

May 23, 2006

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

SUBJECT: BULLETIN 2004-01, "INSPECTIONS OF ALLOY 82/182/600
MATERIALS USED IN THE FABRICATION OF PRESSURIZER
PENETRATIONS AND STEAM SPACE PIPING CONNECTIONS AT
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2
(TAC NOS. MC3470 AND MC3471)

Dear Mr. Blevins:

On May 28, 2004, the U.S. Nuclear Regulatory Commission (NRC) issued to the industry Bulletin 2004-01, "Inspections of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-Water Reactors." That bulletin informed addressees that current methods of inspecting the pressurizer penetrations and steam space piping connections fabricated from Alloy 82/182/600 materials may need to be supplemented with additional measures (e.g., bare-metal visual inspections) to detect pressurizer penetration and steam space piping connection flaws or leakage. The bulletin requested that addressees provide the NRC with information related to the materials of construction, the inspections that have been performed, and the inspections which will be performed to verify the integrity of the pressurizer penetrations and steam space piping connections.

By letter dated July 27, 2004, and by supplemental letters dated March 7 and June 27, 2005, TXU Generation Company LP (the licensee) provided its responses to items 1a, 1b, 1c, and 1d of Bulletin 2004-01 for Comanche Peak Steam Electric Station, Units 1 and 2 (CPSES). The responses described materials of fabrication and past, current and future pressurizer penetrations and steam space piping inspection programs at CPSES.

The licensee's response to item 1a reported that some of the materials used in the fabrication of the pressurizer penetrations and steam space piping connections were Alloy 82/182/600 materials. This reply required the licensee to provide further responses to the remaining items in the bulletin.

In response to item 1b, the licensee described prior inspections and inspection results of pressurizer penetrations and steam space piping connections which had been performed at CPSES. The licensee's response included the basis for concluding that CPSES satisfies the applicable regulatory requirements related to the integrity of pressurizer penetrations and steam space piping connections.

In response to item 1c in the bulletin, the licensee provided a description of the Alloy 82/182/600 pressurizer penetration and steam space piping connection inspection program that will be implemented at your facility during the next and subsequent refueling outages. The description included the items to be inspected, the percent coverage that would be performed at each location, the inspection methods to be used, the qualification standards for the inspection methods and personnel, the process used to resolve any inspection indications, the inspection documentation to be generated, and the basis for concluding that your plant will satisfy the applicable regulatory requirements related to the structural and leakage integrity of pressurizer penetrations and steam space piping connections. If leaking pressurizer penetrations or steam space piping connections are found, the licensee indicated that follow-up nondestructive examination (NDE) will be performed to characterize flaws in the leaking penetrations. The licensee provided its plans for expansion of the scope of NDE to be performed if circumferential flaws are found in any portion of the leaking pressurizer penetrations or steam space piping connections.

In response to item 1d in the bulletin, the licensee explained why the inspection program identified in the response to item 1c in the bulletin is adequate for the purpose of maintaining the integrity of the CPSES reactor coolant pressure boundary and for meeting all applicable regulatory requirements which pertain to your facility.

By letter dated June 27, 2005, you provided a response to item 2a in Bulletin 2004-01. This letter provided a statement to the NRC indicating that the inspections described in your response to item 1c of the bulletin were completed during a recent CPSES outage and a description of the as-found condition of the locations inspected was provided. The licensee also described any findings of relevant indications of through-wall leakage and follow-up 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 a description of any corrective actions taken and/or repairs made as a result of the indications found was also provided in this letter.

The NRC staff has completed its activities associated with the review of the licensee's responses to Bulletin 2004-01 and finds the licensee's response to be acceptable. It should be noted that industry commitments or staff regulatory actions may result in the need for you to modify your plans for the inspection and repair of items discussed in Bulletin 2004-01. It is the staff's expectation that you will revise your plans for the inspection and repair of items discussed in Bulletin 2004-01 consistent with other industry commitments or staff regulatory actions.

M. R. Blevins

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This closes the staff's efforts with regard to the review of the Bulletin 2004-01 responses for CPSES. Please contact me at (301) 415-1476 if you have any questions on the subject matter.

Sincerely,

/RA/

Mohan C. Thadani, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

cc: See next page

M. R. Blevins

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Sincerely,

/RA/

Mohan C. Thadani, Senior Project Manager
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Docket Nos. 50-445 and 50-446

cc: See next page

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Comanche Peak Steam Electric Station

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