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Ref. # 10CFR50.90
10CFR50.91
10CFR50.92

William J. Cahill, Jr.
Executive Vice President

April 22, 1991

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 1
DOCKET NO. 50-445
OPERATING LICENSE NPF-87
LICENSE AMENDMENT REQUEST 91-004
PROPOSED AMENDMENT TO THE UNIT 1 TECHNICAL
SPECIFICATION SECTION 6.2.3

Gentlemen:

Pursuant to 10CFR50.90 Texas Utilities Electric Company (TU Electric) hereby proposes to amend its Operating License NPF-87 by incorporating the attached License Amendment Request (LAR) into the Technical Specifications for the Comanche Peak Steam Electric Station (CPSES) Unit 1.

This request proposes to change the CPSES Unit 1 Technical Specifications paragraphs 6.2.3.1 and 6.2.3.4 concerning the reporting responsibilities for the CPSES Independent Safety Engineering Group (ISEG). Specifically, this change replaces the organizational position/function of Vice President, Nuclear Engineering with the organizational position/function of Executive Vice President, Nuclear Engineering and Operations (NEO).


TU Electric has reviewed the attached proposed amendment pursuant to 10CFR50.92 and determined that it does not involve a significant hazards consideration. The basis for this determination is provided in the attachments.

The CPSES Station Operation Review Committee (SORC) and Operations Review Committee (ORC) have reviewed and approved the proposed changes.

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TU Electric requests approval of this LAR by June 5, 1991. In accordance with 10CFR50.91(b), TU Electric is providing the State of Texas with a copy of this proposed amendment.

Sincerely,


William J. Cahill, Jr.

GLB/gj

Attachments

1. Significant Hazards Consideration (10CFR50.92) Evaluation.
2. Revised Technical Specification Pages Section 6.2.3.
3. Affidavit.

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)
Mr. J. W. Clifford, NRR

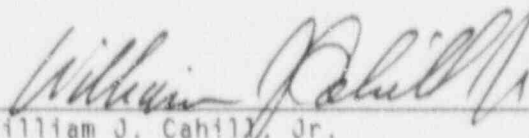
Mr. D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, Texas 78704

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Texas Utilities Electric Company) Docket No. 50-445
(Comanche Peak Steam Electric)
Station, Unit 1))

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Executive Vice President, Nuclear of TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached proposed change to the Comanche Peak Steam Electric Station Unit 1 Technical Specification Section 6.2.3.; 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.
Executive Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF Dallas)

Subscribed and sworn to before me, a Notary Public, on this 22nd day of
April, 1991.



Notary Public

SIGNIFICANT HAZARDS CONSIDERATION
Proposed CPSES Unit 1 Technical Specification Change

Changing Independent Safety Engineering
Group Reporting Responsibilities

LDCR TS-91-003

I. Description of the Proposed Technical Specific Change.

This request proposes to change the CPSES Unit 1 Technical Specifications paragraphs 6.2.3.1 and 6.2.3.4 concerning the reporting responsibilities for the CPSES Independent Safety Engineering Group (ISEG). Specifically, this change replaces the organizational position/function of Vice President, Nuclear Engineering with the organizational position/function of Executive Vice President, Nuclear Engineering and Operations (NEO).

II. Discussion

The proposed change does not affect any parameter used in accident analyses. It involves personnel and organizational changes resulting from attrition. Organizationally, the position of Vice President, Nuclear Engineering reported to the Executive Vice President, NEO. The ISEG organization function examined the operation of CPSES as well as other data parameters with the goal of improving unit safety. By reporting to the Vice President, Nuclear Engineering, ISEG was independent of plant operations. This change will not alter that independence.

ISEG recommendations and reports were provided to the Vice President, Nuclear Engineering. These recommendations and reports will now be provided to the Executive Vice President, NEO.

III. Application of Standards in 10CFR50.92

Does the proposed change:

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

The proposed change involves personnel changes at the executive level and does not impact nor effect accident analysis assumptions. Therefore, these assumptions are preserved and there is no change in the probability or consequences of any previously evaluated accident.

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

The proposed change does not degrade nor negate any of the reactor protection system safety functions. No change is made to the plant that would could create a new or different kind of accident.

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

The proposed change does not impact nor affect the bases and, therefore, does not reduce the margin of safety.

Based on the above evaluations, TU Electric concludes that the activity associated with the above described change present no significant hazards consideration under the standards set out in 10CFR50.92(c) and, accordingly, a finding by NRC of no significant hazards consideration is justified.

IV. 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 10CFR51.22(c); therefore, pursuant to 10CFR51.22(b), an environmental assessment of the proposed change is not required.

V. References:

- 1) CPSES FSAR Section 13.4.2.