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: 10 CFR 50.55a(3)(i)

CPSES-200601299
Log # TXX-06119

June 29, 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
SUPPLEMENT TO RELIEF REQUEST P-1 TO THE UNIT 1 AND UNIT 2 INSERVICE TESTING PLAN FOR PUMPS AND VALVES (ASME OM CODE 1998 EDITION, THROUGH 2000 ADDENDA; INTERVAL START DATE: AUGUST 3, 2004, SECOND INTERVAL)
TAC NUMBERS MC5385 AND MC5386

REF: 1. TXU Power letter, logged TXX-04199, from Mike Blevins to the U. S. Nuclear Regulatory Commission, dated November 30, 2004.

2. TXU Power letter, logged TXX-05176, from Mike Blevins to the U. S. Nuclear Regulatory Commission, dated November 15, 2005.

Gentlemen:

TXU Generation Company LP (TXU Power) requested relief from ASME OM Code 1998 Edition, through 2000 Addenda, for the testing of the Safeguards Building Sump Pumps at CPSES via references (1) and (2) pursuant to 10 CFR 50.55a(3)(i).

The relief request submitted per the referenced letters is being supplemented with the following information based on previous conversation with the NRC.

The Safeguards Building Sump Pumps are required to detect and mitigate passive failures in the Emergency Core Cooling System (ECCS) and Containment Spray (CT) System post-LOCA and to prevent flooding of the safety related system. These pumps have a low risk ranking and are tested every six years on a staggered test basis,

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such that at least two pumps are tested every 18 months. In our current risk analysis, internal flooding is a non-significant contributor to total Core Damage Frequency. The CPSES internal flooding analysis assumes that the Safeguards Building Sump Pumps in one train remove water but are assumed to fail in the other train due to flow path assumptions. Testing of the Safeguards Building Sump Pumps in accordance with the relief request will show that the pumps meet the operational readiness requirements of removing 50 gpm of water.

When the pumps are tested as described in reference (2), the same fixed resistance is assured each time by the system lineup. One pump at a time will pump water from the sump through its associated check valve and pump discharge valve, and into the floor drain header through the isolation valve to the Waste Holdup Tank. Testing confirms that the other pump's check valve is operating properly (it is closed) and alignment of the manual isolation valves in the open position ensures that the fixed system resistance is the same from test to test. This provides a consistent baseline for hydraulic comparison in subsequent tests. Additionally, the data obtained will be trended to determine if there is degradation.

TXU Power requests the relief request be granted as submitted.

This communication contains no new licensing basis commitments regarding CPSES.

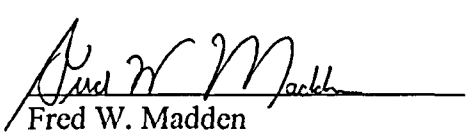
If you have any questions regarding this request, please contact Jack Hicks at (254) 897-6725.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

JCH

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