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C. Lance Terry Senior Vice President & Principal Nuclear Officer

Ref: 10 CFR 50.55a(g)(5)(iii)

CPSES-200101585 Log # TXX-01117 File # 10010.1 905.2

July 11, 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 REQUEST FOR ADDITIONAL INFORMATION REGARDING INSERVICE INSPECTION RELIEF REQUEST - USE OF ASME CODE CASE N-597, RELIEF REQUESTS A-4 FOR UNIT 1 AND A-3 FOR UNIT 2

REF: TXU Electric letter logged TXX-01061 from C. L. Terry to the NRC dated June 21, 2001

Gentlemen:

Via the referenced letter TXU Electric requested an Inservice Inspection relief request for CPSES Units 1 and 2 to use ASME Code Case N-597, "Requirements for Analytical Evaluation of Pipe Wall Thinning, Section XI, Division 1." In the referenced letter TXU Electric stated that, "[T]he Electric Power Research Institute document NSAC 202L, "Recommendations for an Effective Flow Accelerated Corrosion Program," provides specific guidance that is implemented in TXU Electric's Flow Accelerated Corrosion (FAC) procedure STA-730, "Corrosion Monitoring Program." This procedure establishes the required basis for the specific procedures used to calculate wear rates, forecast remaining life, and conduct inspections of FAC degradation at CPSES."



TXX-01117 Page 2 of 3

On or about July 3, 2001, during a telephone conference regarding the use of the subject Code Case N-597 and the implementation of Electric Power Research Institute's (EPRI) guidance document NSAC 202L through the CPSES procedure STA-730, the NRC staff requested that TXU Electric describe the use of terms "Shall" and "Should" used in the CPSES procedure which implements the EPRI NSAC 202L.

As stated via the referenced letter, NSAC 202L provided some of the guidance used in the flow accelerated corrosion program. Although the words of NSAC 202L may have been carried over into the CPSES procedures, their common meaning and understanding were not. Specifically, the meaning and application of the word "should" in the CPSES procedures is consistent with the guidance provided in Station Administrative Manual Procedure STA-202, and not with the common interpretation that may be applicable to the NSAC document. The terms "Shall" and "Should" are defined for global usage in all CPSES controlled procedures. The definitions are as follows:

- Shall used for absolute requirements (normally reserved for regulatory requirements or commitments). If a commitment is to achieve a desired result all procedure steps that describe the process to achieve that result do not have to be shall steps; if the step explicitly meets the commitment, use shall.
- Should used to indicate firm CPSES management expectations. Deviation is a departure from the norm and requires supervisory concurrence. This should be noted in writing which may include logs, procedures, work orders, memos, etc.

From an internal implementation perspective, the use of the word "should" carries the same weight and importance as that of "shall." Therefore, the procedure user should not misconstrue the use of the word "should" as being an activity that may be casually dismissed or waived. The use of these two different terms is simply a mechanism to distinguish actions that have a direct regulation or License commitment basis versus those which do not.



TXX-01117 Page 3 of 3

This communication contains no new licensing basis commitments regarding CPSES Unit 1 and Unit 2. If you have any questions, please contact Obaid Bhatty at (254) 897-5839.

Sincerely,

C. L. Terry

Ullung By: J.Y. Kelley

Vice President Engineering & Support

OAB/ob.

c - E. W. Merschoff, Region IV
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