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CPSES-200203746
Log # TXX-02105

November 14, 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
SAFE SHUTDOWN IMPOUNDMENT DAM

REF: 1) NRC Letter from David H. Jaffe to C. Lance Terry dated November 26, 2001 (Related to Safe Shutdown Impoundment Dam Inspection on March 21, 2001)

2) TXU Electric Letter, logged TXX-01010, from C. L. Terry to the NRC dated January 19, 2001 (Related to Safe Shutdown Impoundment Dam Inspection on September 5, 1999)

3) NRC Letter from David H. Jaffe to C. Lance Terry dated March 9, 2001 (Response to Reference 2)

Gentlemen:

On March 21, 2001, an inspection was conducted at the CPSES Safe Shutdown Impoundment (SSI) Dam. On December 4, 2001, TXU Energy received a letter (Reference 1) from the NRC forwarding results of the March 21, 2001, SSI Dam inspection. Reference 1 indicated that there were no conditions observed that would be an immediate threat to the safety of the SSI Dam and that CPSES should be prepared to discuss the inspection findings and necessary follow-up actions during the next SSI Dam inspection.

With respect to the SSI piezometers finding identified in Reference 1, TXU Energy indicated (in Reference 2) that an evaluation of the piezometer readings would be completed in 2001 (Commitment # 27164). In March 2001, the NRC issued a letter (Reference 3) to TXU Energy indicating that TXU Energy's actions were responsive to the findings/follow-up actions related to the SSI Dam. The piezometer evaluation

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was not completed until September 2002 (see discussion in Attachment 1).

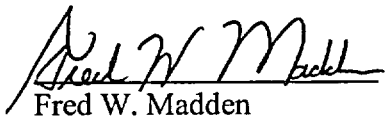
TXU Energy's response to the specific findings and necessary follow-up actions in Reference 1 are provided in Attachment 1. This communication contains updated/new commitments regarding CPSES Units 1 and 2 as identified in Attachment 2.

If you have any questions please contact Carl B. Corbin at (254) 897-0121.

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: 
Fred W. Madden
Nuclear Licensing Manager

CBC/cbc

Attachments

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

FERC Item 1 - Rip-Rap replacement:

"Since the SSID outer shell surface rock is slowly deteriorating, in order to help in scheduling repairs, it would be advantageous to have a geologist determine the rate of deterioration and the amount of deterioration the rock has sustained since the dam was constructed 1977."

CPSES Response to Item 1:

TXU Energy believes that past reviews and ongoing annual reviews have adequately addressed this issue and will continue to monitor the conditions of the rip rap to assure that the integrity of the SSI dam is not affected. The existing rip rap is expected to be adequate for several more years.

In the future when it becomes necessary to replace the dam riprap or surface rock, engineering will evaluate the new replacement rock since the original rock was quarried from quarries that are now under water. The design criteria for the outer shell surface rock (riprap) will also be re-evaluated.

FERC Item 2 - Piezometer readings erratic:

"Prior to conducting the proposed SSID stability study, Freese and Nichols should submit for NRC review the scope of the study, and the study parameters and how they were determined, and the acceptable criteria."

CPSES Response to Item 2:

Reference 1 transmitted the latest FERC inspections report for the SSI Dam inspection in March 2001. In that report under the Section "Specific Findings and Necessary Follow-up Actions," FERC indicated that "Prior to conducting the proposed SSID stability study, Freese and Nichols should submit for NRC review the scope of the study, the study parameters and how they were determined, and the acceptable criteria."

CPSES Engineering had already initiated the Freese and Nichols study prior to the receipt of the FERC request (Reference 1) noted above, and therefore was not able to transmit the information requested above prior to conducting the study.

During phone conversations with the NRC staff on May 21, 2002, TXU Energy indicated a preference to finalize the Freese and Nichols study and send a letter to the NRC which would address the "Specific Findings and Necessary Follow-up Actions" of the FERC inspection report

(Reference 1). The letter would also indicate that the piezometer study was completed in 2002, not in 2001 as previously stated in the January 2001 letter. The NRC staff indicated that it was acceptable to complete the Freese and Nichols study and for TXU Energy to submit a letter to addressing the specific findings and follow-up actions.

The Freese and Nichols SSI Dam Piezometer Evaluation was completed on September 28, 2002. The study concluded that the piezometers have little future usefulness for monitoring or evaluating the safety of the dam. The study was unable to postulate any unsafe condition in the dam that has a significant likelihood of occurring and that might be detected by monitoring the piezometer readings. The piezometers could be abandoned without significant impact on the dam safety program. However, since they exist and are in good condition, it is reasonable to continue to read them as a general precaution. If the dam is subjected to some drastic event or change, the piezometer data may prove useful. They will be more meaningful and credible if there is a continuous record available for comparison.

Therefore, since the piezometers are functional and producing data the piezometers will continue to be maintained and read annually.

The F&N Evaluation will be available on site for your review at the next SSI Dam inspection.

FERC Item 3 - Underwater dam slope uniformity:

"TXU and the NRC should determine the frequency of the underwater inspections."

CPSES Response to Item 3:

The first underwater inspection of the slope uniformity occurred approximately 18 years after the SSI was constructed and filled. The inspection revealed a uniform under water slope. TXU will perform the next underwater inspection of the SSI Dam slopes in 2017, and every 20 years thereafter.

This communication contains the following updated and new commitments::

Commitment Number	Commitment Description
27163	In the future when it becomes necessary to replace the dam riprap or surface rock, engineering will evaluate the new replacement rock since the original rock was quarried from quarries that are now under water. The design criteria for the outer shell surface rock (riprap) will also be re-evaluated. **Comments:** This commitment was previously described in TXU Energy letter dated January 19, 2001, and has not changed.
27164	In September 2002, a Freese and Nichols evaluation determined that the piezometers are functional and producing data, therefore they will continue to be maintained and read annually. **Comments:** The evaluation was completed in 2002, not 2001 as previously indicated in TXU Energy letter dated January 19, 2001. This commitment is now closed.
27275	TXU will perform the next underwater inspection of the SSI Dam slopes in 2017, and every 20 years thereafter. **Comments:** This commitment will be incorporated into the SSI dam surveillance program prior to the next SSI Dam inspection currently scheduled during the summer of 2003.