

**TXU Power**  
Comanche Peak Steam  
Electric Station  
P. O. Box 1002 (E01)  
Glen Rose, TX 76043  
Tel: 254 897 5209  
Fax: 254 897 6652  
mike.blevins@txu.com

**Mike Blevins**  
Senior Vice President &  
Chief Nuclear Officer

Ref: #10CFR50.54(f)

CPSES-200502600  
Log # TXX-05216

January 9, 2006

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

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
60-DAY RESPONSE TO NRC BULLETIN 2004-01,  
"INSPECTION OF ALLOY 82/182/600 MATERIALS USED  
IN THE FABRICATION OF PRESSURIZER  
PENETRATIONS AND STEAM SPACE PIPING  
CONNECTIONS AT PRESSURIZED WATER REACTORS,"  
REVISION 1 OF NRC ORDER EA-03-009, "ISSUANCE OF  
FIRST REVISED NRC ORDER (EA-03-009) ESTABLISHING  
INTERIM INSPECTION REQUIREMENTS FOR REACTOR  
PRESSURE VESSEL HEADS AT PRESSURIZED WATER  
REACTORS" AND NRC BULLETIN 2003-02, "LEAKAGE  
FROM REACTOR PRESSURE VESSEL LOWER HEAD  
PENETRATIONS AND REACTOR COOLANT PRESSURE  
BOUNDARY INTEGRITY"**

- REF:**
1. Letter logged TXX-03163 from Mike Blevins to the NRC dated September 19, 2003.
  2. Letter logged TXX-03195 from Mike Blevins to the NRC dated December 18, 2003.
  3. Letter logged TXX-04140 from Mike Blevins to the NRC dated July 27, 2004.

**Gentlemen:**

NRC Bulletin 2004-01, dated May 28, 2004, requested that, within 60 days of plant restart following the next inspection of the Alloy 82/182/600 pressurizer penetrations and steam space piping connections, licensees provide:

- (a) a statement indicating that the inspections described in the licensee's response to item (1)(c) of this bulletin were completed and a description of the as-found condition of the pressurizer shell, any findings of relevant indications of through-wall leakage, follow-up nondestructive examination (NDE) performed to characterize flaws in leaking penetrations or steam space piping connections, a summary of all relevant indications found by NDE, a summary of the disposition of any findings of boric acid, and any corrective actions taken and/or repairs made as a result of the indications found.

The first revision of NRC Order EA-03-009, dated February 20, 2004, requires that, within 60 days after returning a unit to operation, licensees provide a description of the inspections performed as required by the order and describe any leaks or boron deposits found during the inspection.

NRC Bulletin 2003-02, dated August 21, 2003, requested that, within 60 days of plant restart following the next inspection of the reactor pressure vessel (RPV) lower head penetrations, the subject pressurized water reactor addressees should submit to the NRC a summary of the inspections performed, the extent of the inspections, the methods used, a description of the as-found condition of the lower head, any findings of relevant indications of through-wall leakage, and a summary of the disposition of any findings of boric acid deposits and any corrective actions taken as a result of indications found.

Comanche Peak (CPSES) provides the following 60-day response for, Unit 1, requested by NRC Bulletin 2004-01 upon completion of required inspections.

Direct visual examinations were performed during the Unit 1 eleventh refueling outage (1RF11) on the following pressurizer steam space Alloy 82/182 locations:

- Safety 1/Line 6-RC-1-096, Weld TBX-1-4501-1 (Pressurizer Nozzle to Safe End)
- Safety 2/Line 6-RC-1-098, Weld TBX-1-4501-12 (Pressurizer Nozzle to Safe End)
- Safety 3/Line 6-RC-1-100, Weld TBX-1-4501-23 (Pressurizer Nozzle to Safe End)
- PORV's/Line 6-RC-1-108, Weld TBX-1-4502-1 (Pressurizer Nozzle to Safe End)
- Spray/Line 4-RC-1-091, Weld TBX-1-4503-31 (Pressurizer Nozzle to Safe End)

TXX-05216

Page 3 of 4

The examinations required removal of the insulation immediately surrounding the welds. Due to the configuration of the insulation, a large section of insulation was removed around each of the above nozzles, providing direct visual access to the pressurizer head base material. No boric acid leakage was detected on the pressurizer shell and no evidence of current or previous corrosive attack of the shell was identified.

There were no findings of through-wall boric acid leakage on any of the examination areas or their surroundings, and there were no signs of boric acid leakage from adjoining piping or components reaching the pressurizer shell. Therefore, augmented NDE was not warranted nor were any relevant indications detected by NDE. Likewise, no boric acid findings required disposition or corrective measures.

As part of an Industry Good Practice Recommendation promulgated by Electric Power Research Institute / Materials Reliability Program (MRP) Letter MRP 2004-038, the inspections were used as an opportunity to gather as-built dimensional information on all of the above welds. This information was obtained and has been forwarded to the appropriate parties in the industry.

In compliance with an Industry Mandatory Requirement promulgated by Electric Power Research Institute / Materials Reliability Program (MRP) in MRP-139, the insulation on the following additional Alloy 82/182 butt welds was removed and direct visual inspection was performed:

- Pressurizer surge line (pressurizer nozzle to safe end weld), and
- RPV hot leg nozzles (hot leg nozzle to safe end welds)

The insulation was also removed from the lower bowl of the four steam generators and visual inspection was conducted of the Alloy 82/182 steam generator bowl drains (plugged).

No boric acid leakage was detected at these locations.

In addition, results of ongoing inspection activities supplemental to the specific requirements of NRC Bulletin 2003-02 and NRC Order EA-03-09 are also provided below.

CPSES was not required under the First Revised Order EA-03-09 to conduct a Bare Metal Visual exam of the Unit 1 RPV upper head during 1RF11. However, CPSES personnel did perform a general visual assessment of the RPV upper head surface under the insulation to identify anything unusual indicative of conditions that would

TXX-05216

Page 4 of 4

warrant further investigation. No evidence of vessel head penetration nozzle leakage or cracking, or degradation of the RPV head was identified.

Similarly, CPSES commitments did not require a bare metal visual examination of the RPV lower head during 1RF11. However, CPSES personnel conducted a bare metal general visual assessment of all 58 RPV lower head bottom mounted instrument (BMI) penetrations, including essentially 100 percent of the circumference of each penetration as it enters the RPV lower head, and the areas surrounding the penetrations. No general surface area limitations were encountered on the lower head examination and no evidence of vessel head penetration nozzle leakage or cracking, or degradation of the RPV heads was identified.

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Should you have any questions, please contact Jimmy Seawright at (254) 897-0140.

I state under penalty of perjury that the foregoing is true and correct.

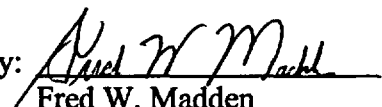
Executed on January 09, 2006.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC  
Its General Partner

Mike Blevins

By:   
Fred W. Madden  
Director, Regulatory Affairs

RJK  
Attachment

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