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CPSES-200101198  
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File # 10120.1

May 17, 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  
RESPONSE TO NRC REGULATORY ISSUE SUMMARY 2001-08

- REF: 1) NRC Regulatory Issue Summary 2001-08, "Operating Reactor  
Licensing Action Estimates," dated April 2, 2001
- 2) Letter from A. Marion, NEI, to M. T. Lesar, NRC, dated  
February 8, 2001

Gentlemen:

Reference 1 requested that all power reactor licensees provide, on a voluntary basis, estimates of the number of new licensing action requests they plan to submit in upcoming fiscal years. Specifically, licensees are requested to provide a simple numerical estimate of the licensing actions expected to be submitted during the remainder of the NRC Fiscal Year (FY) 2001 and in FY 2002 (i.e., submitted by September 30, 2002). Reference 1 also requests licensees identify by brief title those submittals expected to generate complex reviews, particularly any power uprate requests, license renewal requests, license transfer applications, or dry cask storage applications.

Reference 1 defines licensing actions as requests for license amendment, license renewal or transfer, exemption, relief, review of a topical report submitted by a specific licensee, notice of enforcement discretion, or other licensee request requiring NRC review and approval before it can be implemented by the licensee.

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TXU Electric is a participant in an industry consortium of five plants as a result of a mutual agreement known as Strategic Teaming and Resource Sharing (STARS). The STARS group consists of the five plants operated by Wolf Creek Nuclear Operating Corporation, TXU Electric, AmerenUE, Pacific Gas and Electric, and STP Nuclear Operating Company. TXU Electric currently plans to submit 11 new plant specific licensing action requests during the remainder of the NRC FY 2001 and in FY 2002. Through the STARS cooperative effort, TXU Electric is participating in 16 licensing action requests. The number of common STARS group submittals may vary due to some plants already having approval of the licensing action request that the other STARS members are requesting.

TXU Electric is planning a license transfer application based on a corporate reorganization in support of Texas electricity deregulation requirements. TXU Electric currently has no plans to submit any power uprate requests, license renewal requests, or dry cask storage applications through the NRC FY 2002.

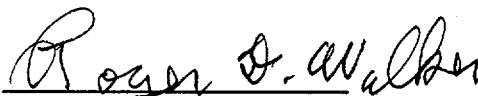
In Reference 1, the NRC states that licensees would "assist the NRC by estimating the potential safety and operational benefits, costs/man-rem averted, or any other economic savings that would be realized by their licensing action requests." This request is based on the proposed voluntary information collection initiative (65 FR 76669, December 7, 2000). The STARS group endorses the comments provided in Reference 2 that the NRC initiative to have licensees estimate benefits and costs is unnecessary and should be withdrawn or modified.

There are no regulatory commitments made in this transmittal.

If you have any questions concerning this response, please contact Bob Dacko at 254-897-0122.

Sincerely,

C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

BSD/bd

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