



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 29, 2010

Mr. Rafael Flores
Senior Vice President and
Chief Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1 – REQUEST FOR
ADDITIONAL INFORMATION RELATED TO REQUEST FOR DELAYING THE
CODE OF RECORD FOR INSERVICE INSPECTION PROGRAM (TAC
NO. ME1703)

Dear Mr. Flores:

By letter dated July 14, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML092030380), Luminant Generation Company LLC (the licensee) requested approval to delay the update of the Code of record (1998 Edition of American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, 2000 Addenda) for the Comanche Peak Steam Electric Station (CPSES), Unit 1 Inservice Inspection (ISI) Program until the time of the required update for CPSES, Unit 2.

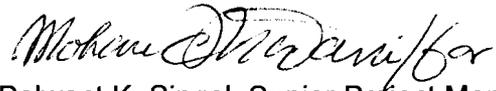
The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and determined that additional information is needed in order to complete the review. A draft copy of the request for additional information was forwarded to Mr. Jack Hicks of your staff on January 21, 2010, via e-mail. The licensee informed the NRC staff via e-mail on January 26, 2010, that its staff understands the request and no further discussions with the NRC are needed. Mr. Hicks agreed to provide the final response within 30 days from the date of this letter.

R. Flores

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If you have any questions, please contact me at 301-415-3016 or via e-mail at balwant.singal@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Balwant K. Singal". The signature is fluid and cursive, with the first name being the most prominent.

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

Docket No. 50-445

Enclosure:
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

DELAY UPDATE OF CODE OF RECORD

LUMINANT GENERATION COMPANY LLC

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1

DOCKET NO. 50-445

By letter dated July 14, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML092030380), Luminant Generation Company LLC (the licensee) requested approval to delay the update of the Code of record (1998 Edition of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2000 Addenda) for the Comanche Peak Steam Electric Station (CPSES), Unit 1 Inservice Inspection Program until the time of the required update for CPSES, Unit 2.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and determined that the following additional information is needed in order to complete the review. On January 26, 2019, it was agreed that the licensee will provide the additional information being requested within 30 days from the date of the NRC letter forwarding the request for information.

1. The ASME Code, Section XI, 1998 Edition through the 2000 Addenda, allows the use of IWA-4340, Mitigation of Defects by Modification, but the NRC staff has concerns about some of the provisions of this paragraph. If the Code of record were updated at the frequency intended by Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, the use of this paragraph would not be permitted. If the request to delay the Code of record is authorized, does the licensee intend to use the provisions of IWA-4340? If the licensee intends to use the provisions of IWA-4340, please provide justification for its use and discuss whether the staffs concerns, documented in the proposed rule for amending 10 CFR 50.55a, Code and standards" (ADAMS Accession No. ML031740349), are valid.
2. The requirements to pressure test Class 1, 2, and 3 mechanical joints undergoing repair and replacement activities were deleted in the 1999 Addenda of ASME Code Section XI. Therefore, pressure testing of mechanical joints is not required by Section XI, when performing IWA-4000 repair and replacement activities and when using the 2000 Addenda of Section XI, but would be required if the Code of record were updated at the frequency intended by 10 CFR 50.55a(b)(2)(xxvi). If the request to delay the Code of record is authorized, does the licensee intend to perform pressure testing of mechanical joints in accordance with the requirements of IWA-4540(c) of the 1998 Edition of Section XI? If pressure testing of mechanical joints will not be performed, please provide justification, and discuss how the public health and safety will be adequately protected.

Enclosure

R. Flores

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If you have any questions, please contact me at 301-415-3016 or via e-mail at balwant.singal@nrc.gov.

Sincerely,

/RA by Mohan C. Thadani for/

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

Docket No. 50-445

Enclosure:
As stated

cc w/encl: Distribution via Listserv

DISTRIBUTION:

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JWallace, NRR/DCI/CPNB

ADAMS Accession No.: ML100271802

*Memo dated 1/19/10

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DCI/CPNB/BC	NRR/LPL4/BC	NRR/LPL4/PM
NAME	BSingal	JBurkhardt	TLupold*	MMarkley	BSingal MThadani for
DATE	1/28/10	1/28/10	1/19/10	1/29/10	1/29/10

OFFICIAL AGENCY RECORD