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Ref. # 10CFR50.90
10CFR50.36

C. Lance Terry
Group Vice President

September 19, 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 94-016
EMERGENCY CORE COOLING SYSTEM
CONTAINMENT SYSTEMS
PLANT SYSTEMS

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 18 month surveillance requirements for certain Emergency Core Cooling System, Containment System and Plant System specifications to delete the restriction that these surveillances be performed "during shutdown" or "during the REFUELING MODE or COLD SHUTDOWN." The primary impact of these changes is to reduce duplicative testing (which is now performed while shut down) and, as such, these changes will enhance safety. 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.

The impact of the existing requirements is 46 hours added to the critical path of the Fall 1994 refueling outage for CPSES Unit 2, which translates into a potential savings of well over \$1,000,000. The savings could be realized by TU Electric almost immediately if this amendment request is approved in time

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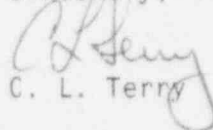
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to revise the Unit 2 outage schedule. Over the life of CPSES units 1 and 2, the projected savings would be in excess of 50 million dollars. As such, this license amendment request qualifies as a Cost Beneficial Licensing Action (CBLA) and should receive the expedited attention of the NRC staff.

In order to benefit from this amendment during the fall 1994 Unit 2 refueling outage, TU Electric requests approval by October 21, 1994. Upon approval of the proposed changes, TU Electric requests a 30 day implementation period following the date of license amendment issuance.

Should you have any questions, please contact Mr. Ray Adams at (214) 812-8826.

Sincerely,



C. L. Terry

RJA/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
Mr. D. D. Chamberlain, Region IV
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