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Ref. # 10CFR50.54q

TUELECTRIC

September 1, 1994

C. Lance Terry
Group Vice President

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
REQUEST FOR NRC REVIEW AND APPROVAL
OF REVISIONS TO CPSES EMERGENCY
CLASSIFICATION PROCEDURE

- REF: (1) TU Electric letter logged TXX-94138 from
William J. Cahill, Jr. to the NRC dated
May 27, 1994
- (2) NRC Memorandum from R. L. Emch, NRR to
NRC Regional Offices dated July 11, 1994,
"Branch Position on Acceptable Deviations to
Appendix 1 to NUREG-0654/FEMA-REP-1"

Gentlemen:

In May, 1994 TU Electric submitted to the NRC a request for review and approval of proposed revisions to the CPSES Emergency Classification Procedure (Reference 1). After the NRC evaluation and followup discussions between the NRC and TU Electric, TU Electric has prepared a revised submittal that is enclosed herein for NRC review and approval. This submittal addresses issues raised by the NRC after review of the original submittal and also includes additional changes that TU Electric management desires incorporated. The additional changes have been discussed with, and are endorsed by, the appropriate offsite officials and have also been discussed with the NRC Region IV staff.

Enclosure 1 provides the proposed CPSES Emergency Plan, Revision 19, containing marked-up affected pages and a change summary and description/justification of the changes. Enclosure 2 contains a copy of the proposed new EPP-201 (Revision 9), "Assessment of Emergency Action Levels, Emergency Classification and Plan Activation", and a change summary and description/justification. The general summary and justification of proposed changes that were provided in Reference 1 remain applicable to this submittal. This submittal is also consistent with a recent NRC position paper on proposed licensee improvements to emergency action levels based on NUREG 0654/FEMA-REP-1 (Reference 2).

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TU Electric requests NRC approval of this submittal by September 30, 1994 in order to support available training time windows for CPSES licensed operators prior to the procedure change implementation. If there are any questions concerning this submittal, please contact Mr. Norman Hood at (817) 897-5889 or Mr. Connie Wilkerson at (214) 812-8819.

Sincerely,

C. L. Terry

By: D. R. Woodlan
D. R. Woodlan
Docket Licensing Manager

CLW/grp
Enclosures (2)

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