



Luminant

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Log # TXX-09081

Ref. # 10 CFR 50.55a(g)

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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
REQUEST TO DELAY THE CODE OF RECORD FOR THE UNIT 1 INSERVICE
INSPECTION (ISI) PROGRAM
1998 EDITION OF ASME CODE, SECTION XI, 2000 ADDENDA
UNIT 1 INTERVAL DATES: AUGUST 13, 2000 – AUGUST 12, 2010
UNIT 2 INTERVAL DATES: AUGUST 3, 2004 – AUGUST 2, 2014

REFERENCES: 1. Luminant Power letter, logged TXX-00041, from C. L. Terry to the U. S. Nuclear
Regulatory Commission (NRC), dated February 24, 2000.
2. NRC Letter from David H. Jaffee to C. L. Terry , dated June 29, 2000 (TAC NO.
MA8310)

Dear Sir or Madam:

Luminant Generation Company LLC (Luminant Power) requests to delay the update of the Code of Record (1998 Edition of ASME Code, Section XI, 2000 Addenda) for the Unit 1 Inservice Inspection (ISI) Program until the time of the required update for Unit 2. The third ten-year ISI interval for Unit 1 starts August 13, 2010. The code update for the third ten-year ISI interval for Unit 2 starts August 3, 2014.

Luminant Power had previously requested to delay the update of the Code of Record for the second interval of the Unit 1 ISI Program until the time of the required update for Unit 2 via Reference 1. This request was approved by the NRC via Reference 2.

In the interim prior to the required code update of Unit 2, Unit 1 will continue with its ISI in accordance with the requirements of the code edition of the second interval and will be subject to any additional ISI related requirements that may be mandated by subsequent rulemaking. Having both units on the same Code of Record provides many implementation benefits which will maintain or enhance the existing level of quality and safety and provides cohesive programs for ISI, Repairs/Replacements and Pressure Testing. Having two separate ASME Code years implemented on a two unit station can create procedural and programmatic differences that could potentially increase the likelihood of implementation errors.

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

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The Unit 1 ISI inspections will continue with a 10-year program plan for the third interval that references the same Code of Record used for the second interval (1998 Edition of ASME Code, Section XI, 2000 Addenda). All required piping and components will be selected, scheduled and examined in accordance with these Code requirements. At the time of the required Unit 2 Code update, the Unit 1 Program Plan will be revised to implement the updated Code of Record for the remainder of the Unit 1 third inspection interval, which is expected to include the second and third inspection periods in their entirety (approximately seven years).

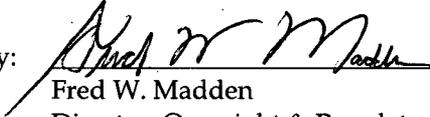
This communication contains no new licensing basis commitments regarding Comanche Peak Units 1 and 2.

Should you have any questions, please contact Mr. Jack Hicks at (254)897-6725.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: 

Fred W. Madden

Director, Oversight & Regulatory Affairs

c - E. E. Collins, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak
A. Jones, TDLR
Brian Welch ANII, Comanche Peak