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Senior Vice President & Principal Nuclear Officer

CPSES-200100214 Log # TXX-01010 File # 10010, 902.5

January 19, 2001

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
DAM SAFETY INSPECTION RELATED TO THE CATEGORY I
SAFE SHUTDOWN IMPOUNDMENT DAM
(TAC NOS. MB0033 and MB0034)

REF: 1) NRC Letter from David H. Jaffe to C. L. Terry dated October 16, 2000

 TXU Electric Letter, logged TXX-98222, from C. L. Terry to the NRC, dated October 15, 1998 (Response to May 1997 Safe Shutdown Impoundment Dam Inspection)

#### Gentlemen:

On September 5, 1999, an inspection was conducted at the CPSES Safe Shutdown Impoundment Dam. The NRC transmitted a Federal Energy Regulatory Commission (FERC) inspection report which was received by TXU Electric on October 23, 2000 (Reference 1). The NRC requested a written response to four action items identified in Reference 1 within 90 days of receipt of Reference 1. TU Electric's response to the four action items is provided in Attachment 1.

This communication contains updated / new commitments regarding CPSES Units 1 and 2 as identified in Attachment 2.





TXU Electric P.O. Box 1002 Glen Rose, TX 76043

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If you have any questions, please contact Mr. Carl B. Corbin at (254) 897-0121.

Sincerely,

C. L. Terry

By:

Roger D. Walker

Regulatory Affairs Manager

CBC/cbc

Attachments

c - E. W. Merschoff, Region IV
J. I. Tapia, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES

## Item 1 NRC/Federal Energy Regulatory Commission (FERC) Report Finding:

"As the surface rock on the outer shells of the SSID [Safe Shutdown Impoundment Dam] deteriorates, new rock will be required to repair deficient areas. Any new rock should be evaluated for durability and sized for fetch and wave run-up determined from updated design criteria."

TXU Electric Response:



The existing inspection procedure requires us to examine the rock slopes regularly for benching, rock degradation and slope stability. In the future when it becomes necessary to replace the dam riprap or surface rock, engineering will have to evaluate the new replacement rock since the original rock was quarried from quarries that are now under water. The design criteria for the outer shell surface rock (riprap) will also be re-

### Item 2 NRC/FERC Report Finding:

"Piezometers should be tested and evaluated as to the cause of the readings above reservoir levels."





TXU Electric has consulted with Freese and Nichols (F&N), the original architect-engineer for the SSI. F&N has reviewed the piezometer readings determined the readings were suspect. F&N has reviewed the design basis for SSI and verified that, even with the worst case of accuracy for these instruments, the structural integrity of the dam is intact.

Based on discussions with F&N, TXU Electric will evaluate the piezometers to determine if they can be abandonded in place. This evaluation will be completed in 2001.

#### Item 3 NRC/FERC Report Finding:

"Survey base monuments should be checked to ensure the accuracy of the data."

TXU Electric Response:



The SSI Dam base monuments have been checked for accuracy and were found acceptable as previously described item 1 of Attachment 1 of TXU Electric Letter, logged TXX-98222, from C. L. Terry to the NRC, dated October 15, 1998 (Response to May 1997 Safe Shutdown Impoundment Dam Inspection).

# Item 4 NRC/Federal Energy Regulatory Commission (FERC) Report Finding:

"Lastly, the licensee should inspect and / or survey the slopes underwater to ensure the quality of the outer shells of the SSID."

TXU Electric Response:

To determine if there was a problem with benching below the waterline, TXU Electric requested the Texas Water Development Board Hydrologic Monitoring Section to take computer controlled, satellite-located depth readings along the underwater slope of both sides of the dam during the course of their 1997 sedimentation survey (completed after the FERC inspection in May 1997). The results of the survey indicated a uniform underwater slope. Based on these results, no further action is required at this time.

Pan Gillen

Attachment 2 to TXX-98222 Page 1 of 1

This communication contains the following commitments which are one-time actions:

## CDF Number Commitment

In the future when it becomes necessary to replace the dam riprap or surface rock, engineering will evaluate the new replacement rock since the original rock was quarried from quarries that are now under water. The design criteria for the outer shell surface rock (riprap) will also be reevaluated.

Additional piezometer testing was conducted in accordance with guidelines from Freese and Nichols (F&N). This testing determined that the piezometer readings were suspect due to leaking piezometers. In 2001, the piezometers will be evaluated to determine if they can be abandoned in place.

The CDF (Commitment Data Form) number is used by TXU Electric for internal tracking of CPSES commitments.