



Log # TXX-94216  
File # 916 (6.0)  
Ref. # 10CFR50.90  
10CFR50.36

**TU**ELECTRIC

William J. Cahill, Jr.  
Group Vice President

August 12, 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 94-014  
REVISE ADMINISTRATIVE CONTROLS SECTION 6.0

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 revise the Administrative Controls Section to reflect TU Electric organizational changes, change the submittal due date for the Monthly Operating Report and delete provisions which will have been relocated to other controlled documents. These changes are equally applicable to CPSES Units 1 and 2.

TU Electric requests that these proposed changes be incorporated into the Technical Specifications as described in the attachments of this submittal. Attachment 1 is an affidavit; Attachment 2 provides a detailed description and assessment of the proposed changes; and Attachment 3 provides the proposed changes to the CPSES Technical Specifications.

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. Connie L. Wilkerson at  
(214) 812-8819.

Sincerely,

*William J. Cahill, Jr.*

William J. Cahill, Jr.

By: *Roger D. Walker*

Roger D. Walker

Regulatory Affairs Manager

CLW/grp

Attachments:

1. Affidavit
2. Description and Assessment
3. Affected Technical Specification pages (NUREG-1468) as revised by all approved license amendments

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

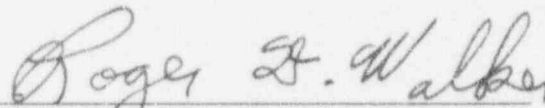
Mr. D. K. Lacker  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49th Street  
Austin, Texas 78704

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 )  
Station, Units 1 & 2) )

AFFIDAVIT

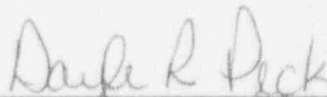
Roger D. Walker being duly sworn, hereby deposes and says that he is Regulatory Affairs Manager of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this License Amendment Request 94-014; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



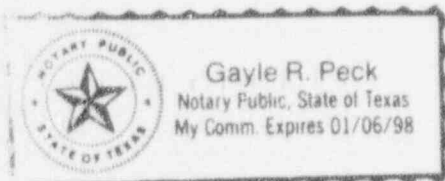
Roger D. Walker  
Regulatory Affairs Manager

STATE OF TEXAS )  
 )  
COUNTY OF Dallas )

Subscribed and sworn to before me, a Notary Public, on this 12th day of  
August, 1994.



Notary Public



ATTACHMENT 2 TO TXX-94216  
DESCRIPTION AND ASSESSMENT

## DESCRIPTION AND ASSESSMENT

### I. BACKGROUND

TU Electric has implemented changes to the TU Electric corporate and the CPSES site organizational structures. These changes, in part, were made to operate and support the operation of two units at CPSES. The changes were previously discussed with the NRC Project Manager for CPSES within the Office of Nuclear Reactor Regulation and are described in TU Electric letter TXX-93046 (Reference 1). This amendment request provides the updated organizational changes to the Administrative Controls Section of the CPSES Technical Specifications (TS) as committed by the above referenced letter (except for TS 6.3 "Unit Staff Qualification" and 6.4 "Training"); proposed changes to CPSES TS Administrative Controls 6.3 and 6.4 have already been submitted to the NRC per License Amendment Request 94-012 (Reference 2).

TU Electric foresees the possibility that future organizational changes may be appropriate to better assure safe and economical operation of CPSES. To allow for these potential changes without requiring future TS change requests, TU Electric developed proposed changes which will allow some flexibility and yet assure proper administrative controls.

NRC letter to the chairpersons of the NSSS technical specifications committees (Reference 3) concluded that certain provisions in the Administrative Controls (Section 5.0) of the improved Standard Technical Specifications may be relocated to other licensee documents for which changes to those provisions are adequately controlled by other regulatory requirements. Similarly, NRC Generic Letter 93-07 (Reference 4) provided guidance for relocating TS Administrative Controls related to the emergency and security plans and plan implementing procedures. Therefore, while revising the CPSES TS Administrative Controls for the organizational changes, TU Electric chose to delete the provisions which have been or can easily be relocated per the NRC's letters.

### II. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGE REQUEST

In accordance with 10CFR50.90, the following changes to the Administrative Controls (throughout Section 6.0) of the CPSES Units 1 and 2 Technical Specifications are proposed to reflect position title updates and reassigned functions as a result of TU Electric organizational changes:

1. The organizational position title and functions of the "Group Vice President, Nuclear Engineering and Operations" (6.2.1c.) are reassigned to the "Group Vice President, Nuclear Production".
2. The organizational position of the "Vice President, Nuclear Operations" (6.1.1, 6.2.1b., 6.7.1a., 6.7.1c. and 6.14b.) is retitled to "Vice President of Nuclear Operation.". The functions of the "Vice President,

Nuclear Operations" (6.1.1, 6.2.1b. and 6.14b.) and "Plant Manager" (6.1.1) are reassigned to the "Vice President of Nuclear Operations\*". A footnote is added (indicated by \*) to these specific functions which states that these duties may be performed by the Plant Manager if that organizational position is assigned.

3. The responsibility for approval of each proposed test or experiment and proposed changes and modifications to unit systems or equipment that affect nuclear safety is relocated within the Technical Specifications from Sections 6.5.3.1b. and 6.5.3.1c. to Section 6.1.1 and reassigned to the "Vice President of Nuclear Operations", or his designee, in accordance with approved administrative procedures".
4. The requirement for designation of the command function during any absence of the Shift Supervisor from the Control Room is relocated within the Technical Specifications from Table 6.2-1 to Section 6.1.2.
5. The function of the "Vice President, Nuclear Operations" for signing the annual management directive concerning the Shift Supervisor's Control Room command function (6.1.2) is reassigned to the "Group Vice President, Nuclear Production".
6. The notifications and submittals of Section 6.7.1 (Safety Limit Violations) are revised to add the "Plant Manager" position. Also, a footnote is added (indicated by \*) to the positions of Vice President of Nuclear Operations and Plant Manager as discussed in Sections 6.7.1a. and 6.7.1c. The footnote explains that the subject notifications/submittals shall be made to the manager if that organizational position is assigned.
7. The organizational position of "Shift Supervisor" (6.1.2, 6.2.2e. renumbered as 6.2.2d., 6.2.4.1 renumbered as 6.2.2g., and 6.12.2) is retitled to "Shift Manager".

Technical Specification requirements related to the Security Plan and implementing procedures and the Emergency Plan and implementing procedures (6.5.3, Technical Review and Controls, item 6.5.3.1f.; 6.8, Procedures and Programs, items 6.8.1c and 6.8.1d) which are adequately addressed by regulations are deleted from the Technical Specifications and relocated to other CPSES documents per Generic Letter 93-07.

Technical Specification 6.2.4.1 which provides requirements for the Shift Technical Advisor (STA) is renumbered as Technical Specification 6.2.2g..

Administrative controls which have been relocated to other CPSES documents, which are adequately controlled by other regulatory requirements, and are deleted from the Technical Specifications include:

- 6.2.2d. & Detailed composition and responsibilities of the minimum  
Table 6.2-1 shift crew
- 6.2.3 Independent Safety Engineering Group (ISEG)
- 6.5 Review and Audit
- 6.6 Reportable Event Action
- 6.8.1e. Implementing procedures for the Process Control Program  
(PCP)
- 6.8.2 Review and approval of procedures and revisions
- 6.8.3b. In Plant Radiation Monitoring
- 6.8.3f. Radiological Environmental Monitoring Program
- 6.9.1.1 Startup Report
- 6.10 Record Retention
- 6.11 Radiation Protection Program
- 6.13 Process Control Program (PCP)

The submittal due date of the Monthly Operating Report (6.9.1.5) is being changed from "no later than the 15th of each month" to "no later than the 20th of each month".

The Index and Technical Specification 6.14a. have been updated to reflect the changes above as necessary.

In summary, these changes revise the Administrative Controls in the CPSES Technical Specifications to reflect TU Electric organizational changes, change the submittal date for the Monthly Operating Report and delete provisions which will have been relocated to other controlled documents.

### III. ANALYSIS

The organizational changes described in Section II are the result of a management decision with respect to the completion and startup of CPSES Unit 2 and current operation and support of two units at CPSES. These changes are considered to be minor in nature as explained by the following:

1. The position title of the "Group Vice President, Nuclear Engineering and Operations" is changed to "Group Vice President, Nuclear Production" to simply reflect updated TU Electric organizational structure and company position titles. The functions associated with this management position as described in the CPSES Technical Specifications are not changed except for the additional responsibility in Section 6.1.2 (reassigned) for signing the annual management directive concerning the Shift Manager's control room command function.

2. The position title of the "Vice President, Nuclear Operations" is changed to "Vice President of Nuclear Operations" to simply reflect updated TU Electric organizational structure. The functions of the "Vice President, Nuclear Operations" (6.1.1, 6.2.1b. and 6.14b.) and "Plant Manager" (6.1.1) are reassigned to the "Vice President of Nuclear Operations\*". A footnote is added (indicated by \*) to these specific functions which states that these duties may be performed by the Plant Manager if that organizational position is assigned. This change assures that the responsibility is assigned to a qualified individual with the authority to exercise that responsibility and yet allows some flexibility for future personnel or organizational changes. At the discretion of senior TU Electric management, the organizational positions of "Vice President of Nuclear Operations" and "Plant Manager" may or may not both exist at CPSES at the same time.
3. The position title of "Shift Supervisor" is changed to "Shift Manager" to simply reflect updated TU Electric organizational structure. There are no changes to responsibilities/functions.

Administrative controls which have been relocated to other CPSES documents, which are adequately controlled by other regulatory requirements, and are deleted from the Technical Specifications. These controls have been relocated as noted below:

6.2.2d & Table 6.2-1	Detailed composition and responsibilities of the FSAR 13.1 minimum shift crew	
6.2.3	Independent Safety Engineering Group (ISEG)	FSAR 13.4
6.5	Review and Audit	FSAR 13.4
6.5.3.1f.	Review of Security Plan (SP), Emergency Plan (EP) implementing procedures	SP; EP
6.6	Reportable Event Action	FSAR 13.4
6.8.1c.	Security Plan Implementing Procedures	FSAR 13.5 & 13.6; SP
6.8.1d.	Emergency Plan Implementing Procedures	FSAR 13.5; EP
6.8.1e.	PCP Implementing procedures	FSAR 11.4 & 13.5
6.8.2	Review and approval of procedures and revisions	FSAR 13.4 & 13.5
6.8.3b.	In Plant Radiation Monitoring	FSAR 12.3 & III.D.3.3
6.8.3f.	Radiological Environmental Monitoring Program	ODCM*
6.9.1.1	Startup Report	FSAR 13.5
6.10	Record Retention	FSAR 13.5
6.11	Radiation Protection Program	FSAR 12.1, 12.5, & 13.5
6.13	Process Control Program (PCP)	FSAR 11.4

\*Offsite Dose Calculation Manual (ODCM)



As part of the FSAR, ODCM, SP and EP, the provisions of, and changes to, the above relocated controls must satisfy requirements of one or more of the following, as well as all other relevant regulatory requirements: 10 CFR 20.1101; 10 CFR 50.54; 10 CFR 50.72 and 50.73; 10 CFR 50.59; 10 CFR 50, Appendix B; 10 CFR 73.55; and 10 CFR 73.56.

The proposed change in the submittal due date of the Monthly Operating Report (from the 15th to the 20th of each month (6.9.1.5)) is to provide additional time to facilitate data compilation and report preparation, review and approval for two operating units. This change is strictly administrative and does not alter any data or information already reported.

#### IV. SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TU Electric has evaluated whether or not a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10CFR50.92(c) as discussed below.

Do the proposed changes:

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

The proposed changes are administrative in nature and reflect new organizational position titles, reassigned managerial responsibilities, a change in the required submittal due date of the Monthly Operating Report, and the relocation of selected Technical Specification Administrative Controls to licensee controlled documents. The proposed organizational changes include manager position title updates as follows: "Group Vice President, Nuclear Engineering and Operations" changed to "Group Vice President, Nuclear Production"; "Vice President, Nuclear Operation" changed to "Vice President of Nuclear Operations"; and "Shift Supervisor" changed to "Shift Manager". Manager responsibilities remain unchanged except the annual management directive concerning the Shift Supervisor's control room command function which is reassigned to the Group Vice President, Nuclear Production. Additionally, responsibilities of the Vice President, Nuclear Operations and Plant Manager are proposed for reassignment to either the Vice President of Nuclear Operations or the Plant Manager. In all cases, responsibilities will continue to be assigned to appropriately qualified individuals.

The proposed change in the submittal due date of the Monthly Operating Report is to provide additional time to facilitate data compilation and report preparation, review and approval for two operating units. This change does not alter any data or information already reported.

The proposed administrative control relocations include details of minimum shift operations crew staffing, method of onsite and offsite review and audit, selected reportable event actions, review of security and emergency plans and associated implementing procedures, requirements for record retention, and program elements for radiation protection, process control and radiological environmental monitoring. These administrative controls are addressed by other regulatory requirements and are relocated to other licensee documents (i.e., Final Safety Analysis Report, Emergency Plan, Security Plan, Offsite Dose Calculation Manual) which have adequate change control to ensure that intended plant design/safety functions will be maintained. No design basis accidents are affected by these proposed administrative changes as they do not impact nor affect accident analysis assumptions. Therefore, accident analyses assumptions are preserved and there is no change in the probability or consequences of any previously evaluated accident.

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

The proposed changes to update organizational position titles and reassign responsibilities will not delete any responsibility/function already designated in the Technical Specifications. All given management activities will continue to be performed by qualified individuals. The proposed change in the submittal due date of the Monthly Operating Report does not alter any data or information already reported. The administrative control relocations retain adequate regulatory basis to ensure that intended plant design/safety functions will be maintained. These changes are administrative in nature and do not affect the design or operation of any system, structure, or component in the plant. Accordingly, no new failure modes have been defined for any plant system or component important to safety, nor have any new initiating events been identified as a result of the proposed changes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Involve a significant reduction in a margin of safety?

The proposed changes involve the Administrative Controls Section of the CPSES Units 1 and 2 Technical Specifications and provide for updating organizational position titles, reassigning managerial responsibilities/functions, changing the required submittal due date for the Monthly Operating Report, and relocating administrative controls to other controlled licensee documents. These changes are administrative in nature and do not directly affect any protective boundaries nor impact the safety limits for the protective boundaries. The relocated requirements retain adequate regulatory basis for continued proper administrative review and plant configuration control to ensure that actions prescribed in plant operating procedures are maintained so as not to impact the plant's margin of safety. Therefore, there is no significant reduction in the margin of safety.

Based upon the results of the above evaluation, TU Electric concludes that the proposed changes do not involve a significant hazards consideration.

V. 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 effluents 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) TU Electric letter logged TXX-93046 from William J. Cahill, Jr. to NRC dated January 22, 1993, "TU Electric Organizational Changes".
- 2) TU Electric letter logged TXX-94119 from William J. Cahill, Jr. to NRC dated April 25, 1994 "License Amendment Request 94-012, Update Unit Staff Qualification Requirements and Relocate Training Requirements to the FSAR".
- 3) NRC Letter from William T. Russell, NRC, to Chairpersons NSSS Technical Specification Committees dated October 25, 1993
- 4) NRC Generic Letter 93-07 dated December 28, 1993, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans".

ATTACHMENT 3 TO TXX-94216

AFFECTED TECHNICAL SPECIFICATION PAGES

(NUREG-1468) REVISED BY ALL APPROVED

LICENSE AMENDMENTS

Pages xv, xvi and all of Section 6.0  
(Pages 6-1 through 6-25)