for Nuclear Power Reactors (58 FR 39132, reference 6) concludes that some administrative controls that are now located in technical specifications should be relocated to other documents such as the FSAR, which is enforceable through 10CFR50.59. In a letter dated October 25, 1993, to the NSSS Owners Group Technical Specification Committees (reference 7), Bill Russell of the NRR stated that the administrative controls section of the improved STS should not duplicate other regulatory requirements. In an attached mark-up of the improved STS section on training, the Staff recommended "striking out" this section and relocating the commitment in accordance with policy statement guidance. The administrative controls of Technical Specification section 6.4 are already located in FSAR section 13.2 and all future changes will be controlled per the 50.59 process, and the prescriptive requirements of 10CFR Parts 50 and 55. Overall responsibility for the training programs is discussed in section 13.1, "Organizational Structure of Applicants," of the FSAR.

In summary, the proposed changes to section 6.4, merely relocates the requirements for training from the technical specifications to the FSAR, where they are adequately described and properly controlled. As with section 6.3, this is merely an administrative change and there is no impact on the training programs at CPSES due to these changes.

#### IV. Significant Hazards Considerations Analysis

CPSES has evaluated whether or not a significant hazards consideration is involved with the proposed change by evaluation of the impact on the three standards set forth in 10CFR 50.92(c) as follows:

- 1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

This proposed amendment involves a consolidation of previous unit staff qualification requirements into one source document, and a relocation of training requirements to a more appropriate license basis document. The qualification requirements of the unit staff remains the same as the existing requirements, and the relocation of the training requirements does not change the scope of the program as it now exists. The relocated training program requirements retain adequate administrative and regulatory controls to ensure the plant is not placed in an unanalyzed condition.

These changes are administrative in nature. They remain within the assumptions of the current accident analysis. As a result, they do not increase the probability or consequences of an accident previously evaluated.



- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

These changes are administrative in nature. They merely consolidate qualification requirements and relocate training requirements. The relocated program requirements retain adequate administrative and regulatory controls to ensure the plant is not introduced to an unreviewed safety question.

These changes are administrative in nature. They do not introduce any new initiating events. As a result, they do not create a new or different kind of accident from any accident previously evaluated.

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

These changes are administrative in nature and have no impact on actual plant protection or safety actuation systems, or the assumed actions performed in accordance with normal, abnormal, or emergency operating procedures. There are adequate regulatory and plant configuration controls existing to ensure there is no impact on the plant margin of safety.

#### IV. Environmental Evaluation

The proposed changes to the CPSES Technical Specification have been reviewed against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration; nor increase the types and amounts of effluent that may be released offsite; nor increase the individual or cumulative occupational radiation exposures. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9); therefore, pursuant to 10CFR51.22(b), an environmental assessment of the proposed change is not required.

#### VI. References

1. NUREG-1431, "Standard Technical Specifications, Westinghouse Plants", September 1992.
2. NUREG-0737, "Clarification of TMI Action Plan Requirements", November 1980.
3. Regulatory Guide 1.8, Rev. 2, "Qualification and Training of Personnel for Nuclear Power Plants", April 1987.
4. "Operators' Licenses and Conforming Amendments", final rule dated March 25, 1987 (52 FR 9453).

5. "Training and Qualification of Nuclear Power Plant Personnel", final rule dated April 26, 1993 (58 FR 21904).
6. Commissioner's policy statement on "Technical Specification Improvements for Nuclear Power Plants" (58 FR 39132).
7. "Content of Standard Technical Specifications, Section 5.0, Administrative Controls" letter dated October 29, 1993 from Bill Russell (NRR) to NSSS Owners Group Technical Specification Committees Chairmen.

ATTACHMENT 3 TO TXX-94119

AFFECTED TECHNICAL SPECIFICATION PAGE  
(NUREG-1468)