

July 31, 2008

Mr. M. R. Blevins
Executive Vice President
& Chief Nuclear Officer
Luminant Generation Company LLC
ATTN: Regulatory Affairs
P. O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 – AUDIT OF
THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS (TAC
NOS. MD8554 AND MD8555)

Dear Mr. Blevins:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

An audit of Comanche Peak Steam Electric Station (CPSES), Units 1 and 2, commitment management program was performed at plant site during the period June 9 through June 11, 2008. The NRC staff concludes, based on the audit, that Luminant Generation Company LLC (the licensee) has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing NRC commitment changes at CPSES, Units 1 and 2. The details of the audit including the NRC staff's observations and recommendations are set forth in the enclosed audit report.

M. Blevins

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The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
Audit Report

cc w/encl: See next page

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Comanche Peak Steam Electric Station

(7/7/2008)

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

LUMINANT GENERATION COMPANY LLC

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

NEI-99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and licensing activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2 commitment management program was performed at the plant site during the period June 9 through June 11, 2008. The audit reviewed commitments made since the previous audit on September 14, 2004 (Audit Report issued on December 16, 2004). The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

ENCLOSURE

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, relief requests, etc.) or licensing activities (bulletins, generic letters, etc.). Commitments made in Licensee Event Reports or in response to Notices of Violation could be included in the sample, but the review is limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched the Agencywide Documents Access and Management System (ADAMS) for the licensee's submittals since the last audit and selected a representative sample of regulatory commitments for verification. The identified list of commitments was forwarded to the licensee with a request to locate documentation for the listed regulatory commitments ahead of the NRC staff visit.

The audit excluded the following types of commitments that are internal to licensee processes:

1. Commitments made on the licensee's own initiative among internal organizational components.
2. Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
3. Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

Luminant Generation Company LLC (the licensee) has implemented Procedure STA-509, "Commitments Management Program," which identifies the methods and site organization tools for managing development, review, and implementation of station commitments. The licensee's Procedure REG-509, "Nuclear Licensing Commitment Administration," establishes the processes, guidelines, and activities the licensee uses to manage the development, review, and implementation of commitments generated from regulatory obligations and self-imposed requirements. A commitment tracking system (CTS) database is used in conjunction with other information sources to address and track regulatory commitments.

The documents furnished by the licensee during the audit included summary sheets providing the status of the commitments and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The NRC staff reviewed the documents and summarized the selected commitments information in the attachment to this audit report.

The staff's audit was intended to confirm that the licensee has documented its implementation of its regulatory commitments made to the NRC staff as part of past licensing communications, and the commitments that had not yet been implemented or incorporated in design bases documents are captured in an effective manner for future implementation.

As discussed above, the CTS and commitments material change evaluation (CMCE) provided by the licensee's procedures STA-509 and REG-509, provide acceptable tools for the licensee to capture the NRC guidance on commitment management programs. The licensee enters the regulatory commitments made to the NRC into a database. The regulatory commitments are labeled as NRC commitments. Each commitment is numbered and described by a commitment title and brief description. Status of the commitments, implementation dates, target implementation (documents which finally capture the commitment) document information associated with each specific commitment, and comments are captured in the database. The licensee's staff is well trained in updating the commitments management program.

The NRC staff's audit of the licensee's commitment management program for CPSES, Units 1 and 2 did not identify any regulatory commitments that were not satisfied or incorporated. The licensee has maintained the database very well and all the commitments selected for this audit were easily traceable in the database. In case the commitment was already incorporated, the database provided an accurate status of the commitment providing reference to the implementation document.

The review identified the following typographical errors in the database. These errors were of no safety significance and the licensee agreed to make the corrections. These errors are also identified in the attachment to this audit report.

1. Commitment No. 27353 (TXX-05146): The database incorrectly identifies the applicable section number for procedure NDE-7.10. It should be "Section 4.4.3.1 of Attachment 8A" and not "Section 4.4.3.1".
2. Commitment No. 27355 (TXX-05146): The database incorrectly identifies the applicable section number for procedure NDE-7.10. It should be "Section 4.4.2.1 of Attachment 8A" and not "Section 4.4.2.1".
3. Commitment No. 27370 (TXX-05162, TXX-07164, and TXX-TXX-08033): The implementation date was extended to June 30, 2008. However, erroneously the commitment was closed in the database and needs to be reopened.

To ensure that the regulatory commitments are not removed/changed in future revisions to the target documents, a database search is performed to identify all the open and closed commitments against the document/procedure being revised and it is ensured that all the closed commitments are captured. Also, it ensures that the commitments are neither removed nor changed without management approval in accordance with the plant procedures.

Based on the results of the on-site audit, the NRC staff believes the licensee has implemented the regulatory commitments management program effectively in accordance with LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," and consistent with NEI 99-04.

However, the NRC staff identified one area with potential for improvement during the audit. The licensee typically identifies the commitments on the target documents by marking "C" in the margin (without identifying the specific commitment number). A review of several documents indicated that the licensee was not consistent in placing these markings on all the documents. Additionally, with the existing practice, a database search is needed to identify the specific commitment. Hence, there is a small potential for a commitment to get removed/changed during the revision process of the target document. Identifying the specific commitment on the target document with a commitment number on a consistent basis will ensure that the commitment is easily traceable and eliminates any potential for it to get changed or deleted.

The attachment to this audit report contains details of the audit and a summary of the audit results.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in NEI-99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at CPSES, Units 1 and 2, is contained in procedures STA-509 and REG-509. The primary focus of the audit was to ensure that the commitments are implemented without a change and if a change is made, it is in accordance with the approved plant procedures and with the approval of the plant's management. The audit also verified that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.2.1 Audit Results

Detailed processes are outlined by which the licensee carries out obligations under its regulatory commitments. Any changes to the commitments are processed through the CMCE process. Changes to obligatory commitments are reported to the NRC in accordance with the recommendations of LIC-105. CMCE identifies the affected commitments, their origin, original criteria, proposed changes, and justification for change. The commitment changes are documented in CMCE forms for submittal to the NRC staff.

However, no commitment changes were identified during the audit (for the commitments included in the scope of review), except for change to the implementation date. In all such cases, the NRC staff was appropriately informed and a specific NRC approval was attained.

Based on the results of the on-site audit, the NRC staff believes the licensee has implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04.

3.0 OBSERVATIONS AND RECOMMENDATIONS

The licensee typically identified the commitments on the target documents by marking "C" in the margin (without identifying the specific commitment number). However, review of several documents indicated that the licensee was not consistent in placing these markings on all the documents. Also, another database search was needed to locate the specific commitment, even if the document was marked with "C." Identifying the specific commitment on the target document with a commitment number on a consistent basis will ensure that the commitment is easily traceable and eliminates any potential for it to get changed or deleted.

4.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee has implemented the regulatory commitments management program effectively, and implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04. The specific observations and recommendations identified during the audit are detailed in Section 3.0 of the report.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Neil Harris and Robert Slough.

Principal Contributors: B. Singal
G. Lappert

Date: July 31, 2008

Attachment:
Regulatory Commitments and
Summary of Audit Results

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS
PERFORMED JUNE 9 TO JUNE 11, 2008
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-05056	NRC Bulletin 2005-01 Response to request for additional information	27334	TXU Power will notify NRC upon defining a flaw as circumferential cracking in an alloy 82/182 reactor coolant system piping attachment weld.	Incorporated into Procedure EPG-9.02 (Section 6.5.3.2), "CPSES Alloy 600 Management Program."
TXX-05146	CPSES Response to Generic Letter 2004-01	27353	A minimum of 20% of all in-service TIG sleeves will be inspected full length using the +Pt coil.	Incorporated in procedure NDE-7.10 (Section 6.2.11.3) and Attachment 8A (Section 4.4.3.1). However, the database incorrectly identifies it as Section 4.4.3.1 without a reference to the Attachment. Also, the procedure does not label it as a commitment.
		27354	Supplemental analyst training will be provided to sensitize the analysts to axial PWSCC potential within the parent tube adjacent to the nickel band and microlok band regions in TIG and Alloy 800 sleeves.	Complete (Training record SG21APTTE1).
		27355	100% of the Alloy 800 sleeves, first installed at the last outage (IRF10), will be inspected full length using the +Pt coil (required per Revision 6 of the EPRI PWR SG Examination Guideline).	Incorporated in NDE-7.10 Attachment 8A Section 4.4.2.1). However, the database incorrectly identifies it as Section 4.4.2.1 without a reference to the Attachment. Also, the procedure does not label it as a commitment.
NRC Letter Dated August 11, 2005	One-time extension of control room boundary operability from 24 hours to 14 days	27321	In order to ensure that operator protection objectives will continue to be met during the IRF11 and 2RF09, planned boundary openings, TXU Power intends to implement the following measures: (1) administrative controls to provide a designated, readily available individual(s) who can be readily contacted by the Control Room (e.g., audible range or via radio, plant gaitronics system). The individual(s) will have a method to rapidly close the opening when needed for Control Room isolation; and (2) provisions for operator action to secure the Uncontrolled Access Area Ventilation supply and exhaust fans at the onset of an accident.	Closed. One-time commitment. Procedure No. MSG-1018 for Installation and rework of penetration seals used to perform the work.

ATTACHMENT

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-05162, TXX-07164, TXX-08033	GL 2004-02 Response	27330	In response to the request for information in Part 1 of Generic Letter (revised) 2004-02, CPNPP has substantially completed an analysis of the susceptibility of the ECCS and CSS recirculation functions for CPNPP Units 1 and 2. The methodology used will conform to the intent of NEI 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology." The analyses when fully completed will provide the basis to show compliance with the applicable regulatory requirements including 10 CFR 50.46 and 10 CFR 50 Appendix A, General Design Criteria 35 and 38. The final analysis is scheduled to be completed by the June 30.	Open and is being tracked.
		27369	The Emergency Core Cooling System (ECCS) and Containment Spray System (revised) (CSS) recirculation functions under debris loading conditions at Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2 will be in compliance with the regulatory requirements listed in the Applicable Regulatory Requirements section of Generic Letter 2004-02 [Ref. 11 by June 30, 2008.	Open and is being tracked.
		27370	As a result of analyses, testing, and design evaluations not being fully (revised) completed, an update to this portion of the response (modifications and maintenance actions) will be provided no later than February 29, 2008.	Completion date extended to June 30, 2008. However, the database indicated it as CLOSED. Database to be revised to show the open status.
TXX-06174	Revise Technical Specifications regarding control room habitability in accordance with TSTF-448	27413	TXU power commits to the guidance of NEI 99-03, Revision 0, "Control Room Habitability Assessment Guidance" dated June 2001 as reflected in the proposed changes to the TS and TSB.	Implemented with Amendment 136 issued on March 26, 2007.
TXX-07058 TXX-07103	GL 2007-01 Response	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 20, 2007.	Closed by letter TXX-07103, dated June 20, 2007.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-07106	Revision to the operating license and TS 1.0 to revise thermal rated power from 3458 MWt to 3612 MWt.	27448	The 4.5% uprate conditions will be considered as part of the restoration of the containment coating qualifications supporting resolution of Generic Safety Issue - 191 Containment sumps.	Open and is being tracked.
		27467	<p>A small load reduction test of at least 50 MWe will be performed to confirm the expected integrated response of the following automatic control systems at SPU conditions;</p> <p>*Rod Control System *Steam Generator Water Level Control System *Pressurizer Level Control System</p> <p>This load reduction test, along with routine startup and surveillance testing, post modification testing, and power ascension testing and monitoring will provide the bases for confirmation of predicted and extrapolated system dynamic behavior. The results of this testing and monitoring, combined with SPU analyses, will be used to ensure that the plant systems, including the above identified automatic control systems are capable of performing safely and reliably in the uprated condition.</p>	Open and is being tracked.
NRC Letter Dated January 25, 2008, TXX-07174	Revision to Technical Specifications – TSTF 439, Revision 2	27488	There shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single continuous occurrence of failing to meet the LCO for TS 3.7.5, Auxiliary Feedwater (AFW) System, TS 3.8.1, AC Sources – Operating, and TS 3.8.9, Distribution Systems – Operating. These administrative controls shall ensure that the Completion Times for those Conditions are NOT inappropriately extended. The administrative controls will ensure that the Completion Time is not extended beyond the additive Completion Times of the two (2) Required Actions for restoration of OPERABILITY unless a risk evaluation is performed. If Unit Operation within an LCO will exceed the maximum Completion Time, then either the shutdown Condition within the LCO should be entered OR a risk evaluation shall be performed and the risk impact managed under the Configuration Risk Management Program (CRMP).	Closed. Incorporated in Section 6.4.4 of Procedure No. ODA-308, (LCO Tracking Program).

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-08032	License Amendment Request – Methodology used to establish core operating limits	3465995	Luminant power will provide data regarding the measurements and results from Technical Specification Surveillance Requirement (SR) 3.2.1.1 following six months of Unit 2 cycle 11 operation.	Open and is being tracked.
TXX-06184	Actuation of Reactor Protection System (Licensee Event Report 446/06-002-00)	27416	Operating procedures will be reviewed related to the sequencing of secondary pumps to ensure the MFW pump steam control valve remains in an effective throttling range.	Licensee reviewed procedure IPO-003A (Power Operations) and made the required changes.
		27417	Training will be developed on low power events to ensure that lessons learned from this event are shared.	Incorporated into the training procedure (Activity No. TR-2006-003632-01-00).
		27418	Secondary system controller responses for main steam indicated flow and changes in the dampening for control inputs in the secondary system will be evaluated.	Closed with EVAL-2006-003632-04-00.
TXX-07006, TXX-08059	Implementation details for the Phase 2 and Phase 3 mitigation strategies.	27427	TXU Power will include the SFP external makeup strategy and SFP external spray strategy as described in the general description in Attachment 1 in plant guidelines (Tables A.2-1 - A.2.6)	Incorporated into the Station Significant Event Guidelines (SSEG) -1 Manual.
		27428	TXU Power will include the command and control enhancement strategies as described in the general description in Attachment 1 in plant guidelines (Table A.3-1)	Incorporated into the SSEG -1 Manual.
		27429	TXU Power will fully implement the PWR mitigation strategies as described in the general description in Attachment 1 in plant procedures and/or guidelines (Tables A.4-1 - A.4-7)	Incorporated into the SSEG -1 Manual.
		27430	TXU Power will list the viable site specific reactor/containment strategies that could be used by emergency response organization or plant personnel in appropriated procedures and/or guidelines.	Incorporated into the SSEG -1 Manual.
		27431	TXU Power will conduct training on the mitigation strategy procedures and/or guidelines. Training on the strategies will be commensurate with the level of training provided for Severe Accident Management Guidelines (SAMGS).	Training has been completed. The closure documentation was under sign-off process at the time of the audit. The commitment was open in the database and will be closed after the documentation has been signed off by the management.
		27432	TXU Power will provide the NRC with a disposition of our final strategies and plans, including identification of procedures, processes or guidelines per the schedule in Attachment 2 [of the referenced letter].	Closed with the issuance of letter TXX-08059, dated April 7, 2008 (letter erroneously dated April 7, 2009).

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-07013, TXX-07040	Inspection and mitigation of Alloy 82/182 pressurizer butt welds	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).	Closed. Unit 1 completed in April 2007 (1RF12) and Unit 2 completed in April 2008 (2RF10).
		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).	Closed. Unit 1 report issued on June 19, 2007 (TXX-07091), and Unit 2 report issued on April 24, 2008 (TXX-08055)
		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).	Closed. Finalized and accepted by NRC Confirmatory Action Letter dated March 20, 2007.
		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).	Closed. NEI letter dated May 31, 2007, stated Diverse Capability not required.
		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).	Closed. Action performed during scheduled refueling outages. There was no unplanned outage.
		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.	Closed. Action completed with weld overlays.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		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.	Closed. Action completed with weld overlays.
TXX-08054	License amendment request associated with methodology used to establish core operating limits	3475619	Luminant Generation Company LLC will revise, as appropriate, the W(z) curves to ensure they are representative of the current core conditions should the value of $W(z) \cdot [\text{Predicted } P(z) / \text{Measured } P(z)]$ become less than 1.04. The revised W(z) curves will be calculated prior to performance of the next required surveillance. Since the W(z) function is set to 1.0 near the top and bottom of the core, this commitment does not apply to the FQ(z) measured in the exclusion zones.	NRC Requirements incorporated into procedure NUC-201. The licensee committed to report the results of the surveillance to the NRC. The commitment is open and being tracked.
TXX-08031	Revision to the operating license and TS 1.0 to revise thermal rated power from 3458 MWt to 3612 MWt.	3458447	A table of maximum stress values at the steam generator nozzles will be prepared for Units 1 and 2. In addition, a table of maximum stress values at a critical location closest to the containment penetration will be prepared for Units 1 and 2. These tables will be provided for your review by March 7, 2008.	Closed, information provided in letter TXX-08047, dated March 6, 2008.
		3458484	A bounding temperature profile will be incorporated into Prior to design drawings and used as an input for EQ packages. The Unit 1, Cycle 13 PAOT margin will be recalculated using this revised profile.	Closed. Information provided in letter TXX-08078, dated May 14, 2008. The licensee was in the process of closing the commitment in the database.