



TXU

TXU Energy
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Mike Blevins
Senior Vice President & Principal Nuclear Officer

Ref: EA-02-261
10CFR73.21

CPSES-200400007
Log # TXX-04005

January 7, 2004

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

U.S. Nuclear Regulatory Commission
ATTN: Mr. Glenn M. Tracy, Director
Division of Nuclear Security
Nuclear Security and Incident Response
Room T-4D8, Mail Stop T-4D7
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
FULL COMPLIANCE WITH NRC ORDER FOR COMPENSATORY
MEASURES RELATED TO ACCESS AUTHORIZATION ORDER
EA-02-261

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

Gentlemen:

Via reference 1, the U.S. Nuclear Regulatory Commission (NRC or Commission) issued an Order to TXU Generating Company LP (TXU Energy) that modifies the current operating licenses for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The Order was immediately effective and requires compliance with specific compensatory measures associated with access authorization as stated in an attachment to 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

IES3

TXX-04005

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TXU Energy, at CPSES, is in full compliance with the requirements associated with the Order. This letter satisfies section C.2 of the Order. Attachment 1 to this letter identifies the compliance dates associated with those requirements for CPSES.

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 January 7, 2004.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner



Mike Blevins
Senior Vice President and Principal Nuclear Officer

NSH/nh

Attachments:

TXU Energy, CPSES, Answer to the Order

c - B. S. Mallett, Region IV
W. D. Johnson, Region IV
M. C. Thadani, NRR
Resident Inspectors, CPSES

TXU Energy Answers to the 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:
 - a) compensatory measure B.1.1 which shall be implemented no later than April 7, 2003 and,
 - b) 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 B.1 of this Order to identify the condition as a requirement with which it cannot comply, with attendant justifications as required in Condition B.1.
- 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 [of the Order].

TXU Energy Answers to the Order

The TXU Energy answers below apply to all Compensatory Measures (CMs) identified in the Order. TXU Energy is in full compliance with all requirements of Attachment 2 of the Order EA-02-261 as identified below:

CM	Title	Required Compliance Date	CPSES Compliance Date
B	Unescorted Access Authorization Measures		
B.1.1	Alternative Method For Access	April 7, 2003	April 7, 2003
B.1.2	Access Categories	July 7, 2003	July 7, 2003
B.1.3	Verify True Identity	July 7, 2003	July 7, 2003
B.1.4	Initial Unescorted Access	July 7, 2003	July 7, 2003
B.1.5	Updated Unescorted Access	July 7, 2003	July 7, 2003
B.1.6	Psychological Evaluation	July 7, 2003	July 7, 2003
B.1.7	Reinstated Access	July 7, 2003	July 7, 2003
C.1.1	Implement Common Vehicle (PADS)	July 7, 2003	July 7, 2003
C	Access Authorization Program Measures		
C.1.2	Access Denial Data Entry	July 7, 2003	July 7, 2003
C.1.3	Personnel Follow-up at Other Plants	July 7, 2003	July 7, 2003
C.1.4	10CFR26 Violation Notification	July 7, 2003	July 7, 2003
C.1.5	Denied Access Actions	July 7, 2003	July 7, 2003
C.1.6	Conduct Re-investigations	January 7, 2004	January 7, 2004
C.1.7	Screening of BI Screeners	July 7, 2003	July 7, 2003
C.1.8	Enhance Behavioral Observation	January 7, 2004	January 7, 2004
C.1.9	Access Audit Program	July 7, 2003	July 7, 2003
C.1.10	Management of Personnel Information	July 7, 2003	July 7, 2003