

March 24, 2000

Template = NRR-558

Mr. C. Lance Terry
Senior Vice President
& Principal Nuclear Officer
TXU Electric
Attn: Regulatory Affairs Department
P. O. Box 1002
Glen Rose, Texas 76043

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 -
ISSUANCE OF AMENDMENTS RE: CHANGES TO THE TECHNICAL
SPECIFICATIONS CONCERNING THE EMERGENCY DIESEL GENERATOR
LUBE OIL LEVEL AND DC SOURCES (TAC NOS. MA8036 AND MA8037)**

Dear Mr. Terry:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 75 to Facility Operating License No. NPF-87 and Amendment No. 75 to Facility Operating License No. NPF-89 for Comanche Peak Steam Electric Station, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated January 13, 2000.

The amendments: (1) revise TS 3.8.3 (Condition B and Surveillance Requirement (SR) 3.8.3.2) to increase the required emergency diesel generator (EDG) lube oil inventory values; (2) revise SR 3.8.3.2, for EDG lube oil inventory, to add a note stating that the surveillance is not required to be performed until the diesel has been in shutdown greater than 10 hours; and (3) delete the footnote associated with SR 3.8.4.7 which provided a "one time only" alternative to battery testing requirements.

A copy of our related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,
/RA/

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Docket Nos. 50-445 and 50-446

Enclosures:

- 1. Amendment No. 75 to NPF-87
- 2. Amendment No. 75 to NPF-89
- 3. Safety Evaluation

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Comanche Peak Steam Electric Station

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TXU ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT NO. 1

DOCKET NO. 50-445

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. ⁷⁵
License No. NPF-87


1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by TXU Electric Company (TXU Electric) dated January 13, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-87 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 75 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TXU Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: March 24, 2000



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TXU ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT NO. 2

DOCKET NO. 50-446

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 75
License No. NPF-89

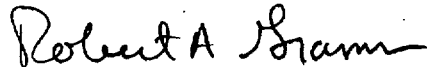
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by TXU Electric Company (TXU Electric) dated January 13, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-89 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 75 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. TXU Electric shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: March 24, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 75

TO FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 75

FACILITY OPERATING LICENSE NO. NPF-89

DOCKET NOS. 50-445 AND 50-446

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3.8-21

3.8-23

3.8-26

Insert

3.8-21

3.8-23

3.8-26

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE

ACTIONS

-----**NOTE**-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel level between 74,600 and 86,000 gal in MODES 1-4 or between 65,600 and 75,000 in MODES 5 & 6 in storage tank.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory less than a level 1.75" below the low static level but greater than a level 5.5" below the low static level of the lube oil dipstick.	B.1 Restore lube oil inventory to within limits.	48 hours

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.3.1	Verify each fuel oil storage tank contains \geq 86,000 gal (MODES 1-4) or 75,000 gal (MODES 5 & 6) of fuel.	31 days
SR 3.8.3.2	<p>-----NOTE-----</p> <p>Not required to be performed until the engine has been shutdown for > 10 hours.</p> <p>-----</p> <p>Verify lubricating oil inventory is \geq a level 1.75" below the low static level on the lube oil dipstick.</p>	31 days
SR 3.8.3.3	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.4	Verify each required DG air start receiver pressure is \geq 180 psig.	31 days
SR 3.8.3.5	Check for and remove accumulated water from each fuel oil storage tank.	31 days

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.4.6 Verify each battery charger supplies ≥ 300 amps at ≥ 130 V for ≥ 8 hours.</p>	<p>18 months</p>
<p>SR 3.8.4.7 -----NOTES-----</p> <ol style="list-style-type: none"> 1. The modified performance discharge test in SR 3.8.4.8 may be performed in lieu of the service test in SR 3.8.4.7. 2. Verify requirement during MODES 3, 4, 5, 6 or with core off-loaded. <p>-----</p> <p>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</p>	<p>18 months</p>

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 75 TO

FACILITY OPERATING LICENSE NO. NPF-87

AND AMENDMENT NO. 75 TO

FACILITY OPERATING LICENSE NO. NPF-89

TXU ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By application dated January 13, 2000, TXU Electric Company (the licensee) requested changes to the Technical Specifications (TSs) for the Comanche Peak Steam Electric Station, Units 1 and 2 (CPSES). The proposed changes would: (1) revise TS 3.8.3 (Condition B and Surveillance Requirement (SR) 3.8.3.2) to increase the required emergency diesel generator (EDG) lube oil inventory values; (2) revise SR 3.8.3.2, for EDG lube oil inventory, to add a note stating that the surveillance is not required to be performed until the EDG has been in shutdown greater than 10 hours; and (3) delete the footnote associated with SR 3.8.4.7 which provided a "one time only" alternative to battery testing requirements.

2.0 BACKGROUND

The EDG Lube Oil System is described in the CPSES Updated Final Safety Evaluation Report. Section 9.5.7.3 states the following with regard to lube oil inventory: "The volume of lubrication oil in the sump is sufficient to insure continued operation under emergency conditions." The Bases for TS 3.8.3 defines the length of the "emergency condition" as seven days. Prior to implementing the current TS requirements for EDG lube oil inventory, the licensee determined that the TS issued as License Amendment 64 to the Facility Operating Licenses for CPSES did not assure that the EDGs were supplied with a seven-day inventory of lube oil.

The current TS associated with EDG lube oil inventory are contained in Condition B of TS 3.8.3. Condition B would apply when "One or more DGs with lube oil inventory less than a level 1 [inch] below the low run level but greater than a level 1 [inch] above the end of the lube oil dipstick," and requires that the lube oil inventory be restored to within limits within 48 hours. SR 3.8.3.2 requires that the licensee "Verify lubricating oil inventory is [greater than or equal to] a level 1 [inch] below the low run level on the lube oil dipstick" every 31 days.

The proposed change to the TS 3.8.3 would increase the EDG lube oil inventory to a seven-day supply and also change the reference points on the lube oil dipstick for use in determining lube oil inventory. The current reference points for TS 3.8.3, Condition B, are the "low run" level and the "end of the lube oil dipstick." For TS 3.8.3, Condition B, the licensee proposes to change the required lube oil level to be between 5.5 inches and 1.75 inches below the "low static level" mark. For SR 3.8.3.2, the licensee proposes to change the reference point/required lube oil level from greater than or equal to 1 inch below the "low run level" to greater than or equal to 1.75 inches below the "low static level." Since the licensee is proposing to use the "low static level" mark on the EDG lube oil dipstick as a reference point for measurement of lube oil inventory, the licensee is also proposing a NOTE in SR 3.8.3.2 that lube oil level measurement is "Not required to be performed until the engine has been shutdown for [greater than] 10 hours." The licensee has indicated that determining lube oil inventory under static conditions (the EDG is shutdown and sufficient time has elapsed to allow oil to drain back into the sump) offers improved accuracy and helps to prevent overfilling of the sump.

The licensee is also proposing to delete the footnote associated with SR 3.8.4.7, NOTE 1, which provided a "one time only" alternative to battery testing requirements. The licensee has already availed itself of this "one time" alternative.

3.0 EVALUATION

With regard to reestablishment of a minimum seven-day lube oil inventory, the Nuclear Regulatory Commission (NRC or the Commission) staff notes that the licensee's proposed TS B 3.8.3, ACTION B.1, Bases indicates that the upper minimum-required upper lube oil level for EDG operability in Condition B (1.75 inches below the low static level on the EDG lube oil dipstick) is based upon a consumption which is suitably conservative compared to the design value. The required lower minimum-required lube oil level for EDG operability in Condition B (5.5 inches below the low static level on the EDG lube oil dipstick) ensures that the EDG starts and the lube oil remains above the point that vortexing occurs for 48-hours before lube oil addition is required. In addition, the use of static measurement of lube oil level provides superior accuracy compared to use of a variance around the "run" mark on the EDG lube oil dipstick. In this regard, the NOTE in SR 3.8.3.2 allows a sufficient period (10 hours) after shutdown of the EDG to establish static conditions for lube oil measurement. Based upon the above, the NRC staff concludes that:

- (1) The proposed TS 3.8.3, Condition B, lube oil level range less than 1.75 inches below the "low static level" but greater than 5.5 inches below the "low static level" of the lube oil dipstick, for restoration of the lube oil level, is acceptable in that it provides a sufficient lube oil supply to maintain operability of the EDG.
- (2) The proposed SR 3.8.3.2 requirement that the lube oil level be verified to be greater than or equal to 1.75 inches below the "low static level" is acceptable in that it assures a seven-day supply of lube oil assuming a conservative consumption rate.
- (3) The proposed NOTE to be added to SR 3.8.3.2 is acceptable in that it allows sufficient time to establish the necessary static conditions for lube oil measurement.

Accordingly, based upon the above, the proposed changes to TS 3.8.3 are acceptable.

Finally, with regard to deletion of the footnote associated with NOTE 1, SR 3.8.4.7, which provided a "one time only" alternative to battery testing requirements, since the licensee has already availed itself of this "one time" alternative, it is no longer needed and its deletion is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 9012, dated February 23, 2000). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: D. H. Jaffe

Date: March 24, 2000