TXU

TXU Electric
P. O. Box 1002
Glen Rose, TX 76043-1002
Tel: 254 897 5202
Fax: 254 897 6652
jkelley2@txu.com

James J. Kelley
Vice President

(Via Facsimile and Certified Mail)

December 11, 2003 TXX - 03207

Executive Director
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Attention: Michael Sunderlin
Wastewater Permitting Section (MC-148)

Comanche Peak Steam Electric Station
TPDES Permit No. 01854
Response to Draft Permit

Dear Mr. Sunderlin:

TXU Generation Company LP has received and reviewed the above referenced draft TPDES Permit issued November 20, 2003 (and revised by e-mail on November 25, 2003). The Company offers the following comments as its formal response:

A. *Public Notice:* The Company requests that the location of the facility referenced in the second paragraph be changed to the following street address: 6322 North FM 56, Glen Rose, Somervell County, TX, 76043.

B. *Cover Page:* The Company requests that the location of the facility be changed to the street address referenced in Item A.

C. *Outfall 001:* The term "discharge canal" in Item 3.should be replaced with "discharge structure" to better reflect the conditions at the facility. There is no discharge canal.

D. *Outfall 004:*

1. To maintain consistency with the TXU Generation's other permits, the Company requests that the language concerning oil & grease and pH in footnote (*3) be moved to Other Requirements.

2. The Company requests that the oil & grease language be changed to allow compositing of separate discharge points into one single flow weighted sample. An alternate sampling procedure has been approved by the Agency and incorporated into the Company's other permits. See Permit No. 1249, Other Requirements, Provision 11 for an example. A footnote reference to "Other Requirements" will be necessary.

3. The Company desires to retain the original language from the current permit so that pH values may be determined from a composite sample or mathematically combined into a single flow-weighted value.

   The authority to composite samples for pH analysis was first granted to this facility by the U. S. Environmental Protection Agency with the May 1, 1989 reissuance of NPDES Permit No. TX0065854; similar authority had been granted at an even earlier date (April

C001

2, 1979) by the Texas Water Commission (TWC). This practice measures the overall impact on the receiving water environment and should be acceptable because the individual environmental impact of the separate discharges is so negligible. The Company believes that this information justifies continuation of this practice. The Company questions the environmental benefit versus economic cost of the proposed requirement and is ready to discuss this issue further with the Commission, if necessary.

E. *Outfall 005:* The Company believes that footnote (*1) associated with temperature for this outfall is irrelevant and should be deleted. This outfall is only required to measure temperature once per day when discharging; therefore, the concept of a flow-weighted average temperature does not apply.

F. *Other Requirements, Provision 11:* In the paragraph following the liner descriptions, there is a typographical error. It should read, "...and at **least** a week prior to its use."

G. *Chronic Biomonitoring Requirements, Item 1.e.:* There is a typographical error in the last sentence. It should read, "...frequency reduction ceases five years from the **issuance** date of this permit,...."

H. *Fact Sheet, Page 7*: The last two sentences of the third paragraph describe the R.O. system wastestream. This wastestream has been rerouted for processing through the facility's Low Volume Waste Basins A, B or C and no longer goes to the concrete equalization basin and a limestone neutralization basin. Therefore, the last two sentences in the paragraph should be deleted. The preceding description of the R.O. system as part of the low volume Waste Management System (WMS) is correct.

The Company expresses its gratitude for the time and effort involved in the development of this permit. If you have any questions, please contact Scott Wilde at (214)812-5221.

Sincerely,

James J. Kelley, Jr.

by: Gerald R. Johnson
Generation Environmental Manager

SKW

bcc: Randy Morrison
Bruce Turner
Gail Jespersen
Mr. M. C. Thadani
U. S. Nuclear Reactor Regulation
Office of Nuclear Reactor Regulation
One White Flint North
11555 Rockville Pike
MS 7 D 1
Rockville, MD 20852
U. S. Nuclear Regulatiry Commission
Attn: Document Control Desk
Washington, DC 20555
Tim O'Shea
David Rutledge
File: Tim O'Shea

CORRESPONDENCE SIGN-OFF SHEET

Document Number: TXX 03204		File Number:
Issued Date: December 10, 2003	CPSES	Unit Affected: (1, 2, Generic)
Title/Subject: TPDES Permit No. 01854 Response to Draft Permit		
Commitment(s) Identified: No: Yes: (if yes, list and attach)		
Attachments: Commitments: Attachment: Enclosure: Distribution Sheet: Special Instructions:		
Hand carry to next person for signature		Return to originator by: / /

FUNCTION	INITIALS	SIGNATURE*	COMMENTS	CORRECTIONS
SW/EHS Originator	SKW			
Cognizant Manager	~~BM~~ MWS	MW	None	
	BGT 12/10/03		See Attached	
Vice-President(s)	JJK			
Legal Review				
Proof Reader				
RA/EHS Mgr. (Last)	GRJ		12/11/03	

Signature indicates approval of the correspondence content, commitment status (if identified) and attachments (if identified)

Associated Incoming Correspondence Information			Outgoing (this document) Correspondence Document Information			
Incoming Document No.	ACL No.	*New ACL No.*	*Electronic Submittal*	*Follow-up Submittal*	*Licensing Fee Required*	*Notary Required*
			Yes No	Yes No	Yes No	Yes No

Other References:

Comments:

Upon Issuance of attached correspondence, modify tracking database as required and initial this form: