



TXU Energy
Comanche Peak Steam
Electric Station
P.O. Box 1002 (E01)
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lance.terry@txu.com

C. Lance Terry
Senior Vice President &
Principal Nuclear Officer

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April 29, 2002

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
ENVIRONMENTAL PROTECTION PLAN
ANNUAL ENVIRONMENTAL OPERATING REPORT FOR 2001**

Gentlemen:

Pursuant to Section 5.4.1 of the Environmental Protection Plan (Appendix B to CPSES Unit 1 and Unit 2 Facility Operating License Nos. NPF-87 and NPF-89, respectively), attached is the CPSES Annual Environmental Operating Report for year 2001.

If you have any questions, please contact Mr. Bruce Turner at (254) 897-8901.

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

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

IE25

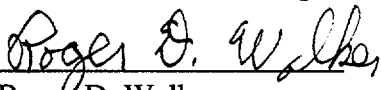
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This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Sincerely,

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

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

By: 
Roger D. Walker
Regulatory Affairs Manager

CLW/clw
Attachment

c - E. W. Merschoff, Region IV w/attch.
W. D. Johnson, Region IV (clo)
D. H. Jaffe, NRR (clo)
Resident Inspectors, CPSES w/attch.

TXU ELECTRIC
COMANCHE PEAK STEAM ELECTRIC STATION
UNITS 1 & 2
2001
ANNUAL ENVIRONMENTAL OPERATING REPORT
(NON-RADIOLOGICAL)
FACILITY OPERATING LICENSE NOS. NPF-87 & 89

I. INTRODUCTION

This report describes implementation of the Environmental Protection Plan (EPP) for the calendar year 2001 as required by Appendix B to Facility Operating License Nos. NPF-87 & 89 for Comanche Peak Steam Electric Station (CPSES) for Units 1 & 2.

During 2001, the CPSES Nonradiological Environmental Monitoring Program was effective in implementing and monitoring all of CPSES's environmental regulatory commitments. Program effectiveness was substantiated by environmental audits conducted in 2001 by in-house compliance visits by TXU Environmental, Health, and Safety and compliance evaluations conducted by the CPSES Nuclear Overview Department. Also, the Texas Natural Resource Conservation Commission (TNRCC) performed a regulatory inspection of CPSES's wastewater management program. One finding was identified pertaining to algae growth on the sewage treatment system clarifier. This finding is being appealed.

II. SCOPE

Section 5.4.1 of the EPP requires that CPSES submit to the NRC an Annual Environmental Operating report that shall address the following environmental protection activities:

- A. Summaries and analyses of the results of the environmental protection activities required by Section 4.2 of the EPP, including a comparison with related preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, a detailed analysis of the data and a proposed course of mitigating action is required. Section 4.2 of the EPP pertains to results from:
 - 1. Groundwater levels and station water use monitoring.
 - 2. Water treatment facility outages impact assessment and reporting.
- B. The report shall also include:
 - 1. A list of EPP noncompliances and the associated corrective actions.
 - 2. A list of all changes in station design and operation, tests, and experiments made in accordance with Subsection 3.1 of the EPP which involved a potentially significant unreviewed environmental question.
 - 3. A list of nonroutine reports submitted in accordance with Subsection 5.4.2 of the EPP.
 - 4. A summary list of National Pollutant Discharge Elimination System (NPDES) permit related reports relative to matters identified in Subsection 2.1 of the EPP which were submitted to the EPA Region VI during the report period. Subsection 2.1 of the EPP pertains to aquatic matters that are addressed by the effluent limitations, and the monitoring requirements contained in the EPA NPDES station wastewater discharge permit.

III. RESULTS OF ACTIVITIES

- A. As required by Subsection 4.2 of the EPP, the following are summaries and analyses of the environmental protection activities during 2001. Based on the results of these activities, there were no observed adverse environmental impacts resulting from plant operation during 2001.

1. Groundwater Pumpage

As indicated in Table 1, groundwater pumpage during 2001 averaged 19.7 gals./min. (gpm) or 10,353,900 total gallons withdrawn for the year. This withdrawal rate represents a 15% decrease from the 2000 average rate of 23.1 gpm. Groundwater withdrawal was highest in January at 26.7 gpm and lowest in October with an average withdrawal rate of 12.0 gpm.

Groundwater withdrawn during 2001 was used primarily for potable and sanitary purposes with only a very small amount used as make-up to the plant fire protection system. No groundwater was used to supplement the station's Surface Water Treatment System.

The average annual pumpage rate of 19.7 gpm for 2001 represents 15.5% of the predicted operational pumpage (127 gpm) identified in Section 3.3 of the Station's Environmental Report - Operational License Stage. This rate also represents approximately 12.5% of the actual average withdrawal rate (158 gpm) reported in the Station's Final Environmental Statement - Operating License Stage (Section 5.3.1.2) of the period 1975 to May 1979.

The combined annual rate for all recorded preoperational groundwater pumpage averaged 68.8 gpm, while the average operational pumpage for the period 1990 through 2001 was 32.3 gpm. Therefore, the average operational rates are 53% less than the groundwater pumpage during the preoperational period. Figure 1 illustrates the annual fluctuation of groundwater withdrawal over the entire preoperational and operational period.

2. Groundwater Levels

As indicated in Table 2, the groundwater level in the on-site observation well OB-3 (intersection of Highway 56 and the Plant Access Road) fluctuated during 2001 from a high level in April of 529.2 ft. Mean Sea Level (MSL) to a low level in August of 521.0 ft. MSL. Overall, the water level in OB-3 during the reporting period (January through December) decreased 0.7 ft. (0.2m).

The 2001 annual average groundwater levels in well OB-3 and OB-4 were 525.4 ft. MSL and 556.8 ft. MSL, respectively. These average levels demonstrated an increase of 0.8 ft. (0.2m) for OB-3 and a decrease of 1.5 ft. (0.5m) for OB-4 from the respective average 2000 levels (Figure 2).

3. Surface Water Treatment System Operation

The station's Water Treatment System processed 193,632,700 total gallons (368.4 gpm) of surface water during 2001 for plant process use. There were no outages during 2001 that required reporting in accordance with Section 4.2.2 of the EPP.

The following is a summary list of monthly surface water usage:

MONTH	SURFACE WATER PROCESSED (GALS.)
JANUARY	18,747,700
FEBRUARY	14,977,000
MARCH	16,311,400
APRIL	18,042,400
MAY	18,314,900
JUNE	15,232,300
JULY	16,588,900
AUGUST	16,414,600
SEPTEMBER	15,052,400
OCTOBER	15,325,100
NOVEMBER	14,845,700
DECEMBER	13,780,300
TOTAL	193,632,700

B. EPP Noncompliance and Corrective Actions - Subsection 5.4.1(1)

There were no noncompliances with the requirements of the EPP during the reporting period.

C. Changes In Station Design or Operation, Tests, and Experiments Made In Accordance With Subsection 3.1 Which Involved A Potentially Significant Unreviewed Environmental Question.

There were no changes in station design, operation, tests or experiments conducted during the reporting period that are reportable under this subsection.

D. Nonroutine Reports Submitted In Accordance With Subsection 5.4.2

There were no nonroutine reports submitted under this subsection.

E. Texas Pollutant Discharge Elimination System (TPDES) Permit-Related Reports Relative To Matters Identified In Subsections 2.1 and 5.4.1

1. Routine monthly Discharge Monitoring Reports (DMR) for all wastewater outfalls were submitted to the Texas Natural Resource Conservation Commission (TNRCC) for each month during 2001. The following is a summary list of correspondence pertaining to DMRs and TPDES permit related documents.

MONTH MONITORED	LOG NUMBER/DATE
JANUARY	TXX-01034 - 02-23-01
FEBRUARY	TXX-02021 - 02-05-02 / "Bio-Monitoring Submission" TXX-01047 - 03-23-01
MARCH	TXX-01069 - 04-25-01
APRIL	TXX-01088 - 05-25-01
MAY	TXX-01106 - 06-25-01
JUNE	TXX-01122 - 07-25-01 TXX-01121 - 07-20-01 / "Bio-Monitoring Submission"
JULY	TXX-01138 - 08-24-01 TXX-01121 - 08-25-01 / "Bio-Monitoring Submission"
AUGUST	TXX-01158 - 09-25-01
SEPTEMBER	TXX-01175 - 10-25-01
OCTOBER	TXX-01185 - 11-21-01
NOVEMBER	TXX-01207 - 12-21-01
DECEMBER	TXX-02012 - 01-25-02

2. There was 1 TPDES wastewater discharge permit noncompliances in 2001. This noncompliance pertains to the exceedance of the fecal coliform limit
3. There were three (3) on-site spills during 2001 that required reporting in accordance with the TNRCC's 24-hour notification requirements.
 - a. March 24, 2001 - This spill resulted when a fork lift accidentally hit and ruptured a 2" Fire Protection lines. Fire Protection water was discharged to Squaw Creek Reservoir (SCR). There were no impacts to SCR. The spill was reported to the TNRCC (see TXX-01059, dated March 29, 2001). SmartForms SMF-000594 and 565 were written to monitor spill.
 - b. June 14, 2001 - This spill resulted when high winds caused sight glass to detach from bulk storage acid tank and allowed a portion of the tank contents (Thrugard 404) to discharge to Circulating Water Intake (CWI) deck. Approximately twenty (20) gallons reached the

SCR shoreline. However, there were no impacts to SCR aquatic life. Spill reported to TNRCC (TXX-01111, dated June 25, 2001).

- c. November 24, 2001 - This spill resulted when a pipe cap ruptured causing a discharge of Fire Protection water. There were no impacts to SCR's aquatic life. The spill was verbally reported to the TNRCC and no written report was required.

TABLE 1
SUMMARY OF GROUNDWATER PUMPAGE
For 2001

MONTH	PLANT WELL 1		PLANT WELL 2		NOSF WELL 1		NOSF WELL 2		TOTALS		NO. OF DAYS BETWEEN READINGS
	Total Gals.	Avg. Gal. Per Min.	Total Gals.	Avg. Gal. Per Min.	Total Gals.	Avg. Gal. Per Min.	Total Gals.	Avg. Gal. Per Min.	Total Gals.	Avg. Gal. Per Min.	
January	1,110,300	24.9	0	0.0	38,000	0.9	44,400	1.0	1,192,700	26.7	31
February	6,900	0.2	1,052,000	26.1	41,600	1.0	36,100	0.9	1,136,600	28.2	28
March	0	0.0	1,010,700	22.6	47,900	1.1	48,600	1.1	1,107,200	24.8	31
April	169,000	3.9	865,700	20.0	6,800	0.2	58,900	1.4	1,100,400	25.5	30
May	685,100	15.3	0	0.0	0	0.0	126,600	2.8	811,700	18.2	31
June	551,900	12.8	0	0.0	0	0.0	134,100	3.1	686,000	15.9	30
July	34,000	0.8	650,700	14.6	0	0.0	159,700	3.6	844,400	18.9	31
August	476,700	10.7	147,600	3.3	0	0.0	156,300	3.5	780,600	17.5	31
September	301,600	7.0	296,600	6.9	0	0.0	88,600	2.1	686,800	15.9	30
October	423,900	9.5	0	0.0	0	0.0	113,000	2.5	536,900	12.0	31
November	758,100	17.5	0	0.0	0	0.0	85,700	2.0	843,800	19.5	30
December	555,100	12.4	0	0.0	0	0.0	71,700	1.6	626,800	14.0	31
TOTAL	5,072,600	9.6	4,023,300	7.8	134,300	0.3	1,123,700	2.1	10,353,900	19.7	365

TABLE 2

**2001 SUMMARY OF GROUNDWATER
LEVELS IN OBSERVATION WELLS**

MONTH	WELL OB-3 (G-3)		WELL OB-4 (G-4)	
	DEPTH (1)	MSL (2)	DEPTH (1)	MSL (2)
January	269.2	524.6	291.0	556.9
February	267.9	525.9	286.4	561.5
March	265.3	528.5	283.2	564.7
April	264.6	529.2	281.6	566.3
May	264.7	529.1	282.4	565.5
June	266.4	527.4	286.5	561.4
July	268.2	525.6	290.1	557.8
August	272.8	521.0	298.5	549.4
September	271.2	522.6	299.3	548.6
October	270.9	522.9	297.3	550.6
November	270.3	523.5	295.7	552.2
December	269.9	523.9	290.9	556.9

ANNUAL GROUNDWATER LEVEL CHANGE FOR 2001:

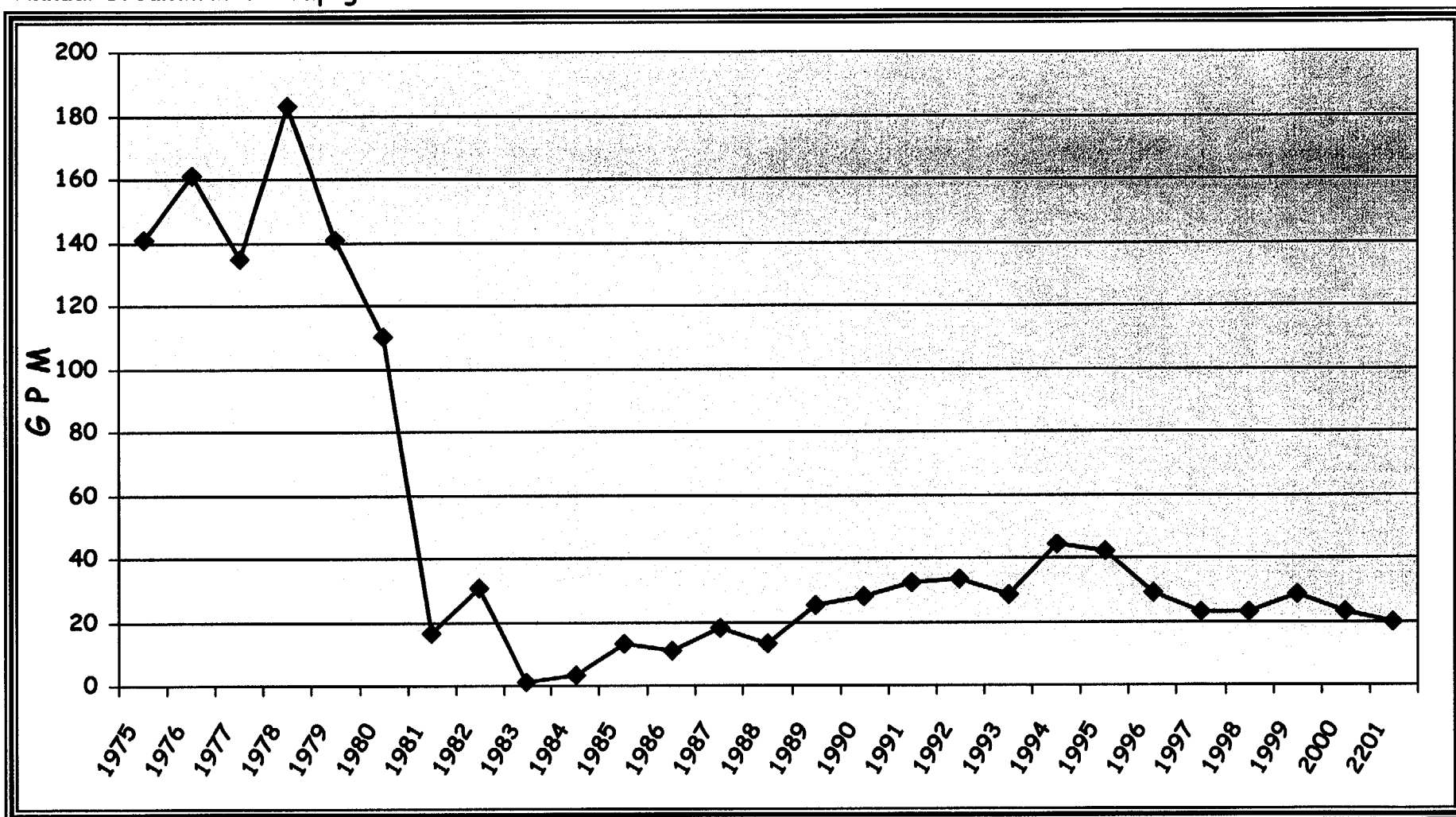
Well OB-3: 269.2 ft. - 269.9 ft = (-)0.7 ft. = (-)0.2m (Decrease)
Well OB-4: 291.0 ft. - 290.9 ft = (-)0.1 ft. = (-)0.03m (Decrease)

NOTES:

- (1) Depth to water table (ft.)
- (2) Water table elevation (ft.) Mean Sea Level (MSL)

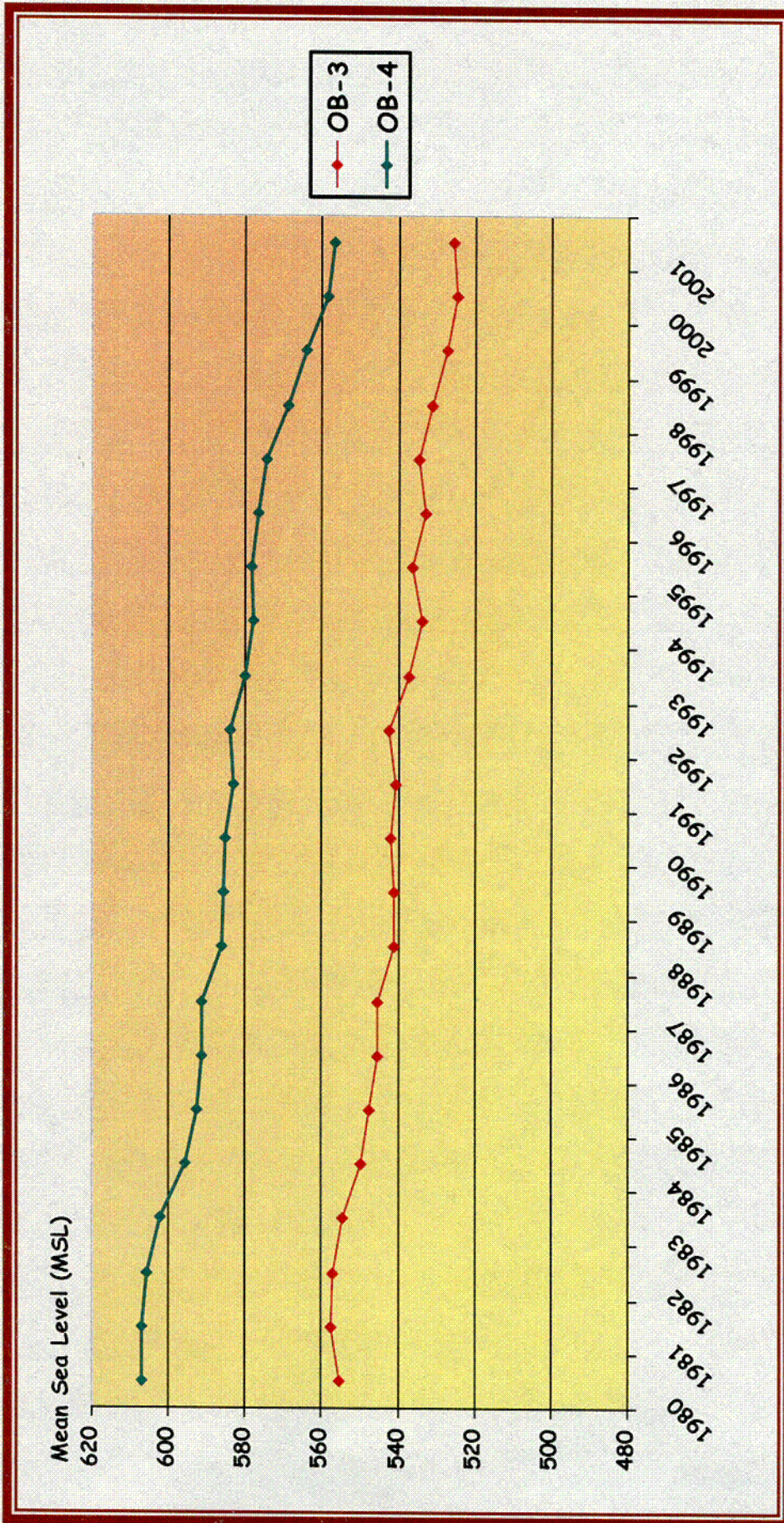
FIGURE 1
SUMMARY OF GROUNDWATER PUMPAGE
1975 THROUGH 2001 (GPM)

Annual Groundwater Pumpage



1. 2/8/90 - Unit #1 Operational. Discontinued using treated surface water for potable use.
2. 2/2/93 - Unit #2 Operational

FIGURE 2
ANNUAL AVERAGE GROUNDWATER LEVEL
1980 through 2001



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