July 9, 2001

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: RISK-INFORMED INSERVICE INSPECTION APPLICATION FOR COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 (TAC NOS. MB1201 AND MB1202)

Dear Mr. Terry:

By letter dated February 15, 2001 (CPSES-200100449, TXX-01026), you submitted a request for relief from Section XI examination requirements of the American Society of Mechanical Engineers (ASME) Code for inservice inspection (ISI) of Class 1 and 2 piping welds. The proposed alternative of a risk-informed ISI program is to provide an acceptable level of quality and safety in accordance with 10 CFR 50.55a(a)(3)(i).

The enclosed information is needed for the staff to complete its review of your application. To expedite the staff's review to meet the agreed upon schedule, the request for additional information was provided to your staff by an e-mail on or about June 13, 2001, and docketed in a memoranda-to-file dated June 25, 2001 (ADAMS Accession No. ML011650580). Any difference between the enclosed questions and the memo-to-file is editorial. In a call on the questions with your staff, they agreed to submit the responses to the questions by July 20, 2001. If the responses are submitted by that date, the staff expects to issue its evaluation on schedule. If you have any questions, contact Jack Donohew, lead project manager, at 301-415-1307, or at jnd@nrc.gov through the internet.

Sincerely,

/RA/

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

Docket Nos. 50-445 and 50-446

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO.: ML011780473

* E-mail dated June 13, 2001

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OFFICIAL RECORD COPY

Comanche Peak Steam Electric Station

cc:

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REQUEST FOR ADDITIONAL INFORMATION

COMANCHE PEAK STEAM ELECTRIC STATION

RISK-INFORMED INSERVICE INSPECTION

DOCKET NOS. 50-445 AND 50-446

The following are questions on the risk-informed inservice inspection (RI-ISI) submittal dated February 15, 2001 (CPSES-200100449/TXX-01026), for Comanche Peak Steam Electric Station (CPSES):

1. Page 4 of the submittal states that portions of the Unit 1 containment spray and residual heat removal systems contain piping that is less than 0.375 inches thick. It also states that, in response to NRC SSER 26, the licensee committed to performing volumetric examinations on 7.5 percent of the welds in this piping during each ten year interval. The submittal also states that this piping was included in the scope of the RI-ISI application and that this augmented inspection program is subsumed by the RI-ISI program. This appears to be a deviation to the Electric Power Research Institute (EPRI) topical report TR-112657 methodology. Justify the inclusion of these welds within the scope of the RI-ISI program.

2. Page 4 of the submittal states that for CPSES, a deviation to EPRI RI-ISI methodology has been implemented in the failure potential assessment for thermal stratification, cycling and striping (TASCS). Discuss if the revised methodology for assessing TASCS potential is in conformance with the updated criteria described in the EPRI letter to NRC dated March 28, 2001. Also, confirm that as stated in the submittal, once the final EPRI Material Reliability Program (MRP) guidance has been developed, the RI-ISI program will be updated for the evaluation of susceptibility to TASCS, as appropriate.

3. Page 4 of the submittal states that for CPSES Unit 2, 53 percent of the ASME XI examinations have been completed during the first two periods of the first interval and, therefore, 47 percent of the RI-ISI examinations will be performed during the third period so that 100 percent of the selected examinations are performed during the course of the interval. Specify which 47 percent of the RI-ISI examinations will be performed and what will be the basis of the selection.

4. The NRC staff's safety evaluation (SE) issued March 10, 1997, on the CPSES Individual Plant Examination (IPE) states that the staff noted that the licensee credited local repair of various equipment and systems. The staff noted that the credit given to local repair of equipment and systems did not appear to take into account certain plant-specific factors. Page 3 of the submittal states that recovery/repair of failed equipment was addressed in the CPSES 2000 update. Did the modeling of equipment repair in the update take into account plant-specific factors?

5. Page 2 of the submittal states that the evaluation of the consequences of pipe rupture for the RI-ISI assessment for CPSES was based on Revision 1 of the CPSES safety monitor. Page 3 of the submittal discusses the updates made in the CPSES 2000

probabilistic safety assessment (PSA) update for Comanche Peak. Is Revision 1 of the CPSES safety monitor the same as the CPSES 2000 update to the Comanche Peak PSA? If not, what is the relationship between the two?