



Ref: EA-02-026

TXU Energy
Comanche Peak Steam
Electric Station
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C. Lance Terry
Senior Vice President & Principal Nuclear Officer

CPSES-200200716
Log # TXX-02058

March 18, 2002

SAFEGUARDS INFORMATION

U.S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
Room 5 D2, Mail Stop O-5 E7
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

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
20 DAY ANSWER TO NRC ORDER FOR INTERIM SAFEGUARDS
AND SECURITY COMPENSATORY MEASURES
EA-02-026**

- REF:**
1. NRC Letter from Samuel J. Collins, Director Office of Nuclear Reactor Regulation to C. Lance Terry, Senior Vice president and Principal Nuclear Officer, Comanche Peak Steam Electric Station dated February 25, 2002
 2. TXU Energy letter (TXX-02059) from C. L. Terry to the U. S. Nuclear Regulatory Commission dated March 18, 2002

Gentlemen:

Via reference 1, the U.S. Nuclear Regulatory Commission (NRC or Commission) issued an Order to TXU Generating Company LP (TXU Energy) that modifies the current operating licenses for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The Order was immediately effective and requires compliance with specific interim safeguards and security compensatory measures as stated in an attachment to the Order.

**NOTICE: Attachment 2 contains "Safeguards Information."
Upon separation of Attachment 2, this letter, including
Attachment 1, are "Decontrolled."**

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

ENCLOSURE CONTAINS SAFEGUARDS INFORMATION,
UPON SEPARATION THIS PAGE IS DECONTROLLED.

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TXX-02058
Page 2 of 3

The Order required a 20 day answer. Attachment 1 to this letter is the 20 day answer for CPSES. Attachment 2 (contains Safeguards Information) is a description of the actions and commitments being taken by CPSES to comply with the Order. Reference 2 is a TXU Energy request for an extension of time to submit an answer and request a hearing on portions of the Order.

This answer is hereby submitted to the Commission in accordance with 10CFR50.4.

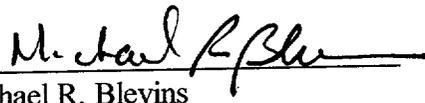
I state under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2002.

Sincerely,

TXU Generation Company LP
By: TXU Generation Management Company LLC,
Its General Partner

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

By: 
Michael R. Blevins
Vice President & Deputy to the Senior Vice President & Principal
Nuclear Officer

TXX-02058
Page 3 of 3

DRW/dw

Attachments:

1. 20 Day Answer to Order
2. Description of actions being taken to comply with Order (Safeguards Information)

c - E. W. Merschoff, Region IV
W. D. Johnson, Region IV (without Attachment 2)
D. H. Jaffe, NRR (without Attachment 2)
Resident Inspectors, CPSES (without Attachment 2)

Secretary, Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

Assistant General Counsel for Materials Litigation and Enforcement
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

20 Day Answer to Order

The NRC order of February 25, 2002, included the following reporting requirements:

- B. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, notify the Commission, (1) if they are unable to comply with any of the requirements described in Attachment 2, (2) if compliance with any of the requirements is unnecessary in their specific circumstances, or (3) if implementation of any of the requirements would cause the Licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall provide the Licensees' justification for seeking relief from or variation of any specific requirement.
2. Any Licensee that considers that implementation of any of the requirements described in Attachment 2 to this Order would adversely impact safe operation of the facility must notify the Commission, within **twenty (20) days** of this Order, of the adverse safety impact, the basis for its determination that the requirement has an adverse safety impact, and either a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, the Licensee must supplement its response to Condition B1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B1.
- C. 1. All Licensees shall, within **twenty (20) days** of the date of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachment 2.
2. All Licensees shall report to the Commission, when they have achieved full compliance with the requirements described in Attachment 2.

TXU Energy Answer

The TXU Energy answer below applies to all Interim Compensatory Measures (ICMs) in the Order except for those for which TXU Energy has requested an extension (see TXU Energy letter TXX-02059 of March 18, 2002). The complete answer for the ICMs, for which TXU Energy has requested an extension, will be provided as described in the extension request letter.

Item B1: TXU Energy is able to comply with and will implement the requirements in Attachment 2 of the Order. A description of TXU Energy's understanding of each requirement and the means by which TXU intends to implement each requirement is provided in Attachment 2 to this answer letter. Implementation of these requirements

will not cause TXU Energy to be in violation of the provisions of the applicable Commission regulations for the facility operating licenses.

Item B2: TXU Energy does not consider that the implementation of the requirements in Attachment 2 to the Order would adversely impact safe operation of CPSES Units 1 and 2.

Item C1: The schedule for achieving compliance with the requirements in Attachment 2 to the Order are in Attachment 2 to this answer letter.

Item C2: TXU Energy will report to the Commission when full compliance with the requirements in Attachment 2 to the Order have been achieved.