



Mike Blevins
Executive Vice President
& Chief Nuclear Officer
Mike.Blevins@Luminant.com

Luminant Power
P O Box 1002
6322 North FM 56
Glen Rose, TX 76043

T 254 897 5209
C 817 559 9085
F 254 897 6652

CP- 200800410
Log # TXX-08052

Ref. # 10CFR2.201

March 27, 2008

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NO. 50-445
REPLY TO A NOTICE OF VIOLATION; EA-08-028

REFERENCE: 1. NRC letter to Mike Blevins dated February 29, 2008, "Final Significance Determination For a White Finding and Notice of Violation - Comanche Peak Steam Electric Station - NRC Special Inspection Report 05000445/2007008"
2. Letter logged TXX-08001 dated January 17, 2008 from Mike Blevins to the NRC submitting Licensee Event Report 445/07-001-00.

Dear Sir or Madam:

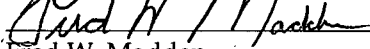
Pursuant to 10CFR2.201, Luminant Generation Company LLC (Luminant Power) hereby responds to the Notice of Violation transmitted via Reference 1. For additional information associated with this issue see Reference 2.

Should you have any questions, please contact Gary Merka at (254) 897-6613.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

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

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

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

IEDOT

Attachment

c - E. E. Collins, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak

NOTICE OF VIOLATION
(EA-08-028)

During an NRC inspection completed on January 24, 2008, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Unit 1 Technical Specification (TS) 3.8.1, "AC Sources - Operating," requires that while the plant is in Modes 1, 2, 3, or 4, two diesel generators (DGs) capable of supplying the onsite Class 1E power distribution subsystem(s) shall be operable. For the condition of one DG being inoperable, the required action is to restore the DG to an operable status within 72 hours and within 6 days from the discovery of the failure to meet the Limiting Condition for Operation (LCO), or be in Mode 3 within 6 hours and Mode 5 within 36 hours.

Contrary to the above, from November 1, 2007, through November 21, 2007, while the plant was in Mode 1, one of the two DGs capable of supplying the onsite Class 1E power distribution subsystem(s) was inoperable, and action was not taken to either restore the DG to an operable status within 72 hours or be in Mode 3 within 6 hours and Mode 5 within 36 hours. Specifically, Emergency Diesel Generator (EDG) 1-02 was made inoperable as a result of painting activities due to paint having been deposited and remaining on at least one fuel rack in a location that prevented motion required to support the operation of the EDG. This condition caused EDG 1-02 to fail to start during a surveillance test on November 21, 2007.

This violation is associated with a White significance determination process finding.

**RESPONSE TO NOTICE OF VIOLATION
(EA-08-028)**

Luminant Power agrees with the violation and the requested information follows:

1. Reason for the Violation

Although a specific root cause for this event could not be conclusively determined, Luminant Power believes that the probable cause of the condition that lead to the violation is an approximately 3/16 inch diameter paint drop that was not cleaned off of the 6L fuel pump control rack following painting activities on the Emergency Diesel Generator (EDG). This paint drop is believed to have prevented the operation of the control rack, which subsequently prevented the entire mechanical linkage from rotating. The lack of movement precluded sufficient fuel from being admitted to all of the cylinders which prevented the engine from starting.

2. Corrective Steps That Have Been Taken and the Results Achieved

Subsequent to the failure to start during the surveillance on November 21, 2007, the Unit 1 Train B EDG was immediately declared to be inoperable and troubleshooting was initiated to determine the cause for the failure to start. All painting activities in the EDG rooms were suspended until the cause could be determined and addressed. The fuel racks on the other three EDGs were manually manipulated to determine their condition. The paint residue was removed from the Unit 1 Train B EDG and it was successfully started, declared operable, and returned to service.

3. Corrective Steps That Will Be Taken to Avoid Further Violations

The Comanche Peak General Plant Painting procedure has been revised to 1) require a post maintenance "pull test" of the fuel pump control rack mechanisms to ensure they are free to operate, 2) require "as you go" inspection and clean up when painting around sensitive components, and 3) add an attachment capturing the pictures and information presently contained in the pre-job briefing note book used by painters.

This event has been included in the pre-job briefing for painters to heighten their sensitivity to the problems paint drops and spatter can cause for mechanical linkages. The information in the pre-job briefing note book used by painters has been examined by System Engineering to ensure that it contains all sensitive areas on the EDG that should not be painted.

4. Date When Full Compliance Will be Achieved.

Luminant Power has achieved full compliance.