



## SAFEGUARDS INFORMATION

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Ref: NRC-EA-02-026  
NRC-EA-03-086

CPSES-20051062  
Log # TXX-05101

May 31, 2005

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, Maryland 20852

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445/446  
RESPONSE TO NRC GUIDANCE REGARDING MITIGATION  
STRATEGIES

REFERENCE: NRC Staff Guidance for Use in Achieving Satisfactory Compliance  
with February 25, 2002, Order Section B.5.b, "NRC B.5.b.  
Guidance," dated February 25, 2005

Mr. Dyer:

The NRC issued Orders For Interim Safeguards and Security Compensatory  
Measures ("Order EA-02-026" or "ICM Order") dated February 25, 2002, for the  
Comanche Peak Steam Electric Station (CPSES).

Order EA-02-026 imposed requirements on nuclear power plants licensed pursuant to  
the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations.  
Section III.A of the ICM Order required licensees to implement certain changes in  
physical security plans and safeguards contingency plans on an interim basis until  
final requirements were established. Among other requirements, TXU Generating  
Company LP (TXU Power) submitted its response to Section II.B.5.b. to Order EA-  
02-026 by the August 31, 2002, required date.

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Subsequently, the NRC issued Orders, dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors (“Order EA-03-086” or “DBT Order”) and other security related Orders (collectively “Orders”) for CPSES. In many ways, Order EA-03-086 complemented or superseded requirements the interim measures imposed by Order EA-02-026.

As required by Order EA-03-086, the plans for CPSES have been implemented. Subsequently, TXU Power was requested to respond to your letter dated February 25, 2005, *NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b*, (“NRC B.5.b. Guidance”) by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005. Specifically, nuclear power plant licensees were requested by Enclosure 2, *Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order* (dated February 24, 2005) (“NRC B.5.b. Guidance”), to the February 25, 2005, letter to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the licensees’ mitigating strategies that licensees deemed appropriate in accordance to Attachment B to that Enclosure.

Subsequently, the Nuclear Energy Institute (“NEI”), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use (“NEI Guidance”) to assist licensees in responding to the February 25, 2005, letter.

As requested in the February 25, 2005, letter, TXU Power has reviewed the information in Attachments A and B in accordance with the NEI Guidance and is hereby submitting, as a Safeguards Information attachment to this letter (Attachment 1), TXU Power’s evaluation of the information the NRC provided. Attachment 1 (Safeguards Information) reflects the results of a comprehensive and thorough review of the guidance and describes the considerations that TXU Power either has already or intends to implement at CPSES by August 31, 2005.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were “readily available,” and (2) if equipment is readily available, can it be effectively utilized in a licensee’s mitigating strategy. TXU Power considered “readily available” to mean that the equipment or resources was already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources

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are readily available, the second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

In accordance with these principles, mitigative strategies are being implemented to address the NRC B.5.b. Guidance. These actions are considered to be commitments for that purpose and will be managed in accordance with TXU Power commitment management system.

Attachment 2 to this letter is the schedule that TXU Power has developed regarding the implementation of commitments resulting from the evaluations documented in Attachment 1.

This communication contains new commitments as identified in Attachment 2 to this transmittal as they apply to CPSES Units 1 and 2.

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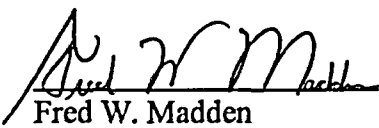
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Respectfully submitted,

TXU Generation Company LP

By: TXU Generation Management Company LLC,  
Its General Partner

Mike Blevins

By:   
Fred W. Madden  
Director, Regulatory Affairs

NSH

Attachments:

Attachment 1: Comprehensive Review Results as Applicable to CPSES of the  
Guidance and Considerations in the Reference Document

Attachment 2: Schedule for Implementation of Commitments Resulting from the  
Evaluations Documented in Attachment 1

c: B. S. Mallett, Region IV  
M. C. Thadani, NRR  
Resident Inspectors, CPSES  
J. E. Dyer, Director, Office of Nuclear Reactor Regulation

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