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

Ref: 10 CFR 50.55a(g)(5)(iii)

CPSES-200300305
Log # TXX-03009

February 14, 2003

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 B-2 AND C-4 FOR THE UNIT 1 INSERVICE INSPECTION (ISI) FROM 1986 EDITION OF ASME CODE, SECTION XI, NO ADDENDA (INTERVAL START DATE: AUGUST 14, 2000, SECOND INTERVAL)

TXU Generation Company LP (hereafter referred to as TXU Energy) has determined that certain inspection requirements of ASME Section XI are impractical, and is requesting relief pursuant to 10 CFR 50.55a(g)(5)(iii) (See Attachments 1 and 2).

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

If you have any questions regarding this request, please contact Obaid Bhatty at (254) 897-5839 or Douglas W. Snow at (254) 897-8448.

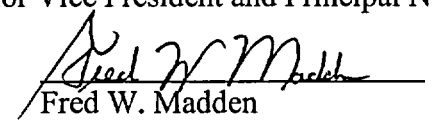
A047

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

DWS/dws
Attachment

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
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. C-4

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY

I. System/Component for Which Relief is Requested:

Chemical and Volume Control (CVCS) Pump TBX-CSAPCH-01. ASME Class 2 Integrally Welded Pump Attachments.

Weld No. TBX-2-3110-3WS
Weld No. TBX-2-3110-4WS

II. Code Requirement from Which Relief is Requested:

Comanche Peak Unit 1 is currently required to perform inservice examinations of selected welds in accordance with the requirements of 10 CFR 50.55a, and the 1986 Edition with no Addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components. The subject welds are described in Table IWC-2500-1, Examination Category C-C, Code Item B3.30, Figures IWC-2500-5, and requires surface examination of these welds.

Pursuant to the requirements of 10 CFR 50.55a(g)(5)(iii), relief is requested from performing the required 100 percent surface examination.

III. Impracticality of Compliance:

The examination coverage is limited due to interferences from the housing seal and pump base plate. Therefore, the Code required 100 percent surface examination by liquid penetrant method can not be achieved. Best effort examination resulted in coverage of approximately 77 percent of the area. It is impractical to obtain coverage of 100 percent required by the Code for each of the subject welds unless the CVCS Pump is redesigned to improve access to the welds.

IV. Burden Caused by Compliance:

The examination coverage is limited by area geometries of the CVCS pump housing seal and pump base plate, as indicated via the attached sketches on pages 3 and 4. These conditions make 100 percent examination impractical for these welds. To gain access for examination would require a design modification. Imposition of this requirement would be a significant burden on TXU Energy.

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. C-4

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY

V. Proposed Alternative and Basis for Use:

There are no proposed alternatives. TXU has examined a significant portion of these welds, obtaining approximately 77 percent of the required volumetric examination coverage. There was one recordable indication, which was a 7/32 inch rounded indication, identified by the liquid penetrant surface examination for Weld No. TBX-2-3110-4WS. This indication remained unchanged from the previous examination that was reported for the same weld in 1993, during the first 10-year interval for Unit 1. Based on this amount of coverage, it is reasonable to conclude that degradation, if present, would have been detected.

Therefore, TXU Energy believes that the examination performed provides adequate confidence that there are no matters of concern regarding the structural integrity of the subject welds.

Granting of this relief request will not have an impact on plant quality or safety and will not adversely impact the health and safety of the public.

VI. Duration of Proposed Alternative:

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

VII. Precedents:

1) TXU Energy letter logged TXX-93107 dated March 15, 1993. NRC response dated November 29, 1994, reference TAC NO. M83125.

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. C-4

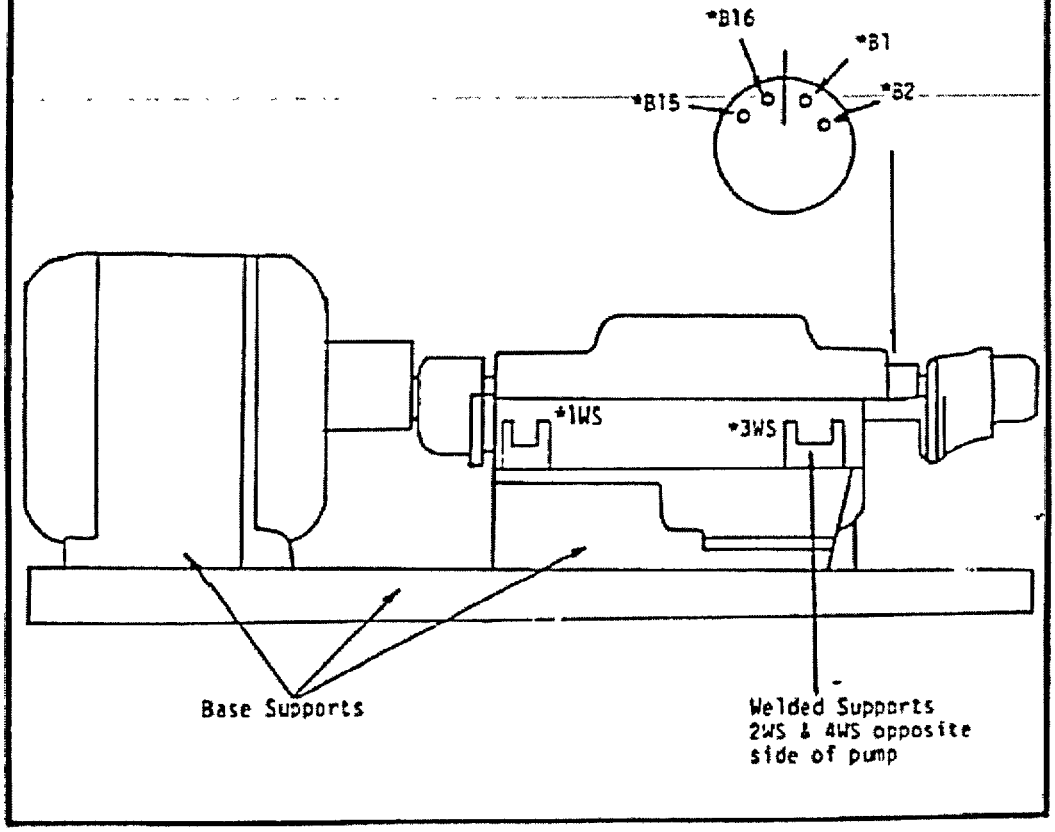
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY

ILLUSTRATIVE ONLY

DESCRIPTION: CENTRIFUGAL CHARGING PUMPS 1 AND 2	TU ELECTRIC CPSES UNIT 1		
APPROVAL: [signature] 6-6-90	TBX-2-3110	REV. 1	7-23-90

Pump Casing Welds: Not Applicable
Bolting: 16 - 1.625" Diameter
Integrally Welded Supports: 4
Support Components: 4 Welded Supports and Base Supports
0 Reference: Centerline of Pump Bolting

Note*: Pump Designation precedes Item Identification



TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. C-4

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii) -INSERVICE INSPECTION IMPRACTICALITY

TXU

WESTINGHOUSE NUCLEAR SERVICES DIVISION
INSPECTION SERVICES
SURFACE EXAMINATION DATA

REPORT NO 19PT-05
PAGE 1 OF 1

PLANT COMANCHE PEAK UNIT 1 SKETCH TBX-2-3110

SYST/COMP CENTRIFUGAL CHARGING PUMP PROCEDURE TX-ISI-11, Rev. 7

EXAMINER Larry M. Musgrave LEVEL II DATE 09/28/02

EXAMINER Michael W. Julison LEVEL II DATE 09/28/02

PT	BATCH NUMBERS	MT	
CLEANER	Magnaflux SKC-S 97H12K	YOKE	N/A COIL N/A
PENETRANT	Magnaflux SKL-SP 97K07K	EXAM MEDIUM	N/A
DEVELOPER	Magnaflux SKD-S2 94J03K	BLACK-LIGHT	N/A
REMOVER	Magnaflux SKC-S 97H12K	CHECK TIME	N/A
SURFACE THERMOMETER	TU 2361	SURFACE THERMOMETER	N/A

COMPONENT ID	RESULTS	REMARKS	LIMITATON	TEMP °F
1WS	NRI	2-1/16" Rounded Indications separated by less than 1/16".	NONE	86°
		This indication unchanged from previous inspection		
		Reference Indication Data Sheet dated 10/31/92, Indication #2.		
2WS	NRI	A 1/32" Rounded Indication on bracket bottom 3/8" in from West	NONE	86°
		end ¼" from toe of weld.		
3WS	NI	23% not examined. See Limitation to Examination Data Sheet.	YES	86°
4WS	NRI	A 3/32" Rounded Indication 0.1" from weld toe on 4 WS	YES	86°
		This Indication unchanged from previous Inspection.		
		Reference Indication Data Sheet dated 10/31/92.		
		23% not examined. See Limitation to Examination Data Sheet.		

TU ELECTRIC REVIEW / DATE	TU ELECTRIC LEVEL III REVIEW / DATE	ANII REVIEW / DATE
Paul M Pendergrass 10-15-02	J. Ragan 10/19/02	10/19/02

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. C-4

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY

WESTINGHOUSE NUCLEAR SERVICE DIVISION
INSPECTION SERVICES

LIMITATION TO EXAMINATION

PLANT Comanche Peak UNIT No.1 SKETCH TBX-2-3110, Rev. 1

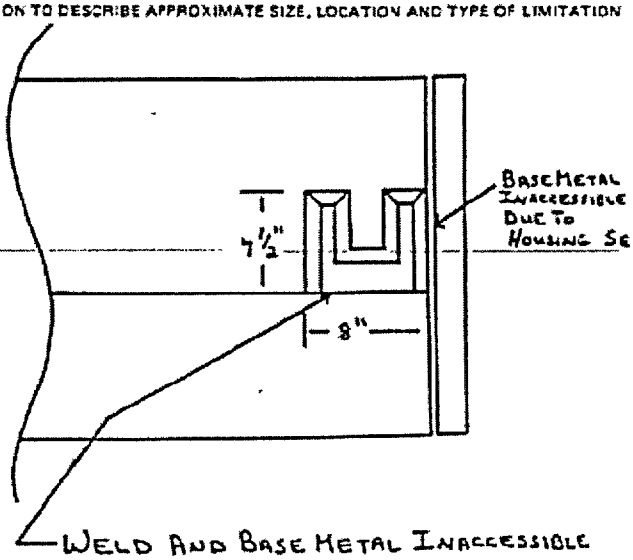
SYST/COMP Centrifugal Charging Pump 1 PROCEDURE TX-IST-11, Rev. 3, E.C. 1

EXAMINER [signature] LEVEL II DATE 10-31-92

Barry M. Musgrave 9-28-02

RELATED TO U/T ____ P/T X M/T ____ V/T ____ ITEM(S) 3WS + 4WS

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION



TYPICAL 3WS + 4WS

23% Of Required Volume Not Examined Of 3WS+4WS

jlt 11/9/92

F49077

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY-

I. System/Component for Which Relief is Requested:

Relief is requested for the following Class 1 piping welds in the Reactor Coolant System (Pressurizer Relief), Category B-J, Item B9.21, 1986 Edition with no Addenda of ASME Section XI:

Weld No. TBX-1-4502-12
Weld No. TBX-1-4502-28

II. Code Requirement from Which Relief is Requested:

10 CFR 50.55a(b)(2)(xv)(A) states that when applying Supplement 2 to Appendix VIII, the following examination coverage criteria requirements must be used:

(1) Piping must be examined in two axial directions and when examination in the circumferential direction is required, the circumferential examination must be performed in two directions, provided access is available.

(2) Where examination from both sides is not possible, full coverage credit may be claimed from a single side for ferritic welds. Where examination from both sides is not possible on austenitic welds, full coverage credit from a single side may be claimed only after completing a successful single sided Appendix VIII demonstration using flaws on the opposite side of the weld.

III. Impracticality of Compliance:

10 CFR 50.55a(b)(2)(xvi)(B) requires that

> Examinations performed from one side of a ferritic or stainless steel pipe weld must be conducted with equipment, procedures, and personnel that have demonstrated proficiency with single side examinations. To demonstrate equivalency to two sided examinations, the demonstration must be performed to the requirements of Appendix VIII as modified by this paragraph and Sec. 50.55a(b)(2)(xv)(A).

The Final Rule (67FR60520) requires that if access is available, the weld shall be scanned in each of the four directions (parallel and perpendicular to the weld) where required. Coverage credit may be taken for single side exams for ferritic piping. However, for austenitic piping, a procedure must be qualified with flaws on the inaccessible side of the weld. There are currently no qualified single side examination procedures that demonstrate equivalency to two-sided examination procedures on austenitic piping welds. Current technology is not capable of reliably detecting or sizing flaws on the far side of an austenitic weld for configurations common to US nuclear applications.

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY-

The Performance Demonstrative Initiative (PDI) Program conforms to the Final Rule regarding single side access for piping. PDI Performance Demonstration Qualification Summary (PDQS) certificates for austenitic piping list the limitation that single side examination is performed on a best effort basis. The best effort qualification is provided in place of a complete single side qualification to demonstrate that the examiners qualification and the subsequent weld examination is based on application of the best available technology.

When the examination area is limited to one side of an austenitic weld, examination coverage does not comply with 10 CFR 50.55a(b)(2)(xv)(A) and proficiency demonstrations do not comply with 10 CFR 50.55a(b)(2)(xv)(B) and full coverage credit may not be claimed.

Pursuant to the requirements of 10 CFR 50.55a(g)(5)(iii), relief is requested from performing the required examination as required by 10 CFR 50.55a(b)(2)(xv)(A).

IV. Burden Caused by Compliance:

Imposition of the Code Requirements would require significant system redesign, modifications, and an increase in personnel radiation exposure.

V. Proposed Alternative and Basis for Use:

The best available techniques, as qualified through the Performance Demonstrative Initiative for Supplement 2 (67FR60520) with demonstrated best effort for single side examination, were used from the accessible side of the weld.

These two welds were the only welds identified in the line segments per the RI-ISI Program which met the considerations for system design, the risk analysis, previous examinations, and NDE accessibility.

Therefore, TXU Energy believes that the examination performed provides adequate confidence that there are no matters of concern regarding the structural integrity of the subject welds. And no changes are expected in the overall level of plant safety.

Granting of this relief request will not have an impact on plant quality or safety and will not adversely impact the health and safety of the public.

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

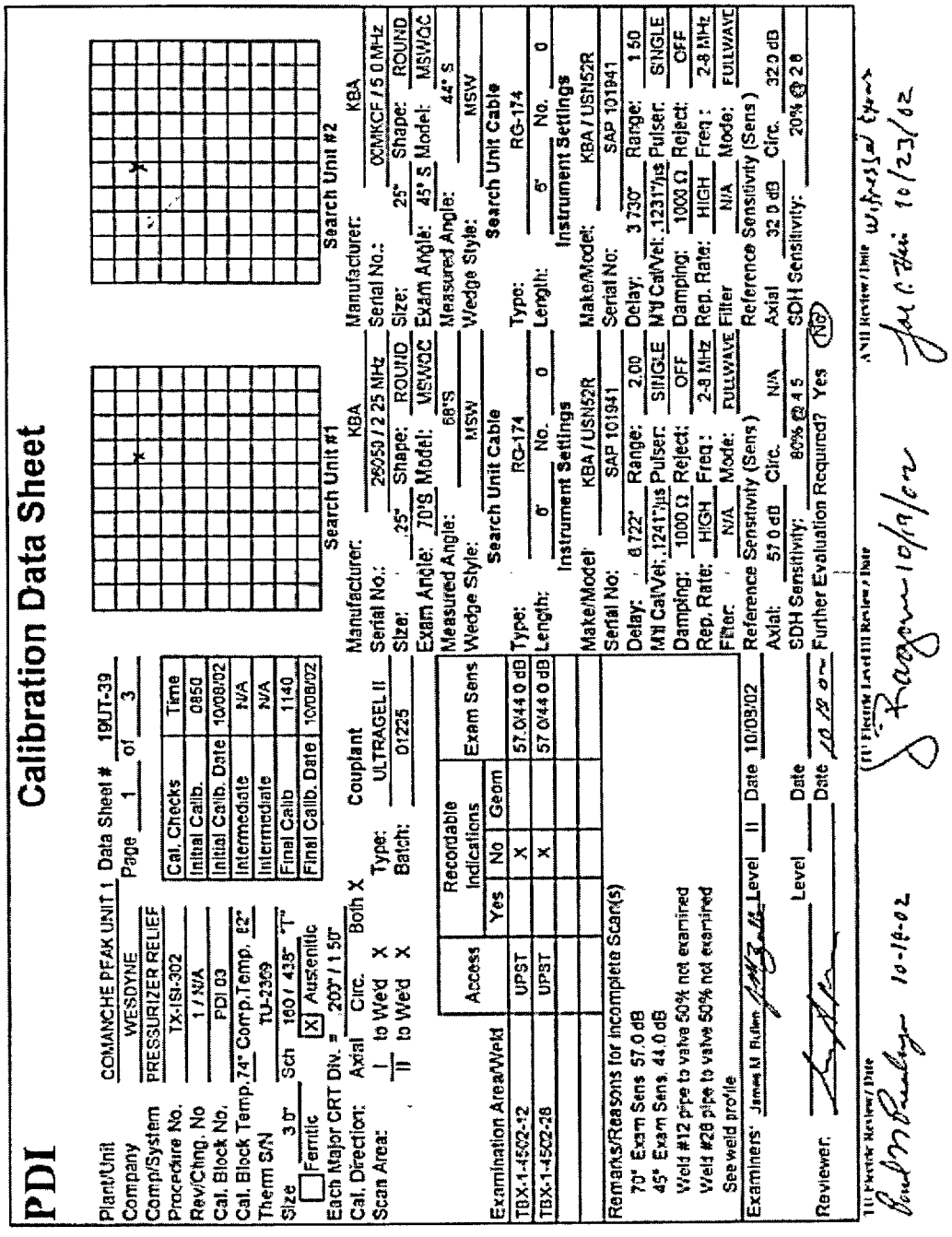
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY-

VI. Duration of Proposed Alternative:

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

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY-



TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

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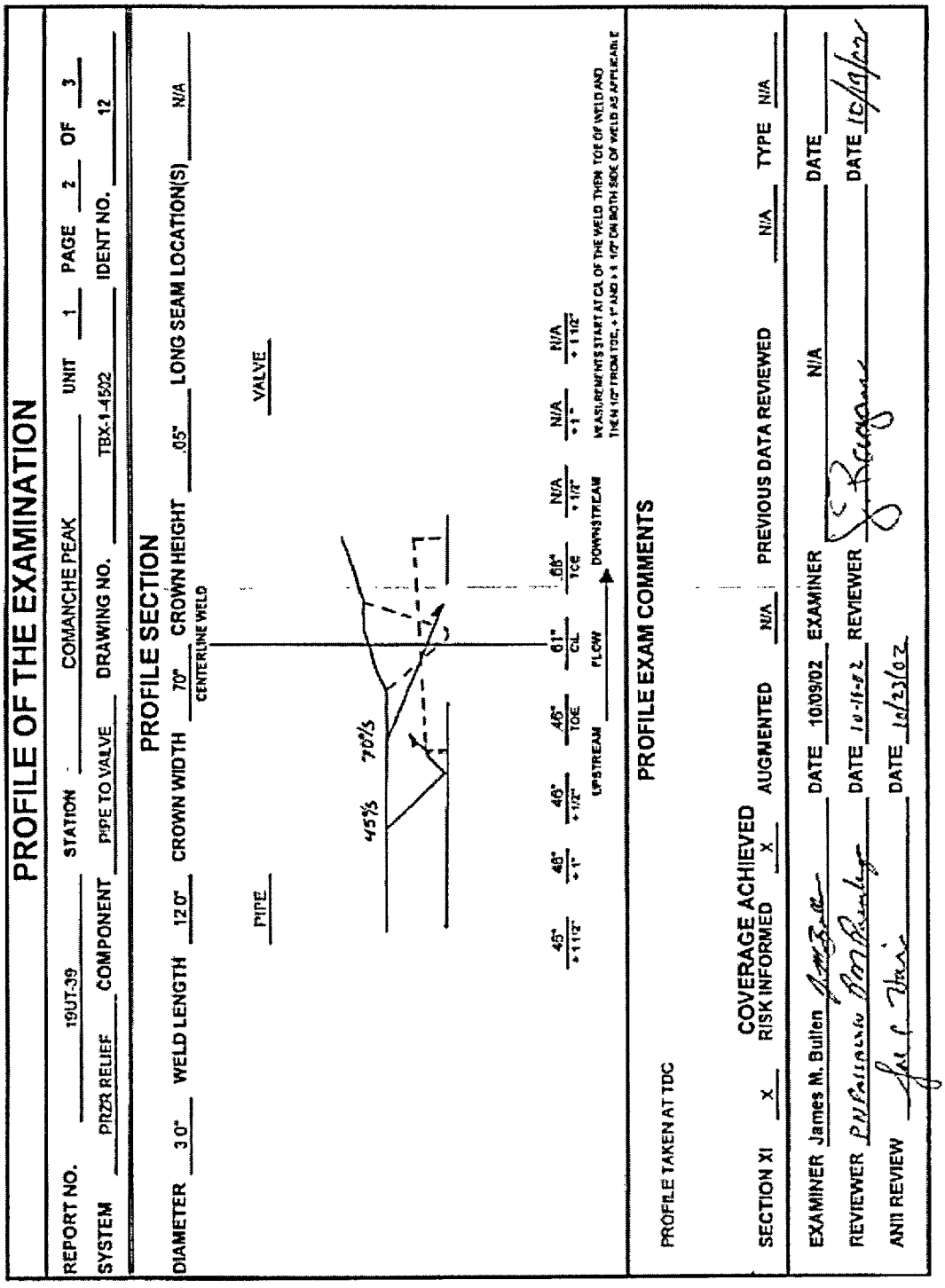


PROFILE OF THE EXAMINATION

REPORT NO. 19UT-39 STATION COMANCHE PEAK UNIT 1 PAGE 2 OF 3
SYSTEM PRZR RELIEF COMPONENT PIPE TO VALVE DRAWING NO. TBX-1-4502 IDENT NO. 12

PROFILE SECTION

DIAMETER 30" WELD LENGTH 12.0" CROWN WIDTH 70° CROWN HEIGHT .05" LONG SEAM LOCATION(S) N/A

PIPE
VALVE
CENTERLINE WELD
45°/5 70°/5
45° +1 1/2" 45° +1" 45° +1/2" 45° TOE .61" CL .66" TOE N/A +1/2" N/A +1" N/A +1 1/2"
UPSTREAM FLOW DOWNSTREAM
MEASUREMENTS START AT CL OF THE WELD THEN TOE OF WELD AND THEN 1/2" FROM TOE, +1" AND +1 1/2" ON BOTH SIDE OF WELD AS APPLICABLE

PROFILE EXAM COMMENTS

PROFILE TAKEN AT TDC

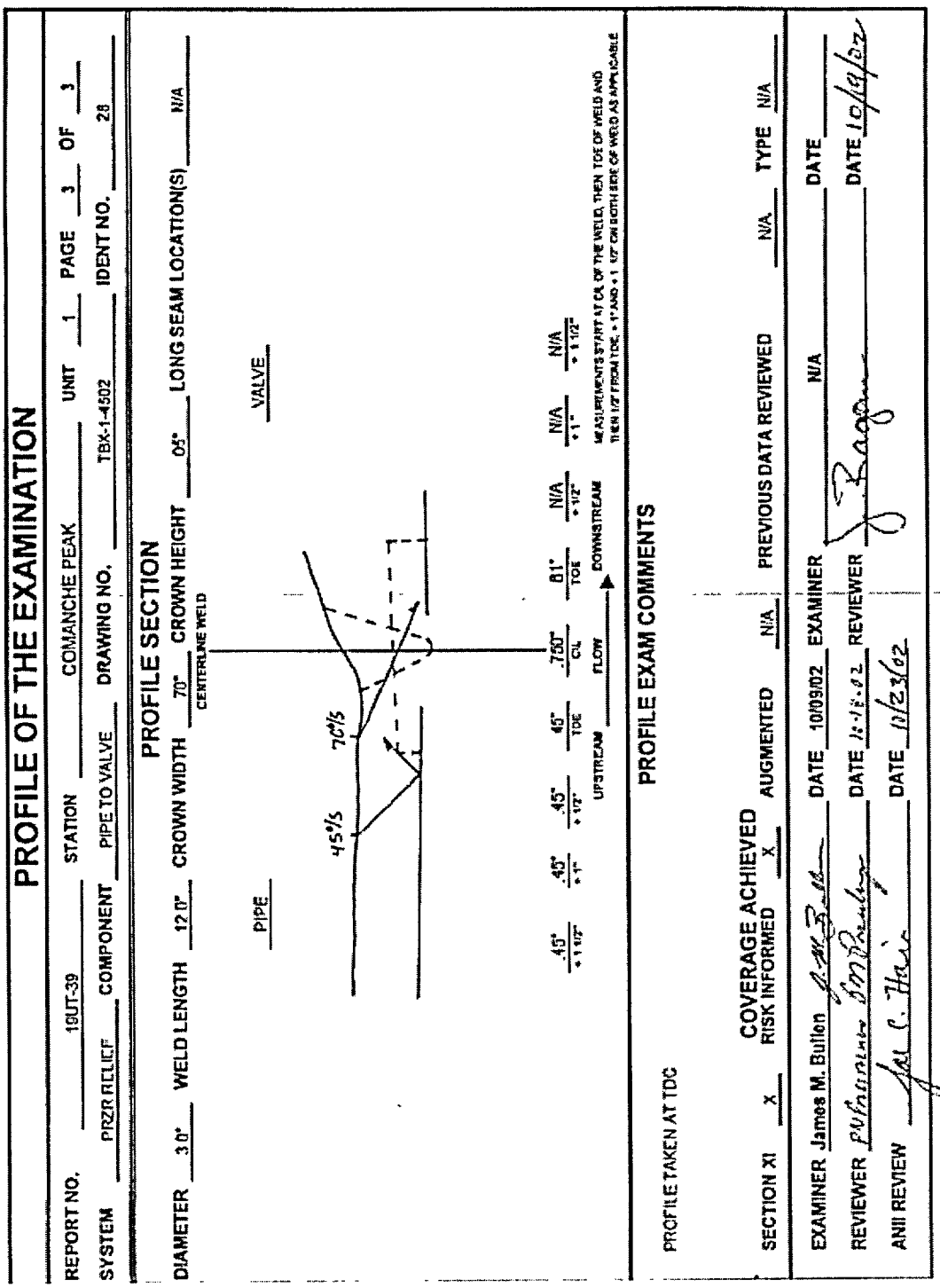
COVERAGE ACHIEVED

SECTION XI X RISK INFORMED X AUGMENTED N/A PREVIOUS DATA REVIEWED N/A TYPE N/A

EXAMINER James M. Bullen DATE 10/09/02 EXAMINER N/A DATE
REVIEWER [signature] DATE 10-10-02 REVIEWER [signature] DATE 10/9/02
ANII REVIEW [signature] DATE 10/23/02

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY-



PROFILE OF THE EXAMINATION

REPORT NO. 19UT-39 STATION COMANCHE PEAK UNIT 1 PAGE 3 OF 3

SYSTEM PRZR RELIEF COMPONENT PIPE TO VALVE DRAWING NO. TBX-1-4502 IDENT NO. 28

PROFILE SECTION

DIAMETER 3.0" WELD LENGTH 12.0" CROWN WIDTH 70° CROWN HEIGHT 05° LONG SEAM LOCATION(S) N/A

PIPE
VALVE
CENTERLINE WELD
45°/5
70°/5
.45° +1 1/2"
.45° +1"
.45° +1/2"
45° TOE
.750" CL
81° TOE
N/A +1/2"
N/A +1"
N/A +1 1/2"
UPSTREAM
FLOW
DOWNSTREAM
MEASUREMENTS START AT CL OF THE WELD, THEN TOE OF WELD AND THEN 1/2" FROM TOE, +1" AND +1 1/2" ON BOTH SIDE OF WELD AS APPLICABLE

PROFILE EXAM COMMENTS

PROFILE TAKEN AT TDC

COVERAGE ACHIEVED

SECTION XI X RISK INFORMED X AUGMENTED N/A PREVIOUS DATA REVIEWED N/A TYPE N/A

EXAMINER James M. Bullen DATE 10/09/02 EXAMINER N/A DATE

REVIEWER [illegible] DATE 10-10-02 REVIEWER DATE 10/14/02

ANII REVIEW [illegible] DATE 10/23/02

TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
FIRST TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. B-2

PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii)
-INSERVICE INSPECTION IMPRACTICALITY-