



**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(a)(g)(4)(iv)

**CPSES-2003001361**  
Log # TXX-03112

July 1, 2003

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

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)**  
**DOCKET NO. 50-446**  
**RELIEF REQUEST A-9 TO THE UNIT 2 INSERVICE INSPECTION**  
**(ISI) FROM 1986 EDITION OF ASME CODE, SECTION XI, NO**  
**ADDENDA (FIRST INTERVAL END DATE: AUGUST 2004)**

**REFERENCE: TXU Energy Letter logged TXX-03048 dated March 6, 2003 from**  
**C. Lance Terry to the NRC**

Based on discussion with your staff, TXU Generation Company LP (hereafter TXU Energy) is revising its relief request submitted via the above referenced letter. Reference to Code Case N-307-3 was removed because it was incorporated into the 2000 Addenda of ASME Section XI 1998 Edition.

Pursuant to 10 CFR 50.55a(a)(g)(4)(iv), TXU Energy hereby requests NRC approval of the enclosed relief request (A-9) for second ten-year inservice inspection interval for Unit 2. Relief is requested from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, 1986 Edition with no Addenda, Table IWB-2500-1, Category B-G-1.

TXU Energy requests approval of this relief request by August 31, 2003. The approval date was selected to allow for NRC review and approval prior to the fall refueling outage.

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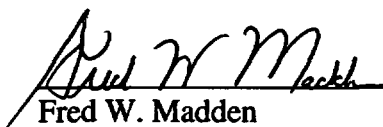
This communication contains no new licensing basis commitments regarding CPSES.  
If you have any questions regarding this request, please contact Jack C. Hicks at  
(254) 897-6725 or Obaid Bhatti at (254) 897-5839.

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

OAB/jch  
Attachment

c - T. P. Gwynn, Region IV  
W. D. Johnson, Region IV  
D. H. Jaffe, NRR  
Resident Inspectors, CPSES  
Terry Parks, Chief Inspector, TDLR  
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-9**

**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 and Studs. The subject items are depicted as TBX-1-1400-37 through 54 in the Comanche Peak Steam Electric Station Unit 2 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 requires that the examinations include both a surface *and* [emphasis added] volumetric method when the studs are removed.
- 2) Exam Figure IWB-2500-12 for Item No. B6.30 requires that the examination volume be defined as the full volume of the load-bearing portion of the studs.
- 3) Table IWB-2500-1 for Item No. B6.10 requires a surface examination for closure head nuts.

**IV. Proposed Subsequent Code Edition and Addenda and Code Case:**

TXU Energy requests to use 1998 Edition, 1999 Addenda and 2000 Addenda of the ASME Section XI Table IWB-2500-1 for category B-G-1, Items B6.10, B6.20, B6.30, B6.30, B6.40, and B6.50, for the reactor vessel head pressure retaining bolting and all associated requirements, if any as allowed by 10 CFR 50.55a(g)(4)(iv).

**TXU GENERATION COMPANY LP  
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2  
SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST NO. A-9**

**PROPOSED USE OF SUBSEQUENT ASME CODE EDITION AND ADDENDA  
PURSUANT TO 10 CFR 50.55a(g)(4)(iv)  
(Continued)**

**V. Basis of Using Subsequent Code Editions and Addenda and Code Case:**

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. 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.

**VI. Duration of Proposed Alternative:**

TXU Energy requests approval of this relief request by August 31, 2003. The approval date was selected to allow for NRC review and approval prior to the fall refueling outage.

**VII. Similar Precedents:**

1. Letter from NRC to Vogtle Electric Generating Plant dated February 20, 2002  
(TAC No. MB3242 and MB3243)
2. Letter from NRC to Edwin I. Hatch Plant dated July 2, 2002  
(TAC No. MB3060 and MB3061)