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Ref: Technical Specification 5.6.10

CPSES-0401217
Log # TXX-04085

April 27, 2004

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
UNIT 1, DOCKET NO. 50-445
TECHNICAL SPECIFICATION REPORTS FOR STEAM
GENERATORS MEETING C-3 CATEGORY AND 15-DAY TUBE
PLUGGING AND REPAIR

Gentlemen:

As Attachment 1 to this letter, TXU Generation Company LP (TXU Energy) hereby submits a report pursuant to CPSES Technical Specification 5.6.10.c for Steam Generators (SGs) meeting C-3 conditions during the current refueling outage.

Attachment 2 of this letter submits the 15-day report of tubes plugged, repaired, or designated as an F* tube pursuant to CPSES Technical Specification 5.6.10.a.

Should you require any other additional information please contact Mr. Bob Kidwell at (254) 897-5310.

This communication contains no new licensing basis commitments regarding CPSES Unit 1.

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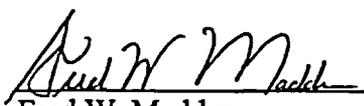
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Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Regulatory Affairs Manager

RJK/rjk

Attachment 1 - Report of Steam Generators in Category C3 condition.
Attachment 2 - Report of Steam Generator Tubes Plugged or Repaired

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

**TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1
REPORT OF STEAM GENERATORS IN C-3 CATEGORY**

The following information meets the information reporting requirements of CPSES Technical Specification 5.6.10.c., which states:

“Results of steam generator tube inspections which fall into Category C-3 shall be reported to the Commission in a report within 30 days and prior to resumption of plant operation. This report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.”

Comanche Peak Steam Electric Station (CPSES) Unit 1 was taken off line on March 27, 2004 for the tenth refueling outage (1RF10). As part of the scheduled surveillance requirements of CPSES Technical Specification (TS) 5.5.9, analysis of eddy current plus point testing data on the Steam Generators (SGs) indicated that greater than 1 percent of the total tubes inspected in each of the four SGs were defective. On April 5, 2004, the first of the four SGs fell into Category C-3.

The extent of the tube degradation found during 1RF10 was not unexpected. Past inspection results and tube degradation prediction models indicated that the degradation of the tubing in the Unit 1 SGs would accelerate as the plant ages. This has generally been true of other plants with original Westinghouse SGs fabricated with Alloy 600 tubing.

The majority of the tube defects are attributed to circumferential outside diameter stress corrosion cracking (ODSCC) at the hot leg top of tubesheet (TTS) transition. All defective tubes did meet the criteria of NUREG 1022, Revision 2, for structural integrity.

To prevent further degradation of the tubes displaying these defects, TXU Energy has plugged or sleeved all defective tubes identified during the current refueling outage. In addition, TXU Energy will continue to follow the requirements of NEI 97-06 and the referenced EPRI guidelines for future cycles of operation. These guidelines include maintaining primary and secondary water chemistry below recommended levels, primary to secondary leakage monitoring, inspection scope and frequency, pressure testing degraded tubes, and performing integrity assessments to ensure tube structural and leakage integrity. The Condition Monitoring and Preliminary Operational Assessment, performed in accordance with the EPRI Integrity Assessment Guidelines during 1RF10, addresses the as-found condition of the steam generator tubing and justifies operation for the next operating cycle. The assessment is based on degradation identified and conservative analysis to assure tube structural and leakage integrity for the entire cycle length.

**TXU GENERATION COMPANY LP
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1**

REPORT OF STEAM GENERATOR TUBES PLUGGED OR REPAIRED

The following information meets the information reporting requirements of CPSES Technical Specification 5.6.10.a., which states:

“Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged, repaired or designated as an F* tube in each steam generator shall be reported to the Commission;”

Total tubes plugged, repaired by sleeving, or designated as an F* tube during refueling outage 1RF10 (includes some previously plugged tubes that were recovered by sleeving):

CPSES UNIT 1 STEAM GENERATOR 1

- 14 tubes were plugged in this steam generator
- 78 tubes were sleeved in this steam generator
- 2 tubes were designated as an F* (as defined in CPSES TS) tube.

CPSES UNIT 1 STEAM GENERATOR 2

- 33 tubes were plugged in this steam generator
- 180 tubes were sleeved in this steam generator
- 1 tube was designated as an F* (as defined in CPSES TS) tube.

CPSES UNIT 1 STEAM GENERATOR 3

- 47 tubes were plugged in the steam generator
- 145 tubes were sleeved in this steam generator
- 1 tube was designated as an F* (as defined in CPSES TS) tube.

CPSES UNIT 1 STEAM GENERATOR 4

- 43 tubes were plugged in this steam generator
- 144 tubes were sleeved in this steam generator
- 2 tubes were designated as an F* (as defined in CPSES TS) tube.