

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@bpw.com

Mike Blevins
Senior Vice President &
Chief Nuclear Officer

Ref: 10CFR50.54(f)
Ref: GL 2007-01

CPSES-200700515
Log# TXX-07058

March 9, 2007

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
30-DAY RESPONSE TO NRC GENERIC LETTER 2007-01,
“INACCESSIBLE OR UNDERGROUND POWER CABLE
FAILURES THAT DISABLE ACCIDENT MITIGATION SYSTEMS
OR CAUSE PLANT TRANSIENTS”**

**REF: NRC Generic Letter (GL) 2007-01, “Inaccessible Or Underground
Power Cable Failures That Disable Accident Mitigation Systems Or
Cause Plant Transients,” dated February 7, 2007.**

Dear Sir or Madam:

NRC Generic Letter (GL) 2007-01, “Inaccessible Or Underground Power Cable Failures That Disable Accident Mitigation Systems Or Cause Plant Transients,” dated February 7, 2007, was issued to request the following information from licensees:

Addressees are requested to submit the following information to NRC within 90 days of the date of this generic letter:

- (1) *Provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (the Maintenance Rule) and for all voltage levels. Indicate the type, manufacturer, date of failure, type of service, voltage class, years of service, and the root causes for the failure.*

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

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

A127

- (2) *Describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, service water, component cooling water and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule).*

REQUIRED RESPONSE

In accordance with 10 CFR 50.54(f), the addressees are required to submit written responses to this generic letter. This information is sought to verify licensees' compliance with the regulatory requirements listed in the Applicable Regulatory Requirements section of this generic letter. The addressees have two options:

- (1) *Addressees may choose to submit written response providing the information requested above within the requested time period.*
- (2) *Addressees who choose not to provide information requested or cannot meet the requested completion dates are required to submit written responses within 30 days of the date of this generic letter. The responses must address any alternative course of action proposed, including the basis for the acceptability of the proposed alternative course of action.*

Comanche Peak Steam Electric Station (CPSES) is providing a response under Required Response – Option 2.

The twelfth refueling outage for Unit 1 started in late February 2007 and is currently scheduled to end in early May 2007. All four Unit 1 steam generators and the reactor vessel head are being replaced in this outage. Due to the extensive resources required to support these modifications, CPSES will provide the requested information by July 27, 2007. July 27, 2007 is approximately 90 days after the projected end of the refueling outage. The organizations providing support to prepare and submit the requested information for GL-2007-01 are focused on the safe implementation of the outage modifications. Diversion of the resources could have an adverse impact on these modifications. This information was discussed with the NRC Staff on February 22, 2007.

The following information provides additional justification for the extended response date:

- The 6.9 kV and 480 V power system cables are 8 kV and 600 V rated. The insulation of these cables is adequate for ungrounded systems; however, to reduce the transient over voltages due to ground faults, the systems are resistance grounded and provided with ground fault protection and detection.

- All power system cables are suitable for installation in wet or dry locations in trays, conduits or underground ducts.
- The 6.9 kV power system cables are generally Ethylene Propylene Rubber (EPR) insulated which is the most resistant insulation to water related failure mechanisms.
- All cables were tested at installation.
- CPSES cable installation was done later than many plants and therefore should be less susceptible to age related cable failures.

This communication contains one new licensing basis commitment regarding CPSES Units 1 and 2.

Number	Description of Commitment
27438	CPSES will provide the information requested by NRC Generic Letter 2007-01, "Inaccessible Or Underground Power Cable Failures That Disable Accident Mitigation Systems Or Cause Plant Transients," by July 27, 2007.

Should you have any questions, please contact Mr. Carl B. Corbin at (254) 897-0121.

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

Executed on the 9th of March, 2007.

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

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