



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

Ref: 10 CFR 50.55(a)(3)

CPSES-200203451  
Log # TXX-02175  
File # 10010

October 1, 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-5 Rev 2 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  
2) TXU Energy letter to the NRC dated September 24, 2002  
logged TXX-02170

Dear Sir or Madam:

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

Via reference 1 & 2, 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 were submitted in TXX-02170; however, during a telephone conference it was determined that a clarification was necessary for A-5 Rev 1. The clarification is as follows:

A047

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- For Relief Request A-5; Clarify Section IV as follows:

TXU Energy proposes to use 1995 Edition, 1996 Addenda of the ASME Section XI Table IWB-2500-1 for category B-G-1, B6.20, "Closure Studs, In Place", and B6.50, "Closure Washers, Bushing", and requests deferral of this inspection to the end of the interval as permitted.

Deferrals for scheduling purposes will be utilized, provided a 10-year maximum duration is not exceeded between examinations. A "re-zeroing" of examinations will be necessary if the 10-year maximum duration is exceeded between examinations.

This transmittal via its attachments submits relief request A-5 Rev. 2 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.

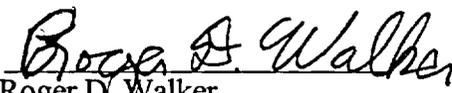
If you have any questions or need additional information regarding this matter, please feel free to contact Obaid Bhatti at (254) 897-5839 or Douglas W. Snow at (254) 897-8448.

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

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

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

**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, B6.20, "Closure Studs, In Place", and B6.50, "Closure Washers, Bushing", and requests deferral of this inspection to the end of the interval as permitted.

Deferrals for scheduling purposes will be utilized, provided a 10-year maximum duration is not exceeded between examinations. A "re-zeroing" of examinations will be necessary if the 10-year maximum duration is exceeded between examinations.

**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-2**

**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.