



TXU Electric
Comanche Peak
Steam Electric Station
P.O. Box 1002
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lterry1@txu.com

C. Lance Terry
Senior Vice President & Principal Nuclear Officer

CPSES-200102024
Log # TXX-01144
File # 236

Ref. # 10CFR50.80
10CFR50.92

August 31, 2001

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
ADDITIONAL INFORMATION CONCERNING APPLICATION
FOR ORDER AND CONFORMING ADMINISTRATIVE
AMENDMENTS FOR TRANSFER OF LICENSES

- REF: (1) TXU Electric letter logged TXX-01099 from C. L Terry to NRC
"Application For Order and Conforming Administrative Amendments
For Transfer Of Licenses", dated June 19, 2001
- (2) TXU Electric letter logged TXX-01135 from C. L. Terry to NRC
"Revision To Application For Order And Conforming Administrative
Amendments For Transfer Of Licenses", dated August 15, 2001

Gentlemen:

The purpose of this letter is to provide additional information to the NRC Staff following their review of References 1 and 2 above. In the Application submitted with Reference 1, TXU Electric Company ("TXU Electric") requested, pursuant to Section 184 of the Atomic Energy Act of 1954, as amended ("Act"), and 10 CFR § 50.80, that the Nuclear Regulatory Commission ("NRC") consent to the direct transfer of control of TXU Electric's operating authority and 100% ownership interest in the Comanche Peak Steam Electric Station, Units 1 and 2 ("CPSES") on January 1, 2002, to a Texas limited partnership, TXU Genco, TLP. TXU Electric also requested that the NRC issue the required conforming administrative amendments to the CPSES licenses. Reference 2 described a revision to the Application and a revision to the financial statements submitted with the Application.

AP01

TXX-01144

Page 2 of 3

The additional information requested by the NRC Staff is submitted in the following enclosures:

Enclosure 1 "Description Of Revision To The Application" is a redacted version of the proprietary information previously submitted as Enclosure 3 to TXU letter TXX-01135 (Reference 2). The revision description provided in Enclosure 1 may be disclosed to the general public.

Enclosure 2 is an Affidavit of C. L. Terry which requests, on behalf of TXU Electric, that the additional information being provided herein for CPSES in Enclosure 4 be withheld from public disclosure pursuant to 10 CFR § 2.790 because Enclosure 4 contains confidential commercial or financial information which is considered proprietary.

Enclosure 3 provides a non-proprietary version of the additional financial information being provided herein for CPSES in Enclosure 4.

Enclosure 4 provides the additional financial information requested by the NRC Staff for CPSES. This enclosure contains confidential commercial or financial information which is considered proprietary.

The Application, as revised by Reference 2, is otherwise unchanged by this submittal. The original "Safety Analysis" (Attachment 1 of the Application) which includes the "No Significant Hazards" evaluation remains valid.

If NRC requires additional information concerning this license transfer request, please contact Roger D. Walker at TXU Electric, Comanche Peak Steam Electric Station, Post Office Box 1002, A08, Glen Rose, Texas 76043 (Tel: 254-897-8233; fax 254-897-6573; e-mail: rwalker5@txu.com). Service on TXU Electric of comments, hearing requests or intervention petitions, or other pleadings, if applicable, should be made to George L. Edgar at Morgan, Lewis and Bockius, LLP, 1800 M Street, NW, Washington, DC 20036-5869 (Tel: 202-467-7459; fax 202-467-7176; e-mail: gedgar@morganlewis.com).

Sincerely,



C. L. Terry

CLW/clw
Enclosures

TXX-01144

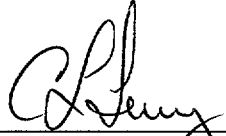
Page 3 of 3

cc: E. W. Merschoff, Region IV (1 copy)
J. A. Clark, Region IV (CLetter & Enclosures 1, 2 and 3)
D. H. Jaffe, NRR (4 copies)
Resident Inspectors, CPSES (CLetter & Enclosures 1, 2 and 3)

Mr. Arthur C. Tate (CLetter & Enclosures 1, 2 and 3)
Division of Compliance and Inspection
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

AFFIRMATION

I, C. L. Terry, being duly sworn, state that I am Senior Vice President & Principal Nuclear Officer at TXU Electric Company ("TXU Electric"), that I am authorized to sign and file this response for additional information concerning the Application with the Nuclear Regulatory Commission on behalf of TXU Electric, and that the statements made and the matters set forth herein are true and correct to the best of my knowledge and belief.



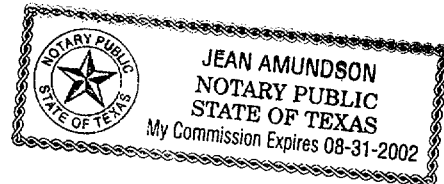
C. L. Terry
Senior Vice President &
Principal Nuclear Officer

STATE OF TEXAS)
)
COUNTY OF *Somewell*)

Subscribed and sworn to before me, a Notary Public, in and for the County and State above named, this 31 day of August, 2001.



Notary Public



LIST OF ENCLOSURES

Enclosure 1 Description of Revision to the Application
(Non-Proprietary Version of Enclosure 3 to TXX-
01135)

Enclosure 2 10 CFR § 2.790 Affidavit of C. L. Terry

Enclosure 3 Comanche Peak Steam Electric Station
Projected Revenues and Expenses
(Non-Proprietary Version)

Proprietary Addendum

Enclosure 4 Comanche Peak Steam Electric Station
Projected Revenues and Expenses
(Proprietary Version)

ENCLOSURE 1

**DESCRIPTION OF REVISION TO THE APPLICATION
(NON-PROPRIETARY VERSION OF ENCLOSURE 3 TO TXX-01135)**

DESCRIPTION OF REVISION TO THE APPLICATION

This revision to the Application involves a proposed change which results in a reduction in the generating assets which may be transferred from TXU Electric to TXU Genco, TLP.

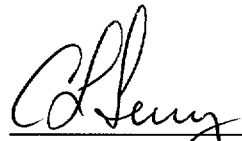
ENCLOSURE 2

10 CFR § 2.790 AFFIDAVIT OF C. L. TERRY

AFFIDAVIT OF C. L. TERRY

I, C. L. Terry, Senior Vice President & Principal Nuclear Officer at TXU Electric Company ("TXU Electric"), do hereby affirm and state:

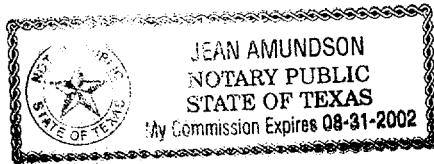
1. I am authorized to execute this affidavit on behalf of TXU Electric.
2. TXU Electric is providing information in support of its Application for Order Consenting to License Transfers and Approving Conforming Administrative License Amendments. The documents being provided in Enclosure 4 contain business plans and financial projections related to the ownership and operation of a TXU Electric generating asset, the Comanche Peak Steam Electric Station, Units 1 and 2 ("CPSES"). These documents constitute proprietary commercial and financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR §§ 2.790(a)(4) and 9.17(a)(4), because:
 - I. This information is and has been held in confidence by TXU Electric.
 - ii. This information is of a type that is held in confidence by TXU Electric and there is a rational basis for doing so because the information contains sensitive financial information concerning the projected revenues and operating expenses of TXU Electric and its successors and affiliates.
 - iii. This information is being transmitted to the NRC in confidence.
 - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - v. Public disclosure of this information would create substantial harm to the competitive position of TXU Electric and its successors and affiliates by disclosing their internal financial projects.
3. Accordingly, TXU Electric requests that the designated documents be withheld from public disclosure pursuant to the policy reflected in 10 CFR §§ 2.790(a)(4) and 9.17(a)(4).



C. L. Terry
Senior Vice President &
Principal Nuclear Officer

STATE OF TEXAS)
)
COUNTY OF *Somervell*)

Subscribed and sworn to before me, a Notary Public, in and for the County and State above named, this 31 day of August, 2001.



Jean Amundson

Notary Public

ENCLOSURE 3

**COMANCHE PEAK STEAM ELECTRIC STATION
PROJECTED REVENUES AND EXPENSES
(NON-PROPRIETARY VERSION)**

COMANCHE PEAK STEAM ELECTRIC STATION
Projected Revenues and Expenses
(Original Power Prices)

	Forecast				
	2002	2003	2004	2005	2006
Capacity Factor (%)					
Capacity (MW)					
Generation (GWh)					
Volume Weighted Wholesale Power Price (\$/MWh)					
Revenue (\$M):					
Power					
Other					
Total					
Expenses (\$M):					
Fuel					
Operations & Maintenance					
Taxes Other Than Income					
Decommissioning					
Total					
NET					

COMANCHE PEAK STEAM ELECTRIC STATION
Projected Revenues and Expenses
(Power Prices Reduced 10%)

	Forecast				
	2002	2003	2004	2005	2006
Capacity Factor (%)					
Capacity (MW)					
Generation (GWh)					
Volume Weighted Wholesale Power Price (\$/MWh)					
Revenue (\$M):					
Power					
Other					
Total					
Expenses (\$M):					
Fuel					
Operations & Maintenance					
Taxes Other Than Income					
Decommissioning					
Total					
NET					

PROPRIETARY ADDENDUM

This Addendum contains Enclosure 4
which contains commercial and proprietary information
exempted from disclosure pursuant to
10 CFR § 2.790

ENCLOSURE 4

**COMANCHE PEAK STEAM ELECTRIC STATION
PROJECTED REVENUES AND EXPENSES
(PROPRIETARY VERSION)**

**Commercial and Proprietary Information
Exempt from Disclosure Pursuant to
10 CFR § 2.790**