



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

CPSES-200701065
Log # TXX-07103

June 21, 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
RESPONSE TO NRC GENERIC LETTER 2007-01, "INACCESSIBLE
OR UNDERGROUND POWER CABLE FAILURES THAT DISABLE
ACCIDENT MITIGATION SYSTEMS OR CAUSE PLANT
TRANSIENTS" (TAC NOS. MD4314 and MD4315)**

- REF:**
- (1) 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.
 - (2) TXX-07058, Letter from M. R. Blevins to the NRC Document Control Desk, dated March 9, 2007, 30 Day response to NRC Generic Letter 2007-01.
 - (3) NRC Letter Regarding Proposed Alternative Course of Action, dated May 10, 2007.

Dear Sir or Madam:

Pursuant to 10 CFR 50.54(f), the attachment to this letter provides the Comanche Peak Steam Electric Stations (CPSES) response to NRC Generic Letter 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients" (Reference 1). The generic letter requests licensees to provide a history of inaccessible or underground power cable failures and

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to describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables within the scope of 10 CFR 50.65.

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

Reference 2 included following 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.

As a result of conversation with the NRC Staff on March 20-21, 2007, TXU Power agreed to revise the response date in commitment 27438 from July 27, 2007, to June 22, 2007. The NRC confirmed the acceptability of the June 22, 2007 response date in a letter dated May 10, 2007 (Reference 3).

TXU Power's response to requested items 1 and 2 is provided in the attachment to this letter and closes commitment 27438.

There are no new commitments made to the NRC by this letter.

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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 21st of June, 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

Attachment

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

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**Response to Requested Information of NRC Generic Letter 2007-01,
Inaccessible or Underground Power Cable Failures that Disable
Accident Mitigation Systems or Cause Plant Transients**

Below is the Comanche Peak Steam Electric Station (CPSES) response to the Requested Information of NRC Generic Letter 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients." The generic letter's "Requested Information" is shown in bold followed by CPSES's response.

In a letter from James H. Riley (Nuclear Energy Institute [NEI]) to plant administrative contacts, dated March 16, 2007, NEI provided guidance for developing a response to GL 2007-01. The NRC accepted the guidance, with certain modifications, in a letter from Michael J. Case (NRC) to James H. Riley, dated April 13, 2007. The responses provided were developed using the NEI guidance as modified by the NRC letter.

NRC Requested Information Item (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.

CPSES Response to Item (1):

Research into inaccessible or underground power cable failures at CPSES revealed 1 failure(s) in power cables within the scope of 10 CFR 50.65. Table 1 below contains the information requested as well as additional information on failure type, component supported and cable identifier.

NRC Requested Information Item (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).

CPSES Response to Item (2):

The underground ductwork at CPSES is designed to slope towards manholes to avoid accumulation of water in the duct banks. The conduits embedded in concrete floors/walls inside the plant are sealed to prevent intrusion of water inside the conduits. These features eliminate or minimize cable exposure to environments of

concern known to impact cable degradation rates identified in this generic letter. Additionally all power cables at CPSES are suitable for installation in wet or dry locations in trays, conduits or underground ducts. All CPSES power cables were tested at installation.

CPSES has not implemented a specific testing or monitoring program to detect the degradation of inaccessible or underground power cables. However, during motor rework CPSES may test for motor insulation with the connected power cable.

CPSES periodically performs visual inspection for corrosion and degradation of cable tray supports and a preventive maintenance program for inspection/removal of water from manholes. These actions help to eliminate or minimize conditions known to impact cable degradation rates for cables that are within the scope of 10 CFR 50.65.

<i>Failure #</i>	<i>Failure Type (Inservice/ Testing)</i>	<i>Cable Type (Insulation Type)</i>	<i>Cable Type (Shielded, Yes/No)</i>	<i>Cable Manufacturer</i>	<i>Date of Failure</i>	<i>Type of Service (Energized/ Deenergized)</i>	<i>Component Supported</i>	<i>Cable Identifier</i>	<i>Voltage Class (nominal service voltage)</i>	<i>Voltage Class (cable rating voltage)</i>	<i>Years of Service Prior to Failure</i>	<i>Root Causes for the Failure (apparent cause)</i>
1	Testing	EPR	Yes	OKONITE	10/20/2005	Energized	Station Service Water Pump	EO100010	6.9 kV	8 kV	25 years (Installed on 02-06-1980)	Phase C Short to Ground - Cause and Location of the fault were undetermined. Cable was replaced.