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C. Lance Terry
Group Vice President, Nuclear

June 9, 1995

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
TECHNICAL SPECIFICATION CONVERSION PROJECT
REVISED SUBMITTA SCHEDULE

- REF: 1) NUREG-1431, "Standard Technical Specifications Westinghouse Plants," September 1992.
2) "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," 58FR39132 of July 22, 1993.
3) TU Electric letter logged, TXX-94069 from C. L. Terry to the NRC dated March 4, 1994
4) TU Electric letter logged, TXX-94327 from C. L. Terry to the NRC dated December 19, 1994
5) TU Electric letter logger, TXX-95094 from C. L. Terry to the NRC dated April 3, 1995

Gentlemen:

The purpose of this letter is to notify the NRC that TU Electric now intends to complete and submit the License Amendment Request (LAR) for the conversion of the CPSES Unit 1 and 2 Technical Specifications to the format and expanded bases of the improved Standard Technical Specifications (STS) in April of 1996.

In September 1992, the NRC issued NUREG-1431 (reference 1) which contained the improved STS for Westinghouse plants. On July 22, 1993, the NRC issued a policy statement (reference 2) on the improved STS which encouraged their adoption and also allowed for the adoption of specific improvements, "line item improvements," without adopting the improved STS in their entirety.

TU Electric formed a task force in August of 1993 to recommend a course of action for CPSES regarding the adoption of all or a portion of the improved STS. The task force reviewed the improved STS, discussed options with other utilities and met with the Technical Specification Branch of the NRC. Based on the recommendations of that task force, TU Electric decided to embark on a program to convert the CPSES Unit 1 and 2 Technical Specifications to the format and content of the improved STS and to adopt a plant specific version of the expanded bases from the STS (reference 3). In the process, "line

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item improvements" contained in the improved STS would be reviewed and adopted as appropriate. In addition, TU Electric recognized that certain "line item improvements" offered safety improvements, enhanced operations and/or significant cost savings. TU Electric requested approval of these selected "line item improvements" via separate LARs. Some of the LARs have been approved while others are still pending.

The CPSES technical specification conversion program began in January 1994. The entire program, including NRC review and approval, and TU Electric implementation was projected to take three to four years.

Pursuant to 10CFR50.90, TU Electric submitted a conversion amendment for the CPSES operating licenses on December 19, 1994 (reference 4), to incorporate changes which were to be provided in future supplements to that request. Subsequent discussions with the NRC staff revealed their preference that licensees provide a single submittal to the NRC which covers the complete conversion of the licensee's technical specifications. Based on this, TU Electric withdrew this LAR (reference 5) and stated its intention to submit a new LAR at a later date to address the complete conversion of the Technical Specifications for CPSES Units 1 and 2.

More recently, the NRC staff has stressed the importance of converting technical specifications to the improved STS. In response to these admonitions and in recognition of the benefits that result from conversion, TU Electric has chosen to accelerate its conversion of the CPSES Technical Specifications. TU Electric now intends to complete and submit the LAR for the conversion of the CPSES Unit 1 and 2 Technical Specifications to the format and expanded bases of the improved STS in April of 1996.

Sincerely,

C. L. Terry

C. L. Terry

By: *Roger D. Walker*
Roger D. Walker
Regulatory Affairs Manager

DRW/grp
Attachment

c - Mr. L. J. Callan, Region IV
Mr. D. F. Kirsch, Region IV
Resident Inspectors
Mr. T. J. Polich, NRR