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Senior Vice President & Principal Nuclear Officer

Ref: 10CFR50.90

CPSES-200102012  
Log # TXX-01146  
File # 10010, 236

September 10, 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 REQUEST FOR ADDITIONAL  
INFORMATION ON LICENSE AMENDMENT REQUEST 01-05  
(TAC NOS. MB1625 and MB1626)

- REF: 1) TXU Electric Letter, logged TXX-01042, from C. L. Terry to the NRC dated April 5, 2001.
- 2) TXU Electric Letter, logged TXX-01109, from C. L. Terry to the NRC dated June 22, 2001.
- 3) TXU Electric Letter, logged TXX-01130, from C. L. Terry to the NRC dated August 2, 2001.

Gentlemen:

In the referenced letter (Reference 1), TXU Electric submitted a request to amend the CPSES Unit 1 Operating License (NPF-87) and CPSES Unit 2 Operating License (NPF-89) by incorporating changes into the CPSES Units 1 and 2 Technical Specifications and the CPSES Unit 2 Operating License to increase the licensed power for operation of CPSES Units 1 and 2 to 3458 MWt.

TXU Electric provided additional information regarding License Amendment Request 01-05 per References 2 and 3. Attachment 2 supplements the information provided in Reference 2 concerning steam generator tube U-bend fatigue. Furthermore, a commitment is provided regarding LEFM operation for Units 1 and 2.

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In addition to the attached information, the following new commitments will be completed as noted:

Commitment

Number

Commitment

27245

If the LEFM is inoperable while comparing the results of the calorimetric heat balance calculation to the Nuclear Instrumentation System and N-16 Power Monitor channel output during the performance of Technical Specifications Surveillance Requirement 3.3.1.2, the reactor power will be reduced or maintained less than 3411 MWth.

27250

Prior to implementation of the Unit 1 power increase, TXU Electric will determine if any remedial actions are necessary under NRC Bulletin 88-02 as a result of the power uprate to 3458 Mwth. TXU Electric will submit a description of the actions taken to the NRC in the Condition Monitoring Report required by Technical Specification 5.6.10.

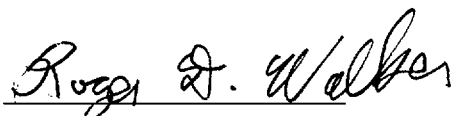
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If you have any questions regarding the attached information, please contact Mr. J. D. Seawright at (254) 897-0140.

Sincerely,

C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

JDS/js

Attachments: 1. Affidavit  
2. Revised response to Question EEIB1 regarding Plant Specific Power Calorimetric Measurement

c - E. W. Merschhoff, Region IV  
J. A. Clark, Region IV  
D. H. Jaffe, NRR  
Resident Inspectors, CPSES

Mr. Aurthur C. Tate  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49<sup>th</sup> Street  
Austin, Texas 78704

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
TXU Electric	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric	)	License Nos. NPF-87
Station, Units 1 & 2)	)	NPF-89

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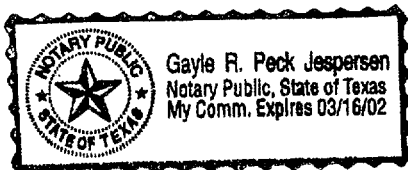
Roger D. Walker, Jr. being duly sworn, hereby deposes and says that he is the Regulatory Affairs Manager of TXU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this Additional Information regarding License Amendment Request 01-05; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

*Roger D. Walker*  
 Roger D. Walker  
 Regulatory Affairs Manager

STATE OF TEXAS            )  
   )  
 COUNTY OF Somervell    )

Subscribed and sworn to before me, on this 10<sup>th</sup> day of September, 2001.

*Gayle R. Peck Jespersen*  
 Notary Public



**ATTACHMENT 2 TO TXX-01146**

**Revised response to Question EEIB1 regarding  
Plant Specific Power Calorimetric Measurement**

**Revised response to Question EEIB1 regarding  
Plant Specific Power Calorimetric Measurement**

An evaluation of the potential for high cycle fatigue rupture of a steam generator tube, similar to that which occurred at North Anna Unit 1, has been performed for Comanche Peak Unit 1. Consistent with the requirements of NRC Bulletin 88-02, the anti-vibration bar configuration of the ruptured tube in North Anna, R9C51 S/G C, is used as the reference case for the tube fatigue usage calculations for Comanche Peak Unit 1. The acceptability of unsupported tubes in the steam generators is based on tube specific analysis relative to the North Anna Unit 1 R9C51 tube, including the relative flow peaking factors. This evaluation was documented in WCAP-15009, Revision 0, "Comanche Peak Unit 1 Evaluation for Tube Vibration Induced Fatigue". The aforementioned topical report was submitted to the NRC via TXU Electric letter, logged TXX-99121, from C. L. Terry to the NRC dated July 21, 1999. Based upon the results of the fatigue analysis, CPSES Unit 1 steam generator tubes except for two tubes in steam generator 3 were shown by calculation not to have the potential to experience high cycle fatigue failure similar to that which occurred at North Anna Unit 1. Those two tubes, R10C109 and R11C109, had cable dampers and plugs installed during the sixth refueling outage (1RF06). As a result of installing these cable dampers and plugs, no additional action were required for these tubes. This completed the actions required by TXU Electric for the steam generators in CPSES Unit 1 as required by NRC Bulletin 88-02.

TXU Electric provides for existing design controls such that updates to stress ratios and fatigue usage calculations are performed in the event there are any significant changes to the SG operations parameters (e.g., steam pressure, flow, circulation ratios) relative to those assumed in the applicable WCAP-15009 analysis for the proposed uprate. Any additional preventive actions that are taken are reported to the NRC via the Reporting Criteria of CPSES Technical Specification Section 5.6.10 and/or NEI 97-06 Rev.1. The tube plugging report and the Condition Monitoring Report identifies the tubes repaired and the probable cause of the damage or anomaly. Prior to implementation of the Unit 1 power increase, TXU Electric will determine if any remedial actions are necessary under NRC Bulletin 88-02 as a result of the power uprate to 3458 Mwth. TXU Electric will submit a description of the actions taken to the NRC in the Condition Monitoring Report required by Technical Specification 5.6.10.