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Ref: 10 CFR 50.55a(g)

CPSES-200401770
Log # TXX-04133

August 2, 2004

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-446
TRANSMITTAL OF UNIT 2 INSERVICE INSPECTION PROGRAM
PLAN, REVISION 0 (UNIT 2: ASME CODE SECTION XI
1998 EDITION, 1999 AND 2000 ADDENDA, INTERVAL START
DATE - AUGUST 3, 2004, SECOND INTERVAL)

Gentlemen:

Revision 0 to the Unit 2 Inservice Inspection (ISI) Program Plan is enclosed for your review. As indicated in TXU Power Letter dated April 11, 2003, logged TXX-03076, TXU Power opted to incorporate the ASME Section XI Edition and Addenda, as referenced in Federal Register, dated September 26, 2002 (Volume 67, Number 187)(Final Rule). A comprehensive review of the Code Edition change was completed and is documented in Engineering Report ER-ME-002. This Engineering Report depicts ASME Section XI changes from the 1986 Edition of the Code up to 2000 Addenda. This report is available at CPSES for your review.

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The enclosed Revision 0, Second Interval to the Unit 2 Inservice Inspection (ISI) Program Plan replaces the Plan Revision 3, First Interval in its entirety. This transmittal does not contain a request for relief from ASME Code requirements; however, in accordance with NRC Staff's request a separate letter for relief requests will document such requests, if warranted. The attached ISI Program Plan Revision includes items such as rescheduled exams and updated drawings. The relief requests included in Appendix A are included in the ISI Program Plan for information only.

The major impacts associated with the Code year changes for ISI are summarized below:

- The 1998 Edition of Section XI of the ASME BPV Code revised the requirements in Tables IWB-2412-1, IWC-2412-1, and IWD-2412-1 to increase the maximum examinations that can be credited during the first inspection from 34 to 50 percent. This increase improves the efficiency of the ISI inspections and tests conducted during the first inspection period.**
- The 1998 Edition of Section XI of the ASME BPV Code deleted the requirement in IWE-2200(g) to perform a visual examination of paint and coatings reapplied to containment surfaces. The visual examination of paint and coatings reapplied to containment surfaces is now performed via other programs and by personnel who are no longer required to be qualified in accordance with Section XI requirements.**
- The requirement in IWE-2420(c) of Section XI to reexamine areas containing flaws, areas of degradation, or repairs during three consecutive inspection periods was deleted in the 1998 Edition. The 1998 Edition states that when reexaminations reveal that the flaws or areas of degradation are essentially unchanged for the next inspection period, these areas no longer require reexamination. The revision to IWE-2420(c) will reduce the number of reexaminations that are conducted each inspection period.**
- The provisions of Table IWE-2500-1, Examination Category E-A, Items E1.10 and E1.11, were revised in the 1998 Edition of Section XI to no longer require a torque test of each containment bolted connection.**
- The 1998 Edition of Section XI of the ASME BPV Code eliminated the requirement to visually examine containment seals and gaskets that was previously in Table IWE-2500-1, Category E-D, Items E5.10 and E5.20.**
- The Final Rule revised the existing § 50.55a(b)(2)(xiv) to allow licenses to use the annual practice described in VII-4240 of Supplement VII of Section XI, 1999 Addenda, and 2000 Addenda.**

- **The 1995 Addenda of Section XI revised IWA-5213(a) to eliminate the provisions requiring system pressure and temperature conditions to be maintained for four hours on insulated systems or components, or 10 minutes on non-insulated systems or components, prior to conducting system leakage tests. Section 50.55a(b) (2) (xx) in this Final Rule requires a 10-minute holding time after attaining test pressure for Class 2 and Class 3 components that do not normally operate during operation, but does not require any hold time for the remaining Class 2 and Class 3 components provided that the system has been in operation for at least four hours for insulated components or 10 minutes for non-insulated components.**
- **The 1999 Addenda to Section XI decreased the rate of search unit movement from six to three inches/second when conducting ultrasonic (UT) examinations of piping systems in accordance with Mandatory Appendix III-2420.**
- **Section 50.55a(b)(2)(xxi)(B) in the Final Rule requires licensees to use the requirements of Table IWB-2500-1, Examination Category B-G-2, Item B7.80 of the 1995 Edition in lieu of the 1997 Addenda, the 1998 Edition, the 1999 Addenda, and the 2000 Addenda. The 1995 Addenda incorporated the provisions of Code Case N-547, "Alternative Examination Requirements for Pressure Retaining Bolting of Control Rod Drive Housings." Code Case N-547 deletes the examination of control rod drive (CRD) bolting whenever the CRD housing is disassembled.**
- **Section 50.55a(b)(3)(VI) in the Final Rule permits an exercise interval of two years for manual valves within the scope of the ASME OM Code. The 1998 Edition of the ASME OM Code specified an exercise interval of three months for manual valves within the scope of the Code.**
- **Paragraph IWA-5110(c) was revised in the 1997 Addenda to Section XI to allow piping that penetrates containment to be exempted from periodic system pressure testing when the piping and containment isolation valves only perform a containment integrity function, and are connected to piping that is not in the scope of Section XI (the piping is not in a system required to mitigate accidents, shut down the plant, or maintain a shutdown condition).**
- **Paragraph IWA-2316 was revised in the 1998 Edition of Section XI to eliminate the requirement that VT-2 examination personnel must receive annual training. The revised VT-2 qualification requirements state that VT-2 personnel must have 40 hours of plant walkdown experience, and four hours of training in Section XI requirements and plant-specific procedures for VT-2 visual examination, and must pass a yearly vision test.**

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This communication contains no new licensing basis commitments regarding CPSES Unit 2.

If you have any questions or need additional information regarding this matter, please feel free to contact Jack Hicks at (254) 897-6725.

Sincerely,

TXU Generation Company LP

**By: TXU Generation Management Company LLC,
Its General Partner**

Mike Blevins

By: 
Fred W. Madden
Regulatory Affairs Director

JCH

Enclosure

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