

August 30, 2001

MEMORANDUM TO: File

FROM: Jack N. Donohew, Senior Project Manager, Section 2  
Project Directorate IV */RA/*  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION FOR  
RISK-INFORMED INSERVICE INSPECTION APPLICATION DATED  
FEBRUARY 15, 2001, FOR COMANCHE PEAK UNITS 1 AND 2  
(TAC NOS. MB1201 AND MB1202)

In the letter of February 15, 2001 (CPSES-200100449/TXX-01026), TXU Electric (the licensee) submitted a relief request to apply a risk-informed inservice inspection (RI-ISI) program for Comanche Peak Steam Electric Station (CPSES).

Attached is the licensee's e-mail providing the responses to the RAI. Attached to the licensee's e-mail is the request for additional information (RAI) from the Materials and Chemical Engineering Branch that was provided to them by e-mail on August 15, 2001. The purpose of the staff's questions was to clarify the licensee's application.

Docket Nos. 50-445 and 50-446

Attachment: E-mail dated August 22, 2001

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Docket Nos. 50-445 and 50-446

Attachment: E-mail dated August 22, 2001

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NRR-106

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NAME	JDonohew:am	EPeyton	SDembek
DATE	8/28/01	8/28/01	8/30/01

DOCUMENT NAME: C:\Program Files\Adobe\Acrobat 4.0\PDF Output\memmb1201.wpd

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E-MAIL DATED AUGUST 22, 2001

**From:** <obaidb@txu.com>  
**To:** "Jack Donohew" <JND@nrc.gov>  
**Date:** 8/22/01 11:52AM  
**Subject:** Re: Additional Questions On CPSES RI-ISI Application

Attached is the [responses] to the additional questions you sent us regarding TXU Electric's RI-ISI application dated 02/15/01 (TXX-01026). If you have any questions or require additional information please contact me.

(See attached file: RI-ISI-R.wpd)

Thanks

Obaid Bhatti  
245-897-5839  
obaidb@txu.com

"Jack Donohew" <JND@nrc.gov> on 08/15/2001 04:22:14 PM

To: Obaid Bhatti/ENERGY/TXU@TU  
cc: "Tom Grozan" <TCG5@pge.com>  
Subject: Additional Questions On CPSES RI-ISI Application

Attached are 3 additional questions that the staff has to clarify the information in the RI-ISI application dated February 15, 2001 (TXX-01026). You may respond by email to me. Do you want a conference call for clarification of the questions? <JND>

**CC:** "Tom Grozan" <TCG5@pge.com>, "Dennis Buschbaum" <dbuschb1@txu.com>, "Ben Mays" <rmays1@txu.com>, "Douglas Snow" <dsnow2@txu.com>

Additional Questions on Comanche Peak RI-ISI submittal:

[This is the first attachment to the Email dated August 22, 2001, which is given above.]

1. Will the RI-ISI program be updated every 10 years and submitted to the NRC consistent with the current 10 CFR 50.55a requirements?
2. Under what conditions will the RI-ISI program be resubmitted to the NRC before the end of any 10-year interval?
3. Page 8 of your submittal presents the criteria for engineering evaluation and additional examinations if unacceptable flaws or relevant conditions are found during examinations. The submittal states that the evaluation will include whether other elements in the segment or segments are subject to the same root cause conditions. The submittal further states that additional examinations will be performed on these elements up to a number equivalent to the number of elements required to be inspected on the segment or segments initially. Please address the following:
  1. Please clarify the term "initially". Specifically, does it refer to inspections planned for the current outage or the current interval?
  2. Please clarify how will the elements be selected for additional examinations. Specifically, please verify that the elements will be selected based on the root cause or damage mechanism and include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements.

**Additional Questions on Comanche Peak RI-ISI submittal:**

[This is the second attachment to the Email dated August 22, 2001, which is given above. This attachment provides the responses. The licensee's responses are in "bold" print.]

1. Will the RI-ISI program be updated every 10 years and submitted to the NRC consistent with the current 10 CFR 50.55a requirements?

**TXU RESPONSE**

**The ISI Program will be updated and submitted to the NRC consistent with regulatory requirements in effect at the time such update is required (currently every 10 years). This may again take the form of a relief request to implement an updated RI-ISI Program depending on future regulatory requirements.**

2. Under what conditions will the RI-ISI program be resubmitted to the NRC before the end of any 10-year interval?

**TXU RESPONSE**

**The RI-ISI Program will be resubmitted to the NRC prior to the end of any 10-year Interval if there is some deviation from the RI ISI methodology described in the initial submittal or if industry experience determines that there is a need for significant revision to the program as described in the original submittal for that Interval.**

3. Page 8 of your submittal presents the criteria for engineering evaluation and additional examinations if unacceptable flaws or relevant conditions are found during examinations. The submittal states that the evaluation will include whether other elements in the segment or segments are subject to the same root cause conditions. The submittal further states that additional examinations will be performed on these elements up to a number equivalent to the number of elements required to be inspected on the segment or segments initially. Please address the following:
  - a. Please clarify the term "initially". Specifically, does it refer to inspections planned for the current outage or the current interval?
  - b. Please clarify how will the elements be selected for additional examinations. Specifically, please verify that the elements will be selected based on the root cause or damage mechanism and include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements.

## **TXU RESPONSE**

- a. In this application, the term “initially” refers to those examinations originally scheduled for the current outage.**
  
- b. Elements selected for additional examinations will be selected based on the root cause or damage mechanism and will include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements. Comanche Peak will revise its procedures for ISI data evaluation and expanded scope examinations to include these requirements.**