



**TXU Energy**  
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**C. Lance Terry**  
Senior Vice President &  
Principal Nuclear Officer

Ref: EA-02-261  
10CFR73.21

CPSES-200301247  
Log # TXX-03107

July 7, 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  
UPDATE OF SCHEDULE PROGRESS FOR NRC ORDER FOR  
COMPENSATORY MEASURES RELATED TO ACCESS  
AUTHORIZATION - EA-02-261 (ATTACHMENT 2)**

- 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
  2. Letter from C. Lance Terry, SVP&PNO, TXU Generating Company LP (TXU Energy) to Samuel J. Collins, NRR, 20 Day Answer to NRC Order EA-2-261 and Completion Schedule

**Gentlemen:**

Via reference 2, TXU Generating Company LP (TXU Energy) responded to the Order (EA-02-261) identifying a completion schedule for all items identified in Attachment 2 of the Order. This transmittal letter identifies the current progress and status of the items (via a schedule for achieving compliance with each requirement) described in Attachment 2 of the Order.

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

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

IE53

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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 July 7, 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. Update and Schedule for Compliance with the Attachment 2 of the Order**
- c - T.P. Gwynn, 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.

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

<b>CM</b>	<b>Title</b>	<b>Required Compliance</b>	<b>Status or Planned Implementation</b>
<b>C</b>	<b>Access Authorization Program Measures</b>		
C.1.8	Enhance Behavioral Observation	January 7, 2004	January 7, 2004
C.1.9	Access Audit Program	July 7, 2003	Complete
C.1.10	Management of Personnel Information	July 7, 2003	Complete