



Log # TXX-94292
File # 10013 clo
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Ref. # 10CFR50.54(q)

November 4, 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
TRANSMITTAL OF CPSES EMERGENCY PLAN, REVISION 19

- REF: 1) TU Electric letter logged TXX-94230 from
C. L. Terry to the NRC dated September 1, 1994
- 2) NRC Region IV letter from Samuel J. Collins to
C. L. Terry dated October 6, 1994

Gentlemen:

In accordance with 10CFR50.54(q), TU Electric herewith submits Revision 19 of the CPSES Emergency Plan (EP). The changes comprising Revision 19 were evaluated and determined to not decrease the effectiveness of the existing plan. These changes were previously submitted to the NRC for review and approval prior to implementation by TU Electric (Reference 1). The NRC acceptance of the changes is documented in the NRC letter of October 6, 1994 (Reference 2). The changes were made effective at CPSES on November 1, 1994.

Changes are indicated by a Revision 19 change bar. A detailed description, provided as Attachment 1, discusses individual changes indicated by the change bar. The following is a general summary of the changes included in this revision to the CPSES Emergency Plan:

1. Revises Table 2.2, "Initiating Conditions for Emergency Classifications." The revised Table 2.2 lists general event categories based on NUREG-0654 and NUMARC/NESP-007 guidance and removes specific parameter values (i.e., specific Initiating Conditions/Emergency Action Levels (ICs/EALs)) which continue to be contained in the CPSES Emergency Plan Procedures (EPPs). Minor text changes to Sections 2.0, 2.1 and 2.2 were made to support the revision of Table 2.2.

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Page 2 of 2

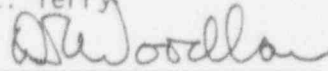
Enclosed is the following as prescribed in 10CFR50.4(b)(5):

CPSES EMERGENCY PLAN - 1 Original (REVISION 19)

Sincerely,

C. L. Terry

By:



D. R. Woodlan
Docket Licensing Manager

CLW/gp
Attachment
Enclosure

c - Mr. L. J. Callan, Region IV
Mr. B. Murray, Region IV
Ms. G. Good, Region IV
Resident Inspectors (2)
Mr. T. J. Polich, NRR

DETAILED DESCRIPTION

(as amended)

Group Description

2-1

3

Revise description in sections 2.0 and 2.1 to reflect additional bases of the CPSES Emergency Classification System and clarify that Table 2.2 only generally describes Initiating Conditions (ICs) for emergency classification.

Revision

The CPSES Emergency Classification System was revised to incorporate changes based in part on new guidance provided by NUMARC/NESP-007, Rev. 2, "Methodology for Development of Emergency Action Levels", NRC Regulatory Analysis for Revision of Reg. Guide 1.101 to Accept Guidance in NUMARC/NESP-007, Rev. 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" and TU Electric letter to NRC logged TXX-94230 "Request for NRC Review and Approval of Revisions to CPSES Emergency Classification System". NRC acceptance of the proposed changes was obtained by letter from NRC Region IV dated October 6, 1994. Information in the CPSES Emergency Plan Sections 2.0, 2.1, 2.2 and Table 2.2 was revised per the above documents. The specific IC/EAL information that was provided in Emergency Plan Table 2.2 is still maintained in the CPSES Emergency Plan Procedures (EPPs).

Change Request Number : EP-94-1.1

Commitment Register Number :

Related SER : SSER : APEND G

SER/SSER Impact : No

2-2

3

Revise description in section 2.2 to clarify that the specific conditions and associated limits for the ICs/EALs are specified in the Emergency Plan Procedures in lieu of CPSES Emergency Plan Table 2.2.

Revision

The CPSES Emergency Plan Table 2.2 was revised to reflect only general event categories that are based on guidance in both NUREG-0654 and NUMARC/NESP-007. For additional justification, see Change Number EP-94-1.1 above.

Change Request Number : EP-94-1.2

Commitment Register Number :

Related SER : SSER : APPEND G

SER/SSER Impact : No

2-3

3

Delete reference to NUREG-0818, "Emergency Action

EP Page
(as amended)

Group Description

Levels for Light Water Reactors" and add reference to NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels".

Revision :

The document NUREG-0818 was published only in DRAFT form and is relatively unimportant to CPSES bases for the emergency classification system. The document NUMARC/NESP-007 provides significant new bases to the revised CPSES Emergency Classification System.

See Change Number EP-94-01.1 for more justification.

Change Request Number : EP-94-1.3

Commitment Register Number :

Related SER : SSER : APPEND G

SER/SSER Impact : No

Table 2-2

3

See Sheet No(s) :1 and 2

Revise Table 2.2, "Initiating Conditions for Emergency Classifications".

Revision :

Revise the Table 2.2 information to delete specific details which are maintained current in the CPSES Emergency Plan Procedures. The revised Table 2.2 lists general event categories based on NUREG-0654 and NUMARC/NESP-007 guidance. See Change Number EP-94-01.1 above for more justification.

Change Request Number : EP-94-1.4

Commitment Register Number :

Related SER : SSER : APPEN G

SER/SSER Impact : No

ENCLOSURE TO TXX-94292

COMANCHE PEAK STEAM ELECTRIC STATION
EMERGENCY PLAN REVISION
INSTRUCTION SHEET

The following instructional information and check list is furnished to help insert Revision 19 into the Comanche Peak Steam Electric Station Emergency Plan (EP).

Discard the old sheets and insert the new sheets, as listed below.

<u>Remove</u>	<u>Insert</u>
Emergency Plan Title Page	Emergency Plan Title Page
2-1	2-1
2-2	2-2
2-3	2-3
Table 2.2	Table 2.2
Sheets 1 thru 24	Sheets 1 and 2
EPL-1	EPL-1
thru	thru
EPL-9	EPL-8