



TXU Power  
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Ref: NRC RAI  
TAC: MC2906 / MC2907

CPSES-20041773  
Log # TXX-04135

July 22, 2004

Ms. Margaret H. Chernoff, Project Manager  
Security Plan Review Team  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
Room 8 G15, Mail Stop 8 G9A  
11555 Rockville Pike  
Rockville, Maryland 20852

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO USNRC REQUEST FOR ADDITIONAL  
INFORMATION – CPSES SECURITY PLAN

REFERENCES: (1) USNRC Request for Additional Information (RAI),  
Receipt Dated June 21, 2004; Security Plan Section 10 - 19  
  
(2) USNRC Request for Additional Information (RAI),  
Receipt Dated June 28, 2004; Security Plan Sections 1 – 9  
  
(3) Letter from Mike Blevins to USNRC, Logged TXX-04123,  
Dated July 8, 2004  
  
(4) Letter from Mike Blevins to USNRC, Logged TXX-04119,  
Dated July, 15, 2004  
  
(5) USNRC Request for Additional Information (RAI),  
Receipt Dated July 12, 2004, Security Plan Sections 4.0, 3.1,  
Critical Task Matrix – Table 1

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Ms. Chernoff:

Via reference 5, the Nuclear Regulatory Commission (NRC) requested additional information for certain sections in the CPSES Security Plan. By this transmittal, TXU Generation Company LP (TXU Power) acknowledges the RAI letter and provides the following responses. TXU Power's response to the RAI is found in the attachment to this transmittal. This transmittal does not contain Safeguards Information (SI).

Should you have any questions or require additional information, please contact Mr. Don Alps, Security Manager at 254-897-5432. This communication contains no new or revised commitments.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,  
Its General Partner



Mike Blevins

NSH

Attachment

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

Attachment to TXX-04135

Request for Additional Information Dated July 12, 2004  
to the Comanche Peak Security Plan (CSP)

Question 1 – Table 1 Critical Task Matrix  
Response to Parts A and B

The Critical Task Matrix, CPSES Security Plan, Appendix B, Table 1, lists the positions of ASO, SO, CSO and SSS. The position acronyms are defined in Comanche Peak Security Plan (CSP), Appendix B, and in Section 3.1 (Associate Security Officer (ASO), Security Officer (SO), CAS/SAS Operator (CSO), and the Security Shift Supervisor (SSS)) and are consistent with CSP, Section 4.

Within the CPSES Security Organization, these four positions cover all contract security personnel; from Security Chief to the new hire. For example, the ASO is the equivalent of a watchperson as defined in the Security Plan template, and is used primarily for new hire staff until all Security Officer training is complete. Therefore, the physical fitness (item 22) and shotgun proficiency (item 26) elements are not required.

The SO is equivalent to the armed security officer as defined in the Security Plan template. The CSO is the CAS/SAS Operator. These individuals staff the alarm stations. Typically, CSOs at CPSES are also qualified SOs, however, the position table in the CSP was arranged to allow individuals to be employed as a CSO only.

The SSS is the Security Shift Supervisor and is responsible for daily shift operations. An Assistant SSS on each shift can stand in for the SSS or may be assigned as the response force team lead. Other security personnel, such as the Security Chief, Training supervisor, Instructors, and test group individuals, meet the qualifications commensurate with their ancillary duties. For example, the Security Chief can step in as a SSS or a test group individual can be an SO if needed to meet short term staffing needs.

No change to the CSP is indicated in order to address Question 1, Parts A and B.

Attachment 1  
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Question 2 – Section 4.0 Team Training  
Response to 2a

Section 4.0 of the CPS states that tactical drills and force-on-force drills are conducted to demonstrate security system effectiveness. These are frequent, limited scale training and practice activities intended to prepare the facility security response team. The next sentence of this paragraph clearly states the “force-on-force exercises” are conducted annually. This is consistent with the regulations and NRC requirements.

No change to the CSP is indicated in order to address Question 2a

Response 2b

TXU Power agrees with the intent of the statement within the RAI. However, since this requires a word change to the template, TXU Power considers this RAI a generic change to the NRC endorsed template. We are forwarding the question to the industry Security FAQ Panel for consideration. We will make the appropriate changes to our physical security plan once a final determination is rendered.

Question 3 – Section 3.1 Critical Task Matrix

Refer to the Question 1 response. No change to the CSP is indicated in order to address this question.

Question 4 – Table 1 Critical Task Matrix

Refer to the Question 1 response. No change to the CSP is indicated in order to address this question.