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Comanche Peak Steam
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Ref: 10 CFR 50.55a

CPSES-200202480
Log # TXX-02119
File # 10001

July 11, 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
RELIEF REQUEST A-2, REVISION 2 TO THE UNIT 1 / UNIT 2 INSERVICE TESTING PLAN FOR PUMPS AND VALVES
(1989 EDITION OF ASME CODE, SECTION XI, NO ADDENDA; UNIT 1 INTERVAL START DATE: AUGUST 13, 1990, FIRST INTERVAL; UNIT 2 INTERVAL START DATE: AUGUST 3, 1993, FIRST INTERVAL)

Gentlemen:

Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 are presently in their first ten-year inservice testing interval.

At CPSES inservice tests on pumps and valves are conducted in accordance with the requirements of the 1989 Edition (No Addenda) of the ASME Section XI Code . The 1989 Edition of the Code specifies the duties of the Authorized Nuclear Inservice Inspector (ANII) pertaining to the inservice testing program. However, the 1998 Edition, 2000 Addenda of Section XI eliminates inservice testing as a duty of the ANII due to minimal value added. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), Relief Request A-2 for CPSES Units 1 and 2 is attached for your review and approval to eliminate the ASME Section XI specified requirements for ANII involvement in the inservice testing program for pumps and valves.

A047

TXU Energy requests approval of the proposed Relief Request by December 29, 2002. The approval date was administratively selected to allow for NRC review but the plant does not require this relief to allow continued safe full power operations

Should you have any questions or require additional information, please contact Obaid Bhatty at (254) 897-5839 or Douglas W. Snow at (254) 897-8448.

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

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: Roger D. Walker
Roger D. Walker
Regulatory Affairs Manager

OAB/dws
Attachment

c - E. W. Merschoff, Region IV
W. D. Johnson, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES
G. Bynog, TDLR
J.C. Hair ANII, CPSES

Comanche Peak Steam Electric Station Unit 1 and Unit 2
ASME Section XI Inservice Testing Program
Proposed Use of Subsequent ASME Code Edition and Addenda In Accordance with 10 CFR 50.55a(f)(4)(iv) for Inservice Testing Item(s)
Relief Request No. A-2

1. **ASME Code Component(s) Affected**

Pumps and valves which are tested in accordance with the requirements of the 1989 Edition of the ASME Section XI Code.

2. **Applicable Code Edition and Addenda**

ASME Section XI, IWA-2110, the 1989 Edition, details the duties of the inspector that pertain to inservice tests required on pumps and valves.

3. **Proposed Subsequent Code Edition and Addenda (or Portion)**

TXU Energy proposes to use ASME Section XI, IWA-2110, 1998 Edition 2000 Addenda. Section XI, IWA-2110, the 2000 Addenda to the 1998 Edition eliminates reference to inservice testing (IST) on pumps and valves as a duty of the inspector.

The Authorized Nuclear Inservice Inspectors (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of the ANII relative to the inservice test performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded.

4. **Basis of Using Subsequent Code Editions and Addenda (or Portion)**

The Code requirements specifying the duties of the ANII described in ASME Section XI, IWA-2110 will be eliminated from the IST Program.

The proposed alternative to the specific requirements of ASME Section XI, IWA-2110 is a multi-layered review of the IST Program performed by experienced licensee personnel which will provide an acceptable level of quality and safety. Furthermore, the 2000 Addenda to the 1998 Edition of the Code eliminates inservice testing as a duty of the inspector. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), we request relief from the specific IWA Code requirements identified in this relief request for CPSES Unit 1 and Unit 2.

The Authorized Nuclear Inservice Inspector's (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of ANII relative to the inservice test(s) performed for pumps and valves and component supports as simply

4. Basis of Using Subsequent Code Editions and Addenda (or Portion) (cont)

verifying that inservice tests have been performed and the results recorded. In general, ANIIs do not have the training or background experience to make determinations about component safety functions in order to verify program scope, or to assess the operational readiness of components based on test results. Consequently, the ANII review provides little benefit.

Comanche Peak Steam Electric Station (CPSES) has a multi-layered review process that performs the same functions as the ANII noted above but with individuals who have extensive experience in the Code-required testing of pumps and valves. Also, the IST Program is subject to the CPSES Quality Assurance Program that provides an equivalent, or greater level of quality and safety than the requirements for ANII involvement specified in the Code. Therefore, there is no quality-related benefit in the ANII duplicating the review efforts performed by station personnel.

5. Duration of Proposed Request

For the remainder of the term of the operating licenses for CPSES Unit 1 and Unit 2.

6. Precedents:

a. NRC letter dated May 22, 2002 to Mr. David A. Christian subject: Surry Power Station Units 1 and 2 Re: ASME Section XI Inservice Testing (IST) Program Relief Request (TAC Nos. MB3798 and MB3799).