



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

Ref: 10 CFR 50.55(a)(3)

CPSES-200203345  
Log # TXX-02170  
File # 10010

September 24, 2002

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-445; RELIEF REQUESTS A-3, A-4 Rev 1, AND A-5  
Rev 1 TO THE UNIT 1 INSERVICE INSPECTION (ISI) FROM 1986  
EDITION OF ASME CODE, SECTION XI, NO ADDENDA  
(INTERVAL START DATE: AUGUST 13, 2000, SECOND  
INTERVAL)**

**REF: 1) TXU Energy letter to the NRC dated July 18, 2002 logged TXX-02129**

Dear Sir or Madam:

Pursuant to 10CFR50.55a, TXU Energy hereby requests NRC approval of the attached relief requests. The reliefs from the ASME Code are being requested for the second interval of the inservice inspection program. The details of the 10CFR 50.55a request are enclosed.

Via reference 1, the relief requests (A-3, A-4, and A-5) proposed deferral of certain examinations (see attachments for details) until the end of the interval and to invoke Code Case N-307-3 for relief A-5. During telephone conference with your staff TXU Energy requested to modify its relief requests. The modifications to Reference 1 are as follows:

- For Relief Request A-4; added the statement that, when leakage of borated water is detected, a VT-3 examination will be performed in accordance with IWA-5250(a)(2).
- For Relief Request A-5; remove utilization of ASME Code Case N-307-3.

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This transmittal via its attachments submits relief requests A-3, A-4 Rev. 1, and A-5 Rev. 1 for your review and approval by October 4, 2002.

This communication contains no new licensing basis commitments regarding Comanche Peak Steam Electric Station (CPSES) Unit 1.

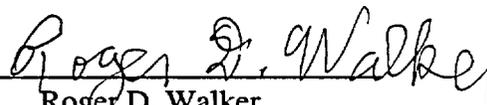
If you have any questions or need additional information regarding this matter, please feel free to contact Obaid Bhatti at (254) 897-5839 or Douglas W. Snow at (254) 897-8448.

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  
Regulatory Affairs Manager

OAB/dws

Attachments

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

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-3**

**PROPOSED ALTERNATIVE PURSUANT TO 10 CFR 50.55a(a)(3)(i)**

**-ALTERNATIVE PROVIDES ACCEPTABLE LEVEL OF QUALITY  
AND SAFETY-**

**IV. System/Component for Which Relief is Requested:**

American Society of Mechanical Engineers (ASME) Section XI, "Rules for Inservice Inspection Nuclear Power Plant Components", Category B-A Pressure Retaining Welds In Reactor Pressure Vessel (RPV), Item No. B1.30 shell-to-flange weld. The subject weld is depicted as weld number TBX-1-1100-1 in the Comanche Peak Steam Electric Station Unit 1 ISI Program Plan.

**II. Code Requirement:**

ASME Section XI, Rules for Inservice Inspection of Nuclear Power plant Components 1986 Edition, No addenda, Subsection IWA-2232, requires volumetric examination of the RPV-to-flange weld to be in accordance with ASME Code, Section V, Article 4.

Additionally, according to the 1986 Edition of the ASME Section XI Table IWB-2500-1 for category B-A, Item No. B1.30 complete deferral of the volumetric inspection to the end of the interval is not permissible.

**III. Code Requirement from Which Relief is Requested:**

TXU Energy requests relief from the requirements of the 1986 Edition of the ASME Section XI Table IWB-2500-1 for category B-A, Item No. B1.30. In particular, the partial deferral of the inspection.

**IV. Proposed Alternative:**

TXU Energy proposes to defer the partial inspection of the subject weld and perform 100 percent of the subject inspection at the end of the current interval for Comanche Peak Steam Electric Station Unit 1 RPV shell-to-flange weld.

This relief is requested to allow the use of a Performance Demonstration Initiative (PDI) qualified procedure to complete the UT examination of the RPV vessel-to-flange weld from the vessel side of the weld, in accordance with ASME Section XI, Div. 1, 1995 Edition, 1996 Addenda, Appendix VIII, Supplement 4 and 6, at or near the end of the current interval.

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-3**

**PROPOSED ALTERNATIVE PURSUANT TO 10 CFR 50.55a(a)(3)(i)**

**-ALTERNATIVE PROVIDES ACCEPTABLE LEVEL OF QUALITY  
AND SAFETY-  
(Continued)**

**V. Basis of Alternative for Providing Acceptable Level of Quality and Safety:**

The subject weld has been examined during the pre-service inspection, and a 100 percent examination of weld TBX-1-1100-1 was performed during the last interval. There were no recordable indications identified by the volumetric examinations. Therefore, TXU Energy believes that the examinations performed provide adequate confidence that there are no matters of concerns regarding the structural integrity of the subject welds.

TXU Energy is proposing to use a remote examination at or near the end of the current interval. To perform this volumetric examination, TXU Energy will be utilizing personnel, procedures, and equipment demonstrated and qualified by PDI and in accordance with ASME Section XI, Div. 1, 1995 Edition, 1996 Addenda, Appendix VIII. Although [currently] Appendix VIII is not a requirement for this weld, the qualification process to Appendix VIII criteria demonstrates that the examination and evaluation techniques are equal or surpass the requirements of paragraph IWA-2232, "Ultrasonic Examination" of Section XI of the ASME Code and the guidance in RG 1.150.

The PDI qualified sizing method is considered more accurate than the method used in ASME Section V, Article 4. The proposed alternate UT examination technique provides an acceptable level of quality and examination repeatability as compared to the Article 4 requirements.

**VI. Duration of Proposed Alternative:**

This relief is requested for the second 10-year interval examination for the Comanche Peak Steam Electric Station Unit 1.

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-4 R-1**

**PROPOSED USE OF SUBSEQUENT ASME CODE EDITION AND ADDENDA  
PURSUANT TO 10 CFR 50.55a(g)(4)(iv)**

**I. System/Component for Which Relief is Requested:**

ASME Class I Reactor Pressure Vessel (RPV) Flange Ligaments. The subject item is depicted as TBX-1-1100- LIG in the Comanche Peak Steam Electric Station Unit 1 ISI Program Plan.

**V. Applicable Code Edition and Addenda:**

ASME Section XI, "Rules for Inservice Inspection of Nuclear Power plant Components 1986 Edition, No addenda, Table IWB-2500-1 for category B-G-1, Item No. B6.40, Threads in Flange.

**VI. Code Requirement from Which Relief is Requested:**

Relief is requested from the 1986 Edition of the ASME Section XI Table IWB-2500-1 for category B-G-1, Item No. B6.40, Threads in Flange. This aforementioned Edition of the Code states that the deferral of inspection to the end of the interval is not permissible.

TXU Energy requests relief from the above stated requirement of the 1986 Edition of the ASME Section XI Table IWB-2500-1 for category B-G-1, Item No. B6.40, Threads in Flange, and requests deferral of this inspection to the end of the interval.

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

TXU Energy proposes to use 1995 Edition, 1996 Addenda of the ASME Section XI Table IWB-2500-1 for category B-G-1, Item No. B6.40, Threads in Flange, and requests deferral of this inspection to the end of the interval as permitted. However, when leakage of borated water is detected a VT-3 examination will be performed in accordance with IWA-5250(a)(2) as required by ASME Section XI.

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

The NRC staff incorporated these changes by reference in 10 CFR 50.55a(b). The changes to Table IWB-2500-1, Item No. B6.40 examination criteria do not affect other parts of the Code. The change does not eliminate the examination or the required number of ligament examinations; it only provides the option for consolidating the number of ligaments examined at any one time. Additionally, the volumetric examinations will be performed with procedures and personnel qualified in accordance with ASME Section XI, Appendix VIII as required by 10 CFR 50.55a(g)(6)(ii)(C). Therefore, the proposed change will result in an acceptable level of quality and safety.

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-4 R-1**

**PROPOSED USE OF SUBSEQUENT ASME CODE EDITION AND ADDENDA  
PURSUANT TO 10 CFR 50.55a(g)(4)(iv)  
(Continued)**

**VI. Duration of Proposed Alternative:**

This relief is requested for the second 10-year interval examination for the Comanche Peak Steam Electric Station Unit 1.

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-5 R-1**

**PROPOSED USE OF SUBSEQUENT ASME CODE EDITION AND ADDENDA  
PURSUANT TO 10 CFR 50.55a(g)(4)(iv)**

**I. System/Component for Which Relief is Requested:**

ASME Class 1 Reactor Pressure Vessel (RPV) Closure Head Nuts, Washers, and Studs. The subject items are depicted as TBX-1-1400-1 through 54 in the Comanche Peak Steam Electric Station Unit 1 ISI Program Plan.

**II. Applicable Code Edition and Addenda:**

ASME Section XI, "Rules for Inservice Inspection of Nuclear Power plant Components 1986 Edition, No addenda, Table IWB-2500-1 for category B-G-1, Reactor Vessel Parts.

**III. Code Requirement from Which Relief is Requested:**

TXU Energy requests relief from the 1986 Edition of the ASME Section XI Table IWB-2500-1, Category B-G-1 for the following:

- 1) Table IWB-2500-1 disallowing deferral for Items B6.20, "Closure Studs, In Place", and B6.50, "Closure Washers, Bushing".

**IV. Proposed Subsequent Code Edition and Addenda and Code Case:**

TXU Energy proposes to use 1995 Edition, 1996 Addenda of the ASME Section XI Table IWB-2500-1 for category B-G-1, Item No. B6.40, Threads in Flange, and requests deferral of this inspection to the end of the interval as permitted.

**V. Basis of Using Subsequent Code Editions and Addenda and Code Case:**

The 1995 Edition, 1996 Addenda of the ASME Section XI allows the deferral of the aforementioned items to the end of the interval. The NRC staff incorporated these changes by reference in 10 CFR 50.55a(b). The changes to Table IWB-2500-1 examination criteria do not affect other parts of the Code. Moreover, the change does not eliminate the examination or the required number of examinations; it only provides the option for consolidating the number of items examined at any one time. Additionally, the volumetric examinations will be performed with procedures and personnel qualified in accordance with ASME Section XI, Appendix VIII as required by 10 CFR 50.55a(g)(6)(ii)(C). Therefore, the proposed change will result in an acceptable level of quality and safety.

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-5 R-1**

**PROPOSED USE OF SUBSEQUENT ASME CODE EDITION AND ADDENDA  
PURSUANT TO 10 CFR 50.55a(g)(4)(iv)  
(Continued)**

**VI. Duration of Proposed Alternative:**

This relief is requested for the Comanche Peak Steam Electric Station Unit 1, second 10-year interval.