

**TU**ELECTRIC

Log # TXX-95292  
File # 10010  
916.5 (GEN)  
Ref. # 10CFR50.90  
10CFR50.36

C. Lance Terry  
Group Vice President, Nuclear

November 28, 1995

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

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

- REF: 1) TU Electric letter logged, TXX-95165 from C. L. Terry  
to the NRC dated June 9, 1995
- 2) NUREG-1431, "Standard Technical Specifications Westinghouse  
Plants," Revision 1, April 1995.

Dear Sirs:

In the referenced letter, TU Electric notified the NRC of its intention to complete and submit the License Amendment Request (LAR) for the conversion of the CPSES Unit 1 and 2 Technical Specifications (TS) to the format and expanded bases of the improved Standard Technical Specifications (STS) in April of 1996. This letter revises that intention as discussed at the meeting on November 14, 1995, between members of the NRC Staff and representatives of TU Electric, Pacific Gas and Electric Company, Wolf Creek Nuclear Operating Corporation, and Union Electric Company (hereafter the "Group").

The NRC staff has stressed the importance of converting technical specifications to the improved STS. The NRC staff has also stressed the value of licensees working together to increase standardization and to reduce the NRC resources needed to act on licensing matters. In response to these recommendations and in recognition of the benefits that result, TU Electric has chosen to work jointly with the Group in the conversion of the CPSES Technical Specifications. As a result, the submittal of the LAR to convert the CPSES TS will be delayed approximately seven months. TU Electric believes the benefits, both near term and long term, clearly justify this action.

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The Group will jointly develop a full conversion submittal based on NUREG-1431 Revision 1 (reference 2). Submittals for all four utilities will address the generic features of the Group members' TS in an identical fashion, will include applicability matrices to correlate the Group members' TS submittals, and will be docketed at approximately the same time (target date, December 1996). The Group anticipates a 4 to 6 month review by the NRC with the resultant review cost savings for each utility as outlined at the meeting. This commitment is based on the following understandings reached at the meeting:

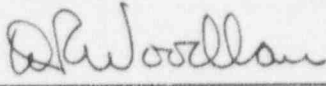
1. Each plant may maintain its licensing basis as established by its existing TS in the conversion process. With appropriate justification, a given utility may optimize their TS based on another Group member's existing TS. The goal is to maximize commonality.
2. Plant specific license amendment requests (LARs) will continue to receive timely consideration during the conversion process and especially during the NRC review cycle. The Group will screen and limit these to the extent possible, yet it must be recognized that LARs in support of reloads and those representing either safety issues or significant cost savings will receive due consideration. Where possible, LARs submitted during the next 18 months will be jointly developed and submitted by the Group to conserve NRC review resources.
3. The effective date for new Surveillance Requirements with a fuel cycle frequency, imposed as a result of the conversion, will be the next refueling outage occurring after the implementation of the individual plant's amendment.
4. A single point of contact will be established within the Projects and OTSB offices at NRR. Likewise the Group's single point of contact is Don Woodlan of TU Electric.
5. Given the above commitment to conversion, enforcement discretion will not be denied or delayed solely on the basis that a given plant has not yet converted, especially when the basis of the requested discretion is NUREG-1431 Revision 1. Each request for such discretion will be judged on its own merit.

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If you have any questions on the above, please contact the Group chairman,  
Don Woodlan of TU Electric, at (214)812-8225.

Sincerely,

C. L. Terry

By:   
D. R. Woodlan  
Docket Licensing Manager

DRW

cc: Mr. L. J. Callan, Region IV  
Mr. W. D. Johnson, Region IV  
Mr. T. J. Polich, NRR  
Resident Inspectors