



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

Ref: EA-02-261
10CFR73.21

CPSES-200300217
Log # TXX-03021

January 27, 2003

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

U.S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
Room 5 D2, Mail Stop O-5 E7
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
20 DAY ANSWER TO NRC ORDER FOR COMPENSATORY
MEASURES RELATED TO ACCESS AUTHORIZATION
EA-02-261

REF: 1. NRC Letter from Samuel J. Collins, Director Office of Nuclear
Reactor Regulation to C. Lance Terry, Senior Vice President and
Principal Nuclear Officer, Comanche Peak Steam Electric Station
dated January 7, 2003

Gentlemen:

Via reference 1, the U.S. Nuclear Regulatory Commission (NRC or Commission)
issued an Order to TXU Generating Company LP (TXU Energy) that modifies the
current operating licenses for Comanche Peak Steam Electric Station (CPSES), Units
1 and 2. The Order was immediately effective and requires compliance with specific
compensatory measures associated with access authorization as stated in an
attachment to the Order.

The Order required a 20 day answer. Attachment 1 to this letter is the 20 day answer
for CPSES.

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

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

DO29

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This answer is hereby submitted to the Commission in accordance with 10CFR50.4.

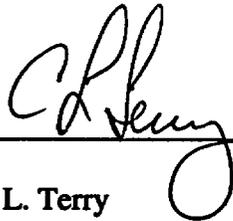
I state under penalty of perjury that the foregoing is true and correct.

Executed on January 27, 2003.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner



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

NSH/nh

Attachments:

1. 20 Day Answer to Order
- c - E. W. Merschoff, Region IV
W. D. Johnson, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES

20 Day Answer to Order

The NRC order of January 7, 2003, included the following reporting requirements:

A All Licensees shall, comply with the requirements described in Attachment 2 to this Order except to the extent that a more stringent requirement is set forth in the Licensee's security plan. The Licensees shall immediately begin implementation of the requirements in Attachment 2 to the Order and shall complete implementation no later than July 7, 2003, with the exception of:

- **compensatory measure B.1.1 which shall be implemented no later than April 7, 2003 and,**
- **C.1.6 and C.1.8 which shall be completed no later than January 7, 2004.**

B. 1. All Licensees shall, within twenty (20) days of the date of this Order, notify the Commission, (1) if they are unable to comply with any of the requirements described in Attachment 2, (2) if compliance with any of the requirements is unnecessary in their specific circumstances, or (3) if implementation of any of the requirements would cause the Licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall provide the Licensees' justification for seeking relief from or variation of any specific requirement.

2. Any Licensee that considers that implementation of any of the requirements described in Attachment 2 to this Order would adversely impact safe operation of the facility must notify the Commission, within twenty (20) days of this Order, of the adverse safety impact, the basis for its determination that the requirement has an adverse safety impact, and either a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, the Licensee must supplement its response to Condition B1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B1.

C. 1. All Licensees shall, within twenty (20) days of the date of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachment 2.

2. All Licensees shall report to the Commission, when they have achieved full compliance with the requirements described in Attachment 2.

TXU Energy Answer

The TXU Energy answer below applies to all Compensatory Measures (CMs) identified in the Order. TXU Energy will be able to comply with the requirements of Attachment 2 of the Order. Implementation Schedule for Attachment 2 to NRC Order EA-02-261 dated January 7, 2003 is as follows:

CM	Title	Required Compliance Date	Planned Implementation Date
B	Unescorted Access Authorization Measures		
B.1.1	Alternative Method For Access	April 7, 2003	April 7, 2003
B.1.2	Access Categories	July 7, 2003	July 7, 2003
B.1.3	Verify True Identity	July 7, 2003	July 7, 2003
B.1.4	Initial Unescorted Access	July 7, 2003	July 7, 2003
B.1.5	Updated Unescorted Access	July 7, 2003	July 7, 2003
B.1.6	Psychological Evaluation	July 7, 2003	July 7, 2003
B.1.7	Reinstated Access	July 7, 2003	July 7, 2003
C.1.1	Implement Common Vehicle (PADS)	July 7, 2003	July 7, 2003
C	Access Authorization Program Measures		
C.1.2	Access Denial Data Entry	July 7, 2003	July 7, 2003
C.1.3	Personnel Follow-up at Other Plants	July 7, 2003	July 7, 2003
C.1.4	10CFR26 Violation Notification	July 7, 2003	July 7, 2003
C.1.5	Denied Access Actions	July 7, 2003	July 7, 2003
C.1.6	Conduct Re-investigations	January 7, 2004	January 7, 2004
C.1.7	Screening of BI Screeners	July 7, 2003	July 7, 2003
C.1.8	Enhance Behavioral Observation	January 7, 2004	January 7, 2004
C.1.9	Access Audit Program	July 7, 2003	July 7, 2003
C.1.10	Management of Personnel Information	July 7, 2003	July 7, 2003