



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

Ref: EA-02-026

CPSES-200200717
Log # TXX-02059

March 18, 2002

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
REQUEST FOR EXTENSION OF TIME TO SUBMIT AN ANSWER
AND REQUEST A HEARING 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-02058) 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.

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

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Section IV of the February 25, 2002, Order states that, in accordance with 10 CFR 2.202, a Licensee must submit an answer to the Order and may request an extension of time in which to submit an answer or to request a hearing on the Order within 20 days of the date of the Order. In addition, the Order states “[w]here good cause is shown, consideration will be given to extending the time to request a hearing.”

TXU Energy’s response to conditions B.1, B.2, C.1 and C.2 of the Order is provided in reference 2. For the following reasons, TXU Energy hereby requests an extension of time within which to supplement the answer to the Order and/or to request a hearing.

In a few instances, as detailed in TXU Energy’s answer to the Order (see items B.2.a.(1) and B.2.a.(2) in attachment 2 to reference 2), we are unable, within the required response time, to complete the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be. Because we will be unable to ascertain within 20 days what actions would be appropriate in the context of meeting the NRC’s intent for these measures, we are unable at this time to determine whether it is necessary to request a hearing.

Accordingly, TXU Energy respectfully requests that the time within which to respond to Interim Compensatory Measures B.2.a.(1) and B.2.a.(2) be extended, for supplementing TXU Energy’s response to those items, to twenty days after completing the necessary evaluations and determining the necessary mitigative actions. We estimate that the evaluation and determination of mitigative actions will be completed on or before May 31, 2002. TXU Energy also requests that the time to request a hearing on the Order with respect to Interim Compensatory Measures B.2.a.(1) and B.2.a.(2) be extended to twenty days after TXU Energy completes the necessary evaluations and determines the necessary mitigative actions.

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We would appreciate your written concurrence to this request for extension as soon as practical. If you have any question concerning this matter, please contact me at (254) 897-8920 or Don Woodlan at (254) 897-6887.

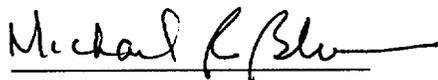
I state under penalty of perjury that the foregoing is true and correct.

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

DRW/dw

c - E. W. Merschoff, Region IV
W. D. Johnson, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES