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REF: 10 CFR 50.55a(3)(i)

CPSES-200601676
Log # TXX-06143

August 23, 2006

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

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-446
REVISED RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION, RELIEF REQUEST A-1 FOR THE UNIT 2
INSERVICE INSPECTION FOR APPLICATION OF AN
ALTERNATIVE TO THE ASME BOILER AND PRESSURE VESSEL
CODE SECTION XI EXAMINATION REQUIREMENTS FOR
CLASS 1 AND 2 PIPING WELDS (INTERVAL START DATE-
AUGUST 3, 2004, SECOND INTERVAL)
TAC NUMBER MC9503**

- REF: 1. TXU Power letter, logged TXX-05204, from Mike Blevins to the NRC dated December 15, 2005.
2. TXU Power letter, logged TXX-06101, from Mike Blevins to the NRC dated June 27, 2006.

Gentlemen:

By means of the Reference 1, TXU Generation Company LP (TXU Power) previously submitted relief from the ASME Section XI code examination requirements for inservice inspection of Class 1 and 2 piping welds (Categories B-F, B-J, C-F-1, and C-F-2) for Comanche Peak Steam Electric Station (CPSES) Unit 2.

Based upon questions provided by Mr. Mohan Thadani of the NRC in an email dated June 1, 2006, TXU Power provided additional information via Reference 2.

Based upon discussions with the NRC staff on August 17, 2006, the following revised response to NRC Question 4.c (from Reference 2) is provided.

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

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NRC Question 4c: How will MRP-139 be addressed with respect to the RI-ISI Program?

TXU Response to 4c:

As stated previously, the MRP-139 issue and actions to be taken are captured in the Corrective Action Program under SMF-2005-003502 for CPSES Units 1 and 2. The RI-ISI will address these new degradation mechanisms to their previous RI- ISI rankings for the affected documents and will make the necessary changes to the plant specific documents, which for CPSES are ER-ME-107 and ER-EA-012 , Consequence Evaluation of Class 1 & Class 2 Piping in Support of ASME Code Case N-578.

These welds and examination requirements will then be captured in either the ISI or AISI Program Plans. Specifically, 10 of the 14 DM welds, containing alloy 82/182 material, will be examined under the RI-ISI Program. These welds are 8 RV safe-end to RV nozzle hot/cold leg welds and 2 Pressurizer safe-end to Pressurizer nozzle welds. The remaining 4 Pressurizer safe-end to Pressurizer nozzle welds will be addressed in the AISI Program for Unit 2. All examinations of the welds will follow the requirements of MRP-139 and will be treated like ASME Section XI Code examinations, with regards to procedures used, personnel qualifications, and coverage requirements.

This communication contains no new licensing basis commitments regarding CPSES.

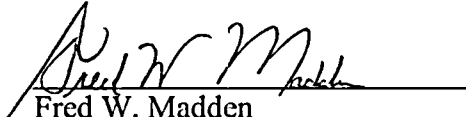
If you have any questions regarding this request, please contact Jack Hicks at (254) 897-6725.

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