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Ref: 10CFR50.90

CPSES-200300278
Log # TXX-03022
File # 00236

February 5, 2003

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
SUPPLEMENTAL INFORMATION TO LICENSE AMENDMENT
REQUEST (LAR) 02-11, REVISION OF OPERATING LICENSE,
APPENDIX B, ENVIRONMENTAL PROTECTION PLAN**

REF: 1) TXU Energy Letter logged TXX-02198 from C. L. Terry to U. S. Nuclear Regulatory Commission, "License Amendment Request (LAR) 02-11, Revision of Operating License , Appendix B Environmental Protection Plan," dated November 19, 2002.

Gentlemen:

The purpose of this letter is to document TXU Generation Company LP's (TXU Energy's) response to a NRC request for additional information.

In a telephone conference call on January 9, 2003, TXU Energy provided the NRC with additional information in response to questions on the requested changes of License Amendment Request (LAR) 02-11 (Reference 1). LAR 02-11 involves a revision to the CPSES Operating Licenses, Appendix B, "Environmental Protection Plan (EPP)." TXU Energy agreed to formally provide the following information to supplement LAR 02-11.

The NRC had questions concerning the proposed change to EPP Section 4.2.2, "Water Treatment Facility Outages Impact Assessment and Reporting" and how it may relate to their evaluation of the CPSES Final Environmental Statement (FES).

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The questions relate to groundwater use rates, the CPSES surface water treatment system, and reporting of water treatment system outages.

The NRC's questions and TXU Energy's answers are as follows:

NRC Question 1:

“If the water treatment system is out for more than 24 hours, what is its backup?”

TXU Energy Response:

Since the issuance of the FES in 1981, CPSES has installed a demineralizer water storage tank and a filtered water storage tank onsite. Each of these tanks are about 450,000 gallons capacity. These tanks provide a backup capability for supply to the surface water treatment system and would be sufficient for several days at the current average usage. Additionally, TXU Energy would consider calling in a contracted mobile water treatment service, depending on outage conditions, duration, etc. TXU Energy has contracted such temporary services in the past.

Groundwater does not have suitable quality to be used “untreated” as make-up to the plant. The piping interconnection tie between the plant make-up water system (supplied by surface water) and the plant's potable water system (supplied by groundwater) originally served two purposes : (1) to allow groundwater to serve as a back-up water source for plant construction needs, and (2) to allow treated surface water to serve as a backup source of water to the plant's potable water system. As a result of changes in the early 1990's with respect to the federal and state Drinking Water Standards, i.e., requirements for more extensive treatment and monitoring for those potable water systems being supplied from surface waters, it was no longer feasible for CPSES to use surface water to supplement the potable water system and the interconnection between the two systems was eliminated. Therefore, in the current plant configuration, it is no longer possible to supply groundwater to the plant makeup water system.

CPSES currently only uses groundwater as a supply to the potable water system, and the average annual groundwater use rate has been under 30 gpm for the past several years (see Attachment 1, graph on historical CPSES ground water use as taken from the 2002 Annual Environmental Protection Plan Report).

NRC Question 2: “How can they avoid using groundwater?”

TXU Energy Response: See answer above for Question 1.

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In addition to providing the above information, during the telephone call TXU Energy expressed a desire to slightly alter the clarifying wording previously proposed via Reference 1 for the change to Section 4.2.2 of the EPP. The alternative wording proposed herein (applicable for both Operating Licenses) is provided in Attachment 2 to this letter. TXU Energy believes this alternative wording enhances the intended clarification of EPP Section 4.2.2. The alternative does not change the conclusion of the existing "No Significant Hazards Analysis" for LAR 02-11.

Should you have any questions, please contact C. L. Wilkerson at (254) 897-0144.

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

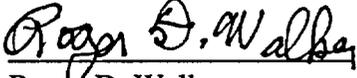
Executed on February 5, 2003.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner

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

By: 
Roger D. Walker
Regulatory Affairs Manager

CLW/clw
Attachments

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

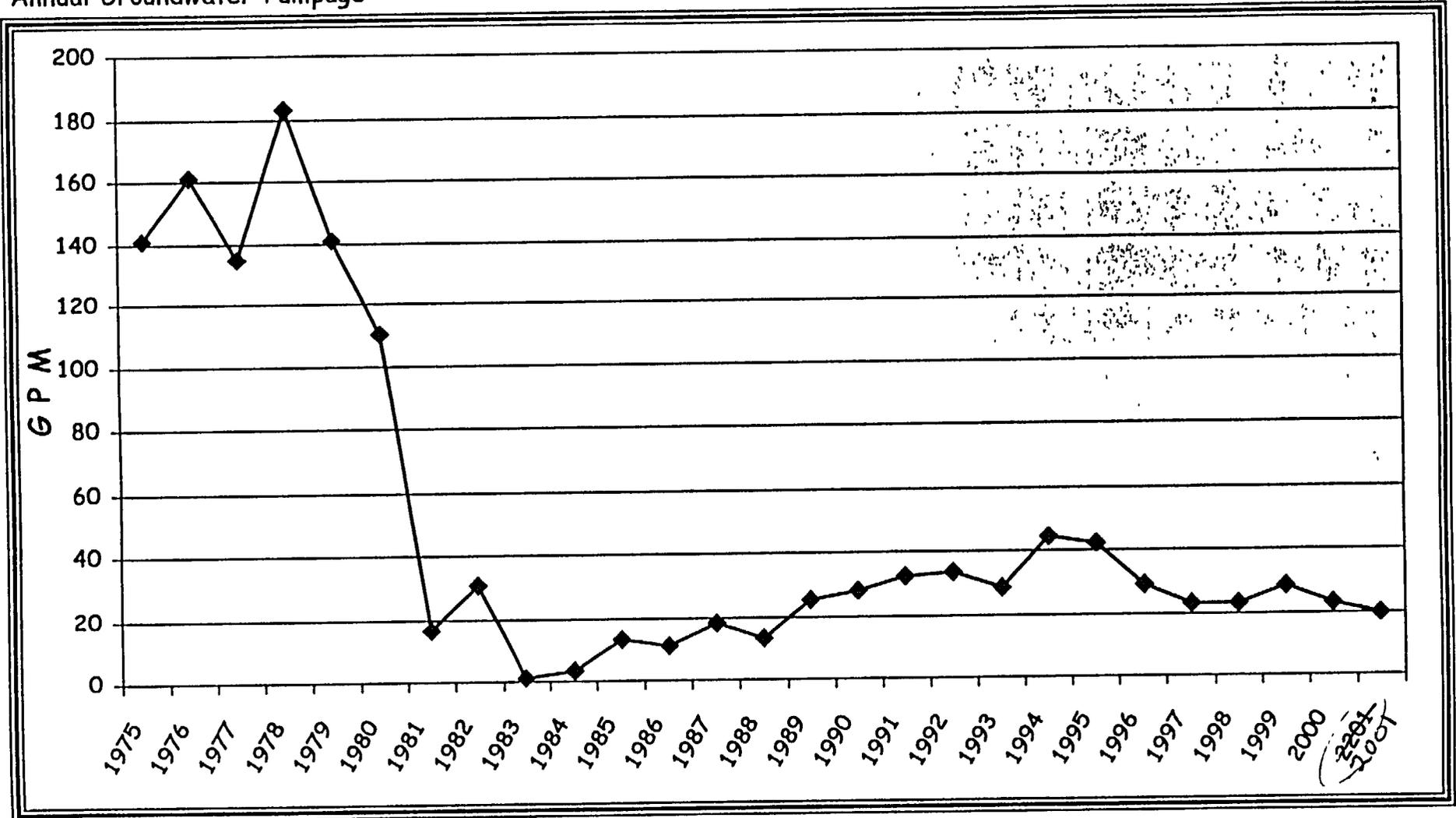
Mr. Authur C. Tate
Bureau of Radiation Control
Texas Department of Public Health
1100 West 49th Street
Austin, Texas 78704

Attachment 1 to TXX-03022

(Summary of CPSES Groundwater Pumpage - 1975 Through 2001)

FIGURE 1
SUMMARY OF GROUNDWATER PUMPAGE
1975 THROUGH 2001 (GPM)

Annual Groundwater Pumpage



1. 2/8/90 - Unit #1 Operational. Discontinued using treated surface water for potable use.
2. 2/2/93 - Unit #2 Operational

Attachment 2 to TXX-03022

(Alternative Proposed Wording Change to Operating Licenses NPF-87 and NPF-89, Appendix B, Environmental Protection Plan, Section 4.2.2 “Water Treatment Facility Outages Impact Assessment and Reporting”)

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours, followed by a written report per Subsection 5.4.2. The following are examples of such events: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Groundwater Levels and Station Water Use Monitoring

Groundwater levels in the onsite observation wells identified as OB-3 and OB-4 in the FES-OL (Figure 4-3) shall be monitored and recorded monthly when the groundwater pumpage rate by CPSES is less than or equal to 30 gallons per minute (gpm) and weekly when the CPSES average monthly rate exceeds 30 gpm for the previous month. Water levels shall be read and recorded on approximately the same day of the month when monitoring monthly and on the same day of the week when monitoring weekly (an aid in interpreting the results by minimizing the influence of cyclic water use patterns of the aquifer by others on the observed water levels).

A monthly record of the total number of gallons pumped from each of the onsite production wells shall be maintained, including an average monthly pumpage rate in gpm.

A monthly record showing the rate and total amount of surface water processed by the onsite water treatment facility shall be maintained by the licensee on a monthly basis. This record shall include the process rate in gallons per minute and the total amount in gallons.

The licensee shall include the results of this monitoring program as part of the Annual Operating Report (see Subsection 5.4.1).

4.2.2 Water Treatment Facility Outages Impact Assessment and Reporting

The following outages of the onsite water treatment facility shall be reported to the NRC if groundwater is used to supplement the supply of treated surface water during the outage:

- (1) Routine or unplanned outages that exceed 30 consecutive days.
- (2) Any outage of at least 24 hours duration, beginning with the third such outage in a calendar year, if these outages are accompanied by an increase in the monthly average groundwater pumpage to a rate exceeding 30 gpm. When it is determined that either routine or unplanned outages will exceed 30 consecutive days and when the groundwater pumpage rate will be greater than 30 gpm when averaged over the outage period, the licensee will prepare and submit a report to the NRC within 15 days