



TXU Power  
Comanche Peak Steam  
Electric Station  
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Mike Blevins  
Senior Vice President  
& Principal Nuclear Officer

4/19/04  
69 FR 20953  
(4)

RECEIVED  
2004 JUN 18 AM 11:27  
Rules and Directives  
Branch  
USNRC

CPSES-200401514  
TXX-04098

June 14, 2004

Chief, Rules and Directives  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
Solicitation of Public Comments on the Report on the Independent  
Verification of the Mitigating Systems Performance Index (MSPI)  
Results for the Pilot Plants

REF: 1. Federal Register Notice, 69 FR 20953, dated April 19, 2004.  
2. Letter, Nuclear Energy Institute (NEI) to NRC same subject, dated  
June 11, 2004.

Gentlemen:

TXU Generation Company LP (TXU Power) is endorsing the comments on Federal Register Notice, 69 FR 20953, dated April 19, 2004, prepared by the Nuclear Energy Institute (NEI). We believe that the NRC report provides an accurate formulation of the analyses, decisions and consensus developed over the past several years and should be used in revising the proposed MSPI guidance with consideration of the NEI comments. With the changes proposed in the report's recommendations, we believe that the MSPI will provide a more appropriate indication of performance that is superior to the current Safety System Unavailability (SSU) indicator.

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

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

FRIDS = ADM-03  
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Template = ADM-013

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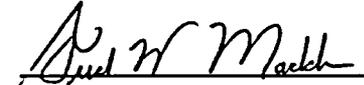
TXU Power appreciates the opportunity to comment on this document. If there are any questions regarding these comments, please contact Douglas W. Snow at 254-897-8448 or dsnow2@txu.com

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,  
Its General Partner

Mike Blevins

By:   
Fred W. Madden  
Regulatory Affairs Manager

TAH/dws

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