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Senior Vice President &
Chief Nuclear Officer

CPSES-200700391
Log # TXX-07040

February 20, 2007

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
INSPECTION AND MITIGATION OF ALLOY 82/182
PRESSURIZER BUTT WELDS**

**REF: TXU Power letter, logged TXX-07013, from Mike Blevins to the
NRC dated January 30, 2007**

Dear Sir or Madam:

By means of the referenced letter, TXU Generation Company LP (TXU Power) previously submitted information on inspection and mitigation of Alloy 82/182 Pressurizer Butt Welds at Comanche Peak.

As requested during a phone conversation between TXU Power and the NRC Staff on February 13, 2007, TXU Power hereby provides the following additional information.

This information was discussed with Mohan Thadani, NRC Project Manager, on February 15, 2007.

The enhanced leakage monitoring program is outlined as follows.

Required elements of the enhanced leakage monitoring program

1. Daily measurement of unidentified leakage
2. Identification of unidentified leakage rates greater than either of the following limits:
 - 0.25 gpm above a baseline sustained for 72 hours with at least 0.25 gpm not confirmed from sources other than Pressurizer nozzle welds. The baseline should be established using leak rates measured within 7 days after achieving Mode 1 100% power operation following the most recent bare metal visual examination of the Pressurizer Alloy 82/182 butt weld locations
 - 0.1 gpm change from one day to the next sustained for 72 hours with at least 0.1 gpm not confirmed from sources other than Pressurizer nozzle welds.
3. Once the 72 hour evaluation period is complete and the leak rate is still elevated, place the unit in Mode 3 within 6 hours and Mode 5 within 36 hours and perform a bare metal visual inspection of unmitigated Pressurizer surge, safety, spray, and relief nozzle butt welds and safe-end butt welds containing Alloy 82/182 material.
4. A positive determination that the source of the unidentified leakage did not come from the Pressurizer will negate the requirement for shutdown and Pressurizer Alloy 82/182 butt weld bare metal examination.
5. Reports that detail inspection results of unmitigated weld examinations and any corrective or mitigative actions taken and reports on bare metal visual inspection of Pressurizer Alloy 82/182 butt welds shall be made within 60 days following restart from the plant outage in which the inspections or actions were performed.

The enhanced leakage monitoring program will supplement the existing plant programs and procedures and as such will be in place only until the Pressurizer Alloy 82/182 butt welds have been successfully mitigated.

Comanche Peak Unit 2 will implement the enhanced leakage monitoring program by March 1, 2007, and it will be in place until the Pressurizer Alloy 82/182 butt welds have been mitigated in the refueling outage scheduled to begin March 29, 2008.

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Mitigation activities for Comanche Peak Unit 1 are scheduled to be completed in the refueling outage scheduled to begin February 24, 2007. Therefore, the enhanced leakage monitoring program will not be implemented on Unit 1 based on successful mitigation of Pressurizer Alloy 82/182 butt welds in the Spring 2007 outage.

TXU Power will commit to adopt contingency plans to shutdown by December 31, 2007, if the technical information being developed by MRP (or by industry) through advanced finite element analyses does not provide reasonable assurance to the NRC that PWSCC crack conditions will remain stable and not lead to rupture without significant time from the onset of detectable leakage.

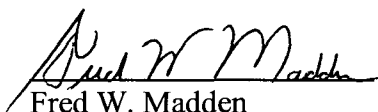
This communication contains new licensing basis commitments for CPSES Units 1 and 2 in addition to the commitments made in the referenced letter which are delineated in the attachment.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Oversight and Regulatory Affairs

JCH

Attachment: Licensing Basis Commitments for Units 1 and 2

c - James E. Dyer, Director, Office of Nuclear Reactor Regulation, NRC
Bruce S. Mallett, Administrator, Region IV, NRC
Mohan C. Thadani, Project Manager, NRC
Resident Inspectors, CPSES

Licensing Basis Commitments for Units 1 and 2

<u>Commitment Number</u>	<u>Commitment Description</u>
27419	Inspection and mitigation activities of Pressurizer Alloy 82/182 butt welds for CPSES Unit 1 are scheduled to be completed during the refueling outage in Spring 2007 and for CPSES Unit 2 are scheduled to be completed during the refueling outage in Spring 2008 (as originally committed in TXX-07013).
27420	Reports that detail inspection results of unmitigated weld examinations and any corrective or mitigative actions taken and reports on bare metal visual inspection of Pressurizer Alloy 82/182 butt welds shall be made within 60 days following restart from the plant outage in which the inspections or actions were performed (revised in TXX-07040).
27421	CPSES will provide an update to the NRC as necessary regarding changes to our leakage monitoring program by March 31, 2007 (as originally committed in TXX-07013).
27422	Comanche Peak will evaluate the feasibility of plant modifications to install diverse leakage detection capability. This may include, but is not limited to, video monitoring of Pressurizer piping, acoustic monitoring in the area of the Pressurizer, sensitive humidity monitoring, and other methods currently under evaluation. Plans for any additional capability which reliably and meaningfully adds to our ability to diagnose primary system leakage, as well as installation schedules as appropriate will be submitted to the NRC by May 31, 2007 (as originally committed in TXX-07013).
27423	If Comanche Peak Units 1 or 2 should shut down prior to presently planned inspection/ mitigation outages due to unacceptable primary system leakage, and if the leakage cannot be confirmed to originate from a source other than the Pressurizer, a bare metal visual examination of Alloy 82/182 butt weld locations on the Pressurizer will be performed to determine whether the leakage originated at those locations (as originally committed in TXX-07013).
27433	Comanche Peak Unit 2 will implement the enhanced leakage monitoring program by March 1, 2007, and it will be in place until the Pressurizer Alloy 82/182 butt welds have been mitigated in the refueling outage scheduled to begin March 29, 2008.
27434	TXU Power will commit to adopt contingency plans to shutdown by December 31, 2007, if the technical information being developed by MRP (or by industry) through advanced finite element analyses does not provide reasonable assurance to the NRC that PWSCC crack conditions will remain stable and not lead to rupture without significant time from the onset of detectable leakage.

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DATE: 02-16-07

TU ELECTRIC
TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:06

COMMITMENT TYPE : REG NUMBER: 27419 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : ZTS UNITS : 1 X 2
LIC CONTACT : JCH DELETE CODE:

SUB: (II) INSERVICE INSPECTIONS (ASME) (1A) ONGOING COMMIT-TO STATUS INC
() ()
() ()

STATUS : OPN (1X) : OPN (2X)
MILESTONE : REC (1X) : REA (2X)
SCH'D COMPLETION DATE: 04/30/2007 (1X) : 04/17/2008 (2X)
REQ'D COMPLETION DATE: (1X) :

TITLE: INSPECTION AND MITIGATION ACTIVITIES OF PZR ALLOY 82/182 BUTT WELDS

DESCRIPTION:

Inspection and mitigation activities of Pressurizer Alloy 82/182 butt welds for CPSES Unit 1 are scheduled to be completed during the refueling outage in Spring 2007 and for CPSES Unit 2 are scheduled to be completed during the refueling outage in Spring 2008.

COMMENTS:

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000013 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 01/30/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

TYPE: _____ NUM: _____ STATUS: _____ UNIT: _____
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TU ELECTRIC
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COMMITMENT DATA FORM

PAGE: 2
TIME: 13:37:06

COMMITMENT TYPE : REG NUMBER: 27419
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 01/30/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

OTHER REFERENCE:

TYPE: _____ NUM: _____ REV : _____

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PAGE: 3
TIME: 13:37:06

COMMITMENT TYPE : REG NUMBER: 27419 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

ALL COMMITMENT INFORMATION HAS BEEN REVIEWED TO BE COMPLETE AND ACCURATE
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NCTPR001.R01
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TU ELECTRIC
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COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:14

COMMITMENT TYPE : REG NUMBER: 27420 LAST UPDATE DATE: 02/16/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : ZTS UNITS : 1 X 2
LIC CONTACT : DELETE CODE:

SUB: (1A) ONGOING COMMIT-TO STATUS INC ()
() ()
() ()

STATUS : OPN (1X) : OPN (2X)
MILESTONE : RED (1X) : REB (2X)
SCH'D COMPLETION DATE: 10/01/2008 (1X) : 10/01/2009 (2X)
REQ'D COMPLETION DATE: (1X) : (2X)

TITLE: REPORTS REQUIRED WITHIN 60 DAYS FOR PZR ALLOY 82/182 BUTT WELDS

DESCRIPTION:

Reports that detail inspection results of unmitigated weld examinations and any corrective or mitigative actions taken and reports on bare metal visual inspection shall be made within 60 days following restart from the plant outage in which the inspections or actions were performed.

COMMENTS:

Reporting requirement revised from TXX-07013.

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000013 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 01/30/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

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COMMITMENT TYPE : REG NUMBER: 27420
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 02/16/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

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COMMITMENT DATA FORM

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COMMITMENT TYPE : REG NUMBER: 27420 LAST UPDATE DATE: 02/16/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

ALL COMMITMENT INFORMATION HAS BEEN REVIEWED TO BE COMPLETE AND ACCURATE
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COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:22

COMMITMENT TYPE : REG NUMBER: 27421 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : P*** UNITS : 1 X 2
LIC CONTACT : JCH DELETE CODE:

SUB: (1B) ONE TIME ACTION-TO STATUS CLS ()
() ()
() ()

STATUS : OPN (1X) : OPN (2X)
MILESTONE : (1X) : (2X)
SCH'D COMPLETION DATE: (1X) : (2X)
REQ'D COMPLETION DATE: 03/31/2007 (1X) : 03/31/2007 (2X)

TITLE: LEAKAGE MONITORING PROGRAM

DESCRIPTION:

CPSES will provide an update to the NRC as necessary regarding changes
to our leakage monitoring program by March 31, 2007.

COMMENTS:

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000013 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 01/30/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

TYPE: _____ NUM: _____ STATUS: _____ UNIT: _____
SEC: _____ REV: _____
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OTHER REFERENCE:

TYPE: _____ NUM: _____ REV : _____

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TU ELECTRIC
TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

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COMMITMENT TYPE : REG NUMBER: 27421
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 01/30/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

OTHER REFERENCE:

TYPE: _____ NUM: _____ REV : _____

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COMMITMENT TYPE : REG NUMBER: 27421 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

ALL COMMITMENT INFORMATION HAS BEEN REVIEWED TO BE COMPLETE AND ACCURATE
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COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:31

COMMITMENT TYPE : REG NUMBER: 27422 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : ZTS UNITS : N N 2
LIC CONTACT : JCH DELETE CODE:

SUB: (1B) ONE TIME ACTION-TO STATUS CLS ()
() ()
() ()

STATUS : NA (1X) : OPN (2X)
MILESTONE : (1X) : (2X)
SCH'D COMPLETION DATE: (1X) : (2X)
REQ'D COMPLETION DATE: (1X) : 05/31/2007 (2X)

TITLE: DIVERSE LEAKAGE DETECTION CAPABILITY

DESCRIPTION:

Comanche Peak will evaluate the feasibility of plant modifications to install diverse leakage detection capability. This may include, but is not limited to, video monitoring of Pressurizer piping, acoustic monitoring in the area of the Pressurizer, sensitive humidity monitoring, and other methods currently under evaluation. Plans for any additional capability which reliably and meaningfully adds to our ability to diagnose primary system leakage, as well as installation schedules as appropriate will be submitted to the NRC by May 31, 2007.

COMMENTS:

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000013 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 01/30/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

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TYPE: _____ NUM: _____ STATUS: _____ UNIT: _____
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TYPE: _____ NUM: _____ STATUS: _____ UNIT: _____
SEC: _____ REV: _____

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COMMITMENT TYPE : REG NUMBER: 27422
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 01/30/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

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COMMITMENT TYPE : REG NUMBER: 27422 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

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COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:40

COMMITMENT TYPE : REG NUMBER: 27423 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : ZTS UNITS : 1 X 2
LIC CONTACT : JCH DELETE CODE:

SUB: (1A) ONGOING COMMIT-TO STATUS INC (II) INSERVICE INSPECTIONS (ASME)
() ()
() ()

STATUS : OPN (1X) : OPN (2X)
MILESTONE : M5 (1X) : M5 (2X)
SCH'D COMPLETION DATE: (1X) : (2X)
REQ'D COMPLETION DATE: (1X) : (2X)

TITLE: BARE METAL VISUAL EXAMINATIONS OF PZR ALLOY 82/182 BUTT WELDS

DESCRIPTION:

If Comanche Peak Units 1 or 2 should shut down prior to presently planned inspection/mitigation outages due to unacceptable primary system leakage, and if the leakage cannot be confirmed to originate from a source other than the Pressurizer, a bare metal visual examination of Alloy 82/182 butt weld locations on the Pressurizer will be performed to determine whether the leakage originated at those locations.

COMMENTS:

Applicable for forced outages prior to mitigation of pressurizer Alloy 82/182 butt welds in Unit 1 and Unit 2.

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000013 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 01/30/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

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COMMITMENT DATA FORM

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COMMITMENT TYPE : REG NUMBER: 27423
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 01/30/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

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COMMITMENT DATA FORM

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COMMITMENT TYPE : REG NUMBER: 27423 LAST UPDATE DATE: 01/30/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

ALL COMMITMENT INFORMATION HAS BEEN REVIEWED TO BE COMPLETE AND ACCURATE
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TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:47

COMMITMENT TYPE : REG NUMBER: 27433 LAST UPDATE DATE: 02/16/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : P*** UNITS : N N 2
LIC CONTACT : JCH DELETE CODE:

SUB: (1A) ONGOING COMMIT-TO STATUS INC ()
() ()
() ()

STATUS : NA (1X) : OPN (2X)
MILESTONE : (1X) : REA (2X)
SCH'D COMPLETION DATE: (1X) : 04/17/2008 (2X)
REQ'D COMPLETION DATE: (1X) : (2X)

TITLE: ENHANCED LEAKAGE MONITORING PROGRAM FOR UNIT 2

DESCRIPTION:

Comanche Peak Unit 2 will implement the enhanced leakage monitoring program by March 1, 2007. It will be in place until the Pressurizer Alloy 82/182 Butt Welds have mitigated in the refueling outage scheduled to begin March 29, 2008.

COMMENTS:

Required elements of the enhanced leakage monitoring program

1. Daily measurement of unidentified leakage
2. Identification of unidentified leakage rates greater than either of the following limits:
 - a. 0.25 gpm above a baseline sustained for 72 hours with at least 0.25 gpm not confirmed from sources other than Pressurizer nozzle welds. The baseline should be established using leak rates measured within 7 days after achieving Mode 1 100% power operation following the most recent bare metal visual examination of the Pressurizer Alloy 82/182 butt weld locations.
 - b. 0.1 gpm change from one day to the next sustained for 72 hours with at least 0.1 gpm not confirmed from sources other than Pressurizer nozzle welds.
3. Once the 72 hour evaluation period is complete and the leak rate is still elevated, place the unit in Mode 3 within 6 hours and Mode 5 within 36 hours and perform a bare metal visual inspection of unmitigated Pressurizer surge, safety, spray, and relief nozzle butt welds and safe-end butt welds containing Alloy 82/182 material.
4. A positive determination that the source of the unidentified leakage did not come from the Pressurizer will negate the requirement for shutdown and Pressurizer Alloy 82/182 butt weld bare metal examination.
5. Reports that detail inspection results of unmitigated weld examinations and any corrective or mitigative actions taken and reports on bare metal visual inspection shall be made within 60 days following restart from the plant outage in which the inspections or actions were performed.

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TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

PAGE: 2
TIME: 13:37:47

COMMITMENT TYPE : REG NUMBER: 27433
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 02/16/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000040 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 02/20/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

TYPE: _____	NUM: _____	SEC: _____	STATUS: _____	UNIT: _____	REV: _____
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TYPE: _____	NUM: _____	SEC: _____	STATUS: _____	UNIT: _____	REV: _____
TYPE: _____	NUM: _____	SEC: _____	STATUS: _____	UNIT: _____	REV: _____

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COMMITMENT TYPE : REG NUMBER: 27433 LAST UPDATE DATE: 02/16/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

ALL COMMITMENT INFORMATION HAS BEEN REVIEWED TO BE COMPLETE AND ACCURATE
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TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

PAGE: 1
TIME: 13:37:59

COMMITMENT TYPE : REG NUMBER: 27434 LAST UPDATE DATE: 02/16/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

I. COMMITMENT DETAIL INFORMATION

AUTHORITY : NRC PRIORITY : G
PRIMARY ORG : OMGR UNITS : N N 2
LIC CONTACT : JCH DELETE CODE:

SUB: (1A) ONGOING COMMIT-TO STATUS INC ()
() ()
() ()

STATUS : NA (1X) : OPN (2X)
MILESTONE : (1X) : (2X)
SCH'D COMPLETION DATE: (1X) : 12/31/2007 (2X)
REQ'D COMPLETION DATE: (1X) : (2X)

TITLE: CONTINGENCY PLANS TO SHUTDOWN UNIT 2 FOR PZR ALLOY 82/182 BUTT WELDS

DESCRIPTION:

TXU Power will commit to adopt contingency plans to shutdown Comanche Peak Unit 2 by December 31, 2007, if the technical information being developed by MRP (or by industry) through advanced finite element analyses does not provide reasonable assurance to the NRC that PWSCC crack conditions will remain stable and not lead to rupture without significant time from the onset of detectable leakage.

COMMENTS:

II. COMMITMENT REFERENCE INFORMATION

SOURCE REFERENCE:

TYPE: LTR NUM: TXX-07-000040 SRC LVL: 0
SEC: REV:
PG : ISSUE DATE: 02/21/2007

OPEN/INCORPORATING/CLOSING REFERENCE:

TYPE: _____ NUM: _____ STATUS: _____ UNIT: _____
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DATE: 02-16-07

TU ELECTRIC
TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

PAGE: 2
TIME: 13:37:59

COMMITMENT TYPE : REG NUMBER: 27434
COMMITMENT REGISTER NUMBER: LAST UPDATE DATE: 02/16/2007
STATUS: OPN

II. COMMITMENT REFERENCE INFORMATION

OTHER REFERENCE:

TYPE: _____ NUM: _____ REV : _____

TYPE: _____ NUM: _____ REV : _____

.. MORE ..

NCTPR001.R01
DATE: 02-16-07

TU ELECTRIC
TOTAL PLANT SYSTEM
COMMITMENT DATA FORM

PAGE: 3
TIME: 13:37:59

COMMITMENT TYPE : REG NUMBER: 27434 LAST UPDATE DATE: 02/16/2007
COMMITMENT REGISTER NUMBER: STATUS: OPN

ALL COMMITMENT INFORMATION HAS BEEN REVIEWED TO BE COMPLETE AND ACCURATE
AT THIS TIME EXCEPT AS MARKED.

_____/_____
NAME (PLEASE PRINT) EXT. DEPARTMENT SIGNATURE DATE

_____/_____
NAME (PLEASE PRINT) EXT. DEPARTMENT SIGNATURE DATE

FOR LICENSING COMPLIANCE GROUP ONLY

TNL REVIEW: _____
SIGNATURE DATE

CT DATA ENTRY: _____
INITIALS DATE

** END OF REPORT **