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February 24, 2000

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**  
**REQUEST TO DELAY THE CODE OF RECORD**  
**(1989 EDITION OF ASME CODE, SECTION XI, NO ADDENDA;**  
**UNIT 1 INTERVAL DATES:**  
**AUGUST 13, 1990 - AUGUST 2, 2003, FIRST INTERVAL;**  
**UNIT 2 INTERVAL DATES:**  
**AUGUST 3, 1993 - AUGUST 2, 2003, FIRST INTERVAL)**

After considering the guidance provided in NRC Information Notice 98-44, with respect to 10 year interval(s), TXU Electric requests an approval to delay the update of the Code of Record [ASME Section XI, 1986 Edition, no Addenda] for the Unit 1 Inservice Inspection (ISI) Program until the time of the required update for Unit 2. The second 10-year ISI interval for Unit 1 starts in August 2000. The Code update for the second Unit 2 interval is scheduled for 2003.

In the interim CPSES will be developing a Risk Informed ISI submittal. CPSES will continue with Unit 1 ISI inspections as described below; and will implement the ASME Section XI Appendix VIII requirements in accordance with 10CFR50.55a, and will be subject to any additional ISI related requirements that may be mandated by subsequent NRC rulemaking. Having both units on the same Code of Record provides many implementation benefits which will maintain the existing level of quality and safety and provides cohesive programs for ISI, Repairs/Replacements and Pressure Testing. Having two separate ASME Code years implemented on a two-unit site can create procedural and programmatic differences that could potentially result in implementation errors.

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The Unit 1 ISI inspections will continue with a revised 10-year Program Plan for the second interval that references the same Code of Record used for the first interval, that is, ASME Section XI, 1986 Edition, no Addenda. All required piping and components will be selected, scheduled and examined in accordance with these Code requirements. At the time of the required Unit 2 Code update, the Unit 1 Plan will be revised to implement the updated Code of Record for the remainder of the Unit 1 second inspection interval, which is expected to include the second and third inspection periods in their entirety (approximately 7 years).

This communication contains no new licensing basis commitments regarding CPSES Unit 1. If you have any questions, please contact Mr. Obaid Bhatti at (254) 897-5839.

Sincerely,



C. L. Terry

OAB/oab

cc: E. W. Merschoff, Region IV  
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