October 27, 2004

LICENSEE: TXU Generation Company, LP

FACILITY: Comanche Peak Steam Electric Station, Unit 1

SUBJECT: SUMMARY OF OCTOBER 19, 2004, MEETING WITH TXU GENERATION COMPANY, LP, TO DISCUSS ITS PLANS FOR REPLACEMENT OF STEAM GENERATORS AT THE COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNIT 1 (TAC NO. MC4237)

On October 19, 2004, the U. S. Nuclear Regulatory Commission (NRC) staff met with the representative of TXU Generation Company, LP (TXU, the licensee), to hear TXU's briefing on its plans for replacement of the current Westinghouse D-4 steam generators (SGs) with integral preheaters. A list of meeting attendees is provided as Enclosure 1.

The TXU staff outlined its plans to replace the current Westinghouse D-4 SGs with proposed Delta 76 SGs incorporating a feed ring design. The proposed replacement SGs (RSGs) are similar to the Delta 75 SGs that were installed at the Shearon Harris and V.C. Summer plants. The proposed RSGs each incorporate Alloy 690 U-tubes and will be fabricated by Equipos Nucleares, S.A. of Spain.

Specifically, TXU discussed the design features, compared the design features with the current Westinghouse D-4 SGs, outlined the changes to operating strategies for RSGs, and discussed the Updated Final Safety Analysis Chapter 15 changes in analytical methods regarding postulated accidents. The licensee's viewgraphs are included as Enclosure 2 and are placed in the Agencywide Documents Access and Management System (ADAMS) (ML042990515) (Note: Public access to ADAMS has been temporarily suspended so that security reviews of publicly available documents may be performed and potentially sensitive information removed. Please check the NRC Web site for updates on the resumption of ADAMS access.)

The TXU staff discussed its plans to submit topical reports supplements, and to request Technical Specifications (TS) amendments for the NRC staff review and approval. TXU described the following other potential licensing actions:

- A general update of radiological dose consequence methodologies to be consistent with Regulatory Guide (RG) 1.195. Results of the analyses will be evaluated by Section 50.59 of Title 10 of the *Code of Federal Regulations* evaluations.

- A general review of other methodologies employed by TXU in the RSG project.

The licensee stated that it plans to submit its topical reports by December 2004, proposed TS amendment requests by fall of 2005, and will request NRC approval of topical reports by the winter of 2006. The license amendment requests will be submitted by spring of 2006, and NRC approvals will be requested by February 2007. The RSGs installation will be completed by spring of 2007.

The NRC staff informed TXU that when following RG 1.195, to update the radiological dose assessment methodologies, the licensee should address the RG 1.196 companion guidance, or provide some other methodology. The NRC staff cautioned that it took four years to develop RG 1.195/RG 1.196 guidance for acceptable methodologies. Approval of adopting some other methodologies will be time consuming. The NRC staff also felt that the use of the guides will have impact on the acceptance criteria that might result in requirements to amend TS.

TXU also asked the NRC staff's preference to have the amendment request for updating TS 5.5.9, and adopting TSTF-449 be submitted separately or simultaneously. At the meeting, the NRC staff deferred the answer to the licensee's question, pending discussion with other NRC staff. Subsequently, following discussion with other NRC staff, it was decided that the NRC staff would prefer to receive the two submittals simultaneously.

In response to NRC staff's questions about fabrication, inspection, and quality assurance activities; TXU responded with a 42-slide presentation that addressed the NRC staff's issues.

Sincerely,

/RA/

Mohan C. Thadani, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-445

Enclosures: 1. List of Attendees
2. Viewgraphs

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LIST OF ATTENDEES

NAME	ORGANIZATION
Mohan Thadani	NRC
Whee Choe	TXU Power
James Boatwright	TXU Power
Bob Kidwell	TXU Power
Y. Gene Hsii	NRC
Ben Mays	TXU Power
Matt Yoder	NRR
Greg Makar	NRR
Mark Blumberg	NRR
Fred Madden	TXU Power

Comanche Peak Steam Electric Station

cc:

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 2159
Glen Rose, TX 76403-2159

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Mr. Fred W. Madden, Director
Regulatory Affairs
TXU Generation Company LP
P. O. Box 1002
Glen Rose, TX 76043

George L. Edgar, Esq.
Morgan Lewis
1111 Pennsylvania Avenue, NW
Washington, DC 20004

County Judge
P. O. Box 851
Glen Rose, TX 76043

Environmental and Natural
Resources Policy Director
Office of the Governor
P. O. Box 12428
Austin, TX 78711-3189

Mr. Richard A. Ratliff, Chief
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Mr. Brian Almon
Public Utility Commission
William B. Travis Building
P. O. Box 13326
1701 North Congress Avenue
Austin, TX 78701-3326

Ms. Susan M. Jablonski
Office of Permitting, Remediation
and Registration
Texas Commission on Environmental
Quality
MC-122
P. O. Box 13087
Austin, TX 78711-3087

Terry Parks, Chief Inspector
Texas Department of Licensing
and Regulation
Boiler Program
P. O. Box 12157
Austin, TX 78711

Mr. M. R. Blevins
Senior Vice President
& Chief Nuclear Officer
TXU Energy
ATTN: Regulatory Affairs
P. O. Box 1002
Glen Rose, TX 76043