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CP-201001404
TXX-10147

Ref: 10 CFR 50.54(f)
GL 2007-01

December 9, 2010

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP) DOCKET NOS. 50-445 AND 50-446, REVISED RESPONSE TO NRC GENERIC LETTER 2007-01, "INACCESSIBLE OR UNDERGROUND POWER CABLE FAILURES THAT DISABLE ACCIDENT MITIGATION SYSTEMS OR CAUSE PLANT TRANSIENTS"

REFERENCE:
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.
4. TXX-07103, Letter from M. R. Blevins to the NRC Document Control Desk, dated June 21, 2007, "Response to NRC Generic Letter 2007-01, 'Inaccessible or Underground Power Cable Failures That Disable Accident Mitigation Systems or Cause Plant Transients.'"
5. NRC Letter Regarding, "Comanche Peak Nuclear Power Plant - NRC Component Design Bases Inspection Report 05000445/2010006; 05000446/2010006; Preliminary White Finding," dated November 19, 2010.

Dear Sir or Madam:

In Reference 1 above, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2007-01, "Inaccessible or Underground Power Cable Failures That Disable Accident Mitigation Systems or Cause Plant Transients." In Reference 2, Comanche Peak Steam Electric Station (CPSES), now referred to as Comanche Peak Nuclear Power Plant (CPNPP) committed to provide a response to the GL by July 27, 2007. Per discussions with the NRC Staff on March 20-21, 2007, TXU Power (now referred to as Luminant Generation Company LLC (Luminant Power)) agreed to revise the response date 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). Reference 4 above provided CPNPP's response to the GL. Reference 5 contains an NRC finding related to the accuracy of the CPNPP response. The attachment to this letter revises the response to the GL in Reference 4 in response to the NRC finding in Reference 5. Changes from previous response are indicated by a change bar in the right margin.

This communication contains no new commitments.

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NRR

Should you have any questions, please contact Ms. Tamera J. Ervin-Walker at (254) 897-6902.

I state under penalty of perjury that the foregoing is true and correct.

Executed on December 9, 2010.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

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

TJEW

Attachment

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

ATTACHMENT

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 Nuclear Power Plant (CPNPP) revised 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 CPNPP's response. This response has been updated to reflect the current status.

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.

CPNPP Response to Item (1):

Research into inaccessible or underground power cable failures at CPNPP revealed 1 failure(s) 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).

CPNPP Response to Item (2):

CPNPP inspects for and removes water (if required) from manholes. CPNPP performs periodic monitoring of certain underground electric cables. Activities are currently performed to inspect and remove water as necessary from electrical cable vaults associated with the Service Water and Circulating Water systems.

CPNPP personnel are actively involved with industry organizations with the goal of producing a comprehensive proceduralized buried cable program in alignment with industry practices and regulatory expectations. In response to GL-2007-01 and recent NRC IR communications on buried cable issues dated November 19, 2010, CPNPP plans to develop a buried cable management program in accordance with the EPRI cable management guides.

In conclusion, with these collaborative efforts, CPNPP will be able to address buried cable issues and other cable aging issues in a complete and comprehensive manner.

Table 1. History of Inaccessible or Underground Power Cable Failures

Failure #	Failure Type (Inservice/ Testing)	Cable Type (Insulation Type)	Cable Type (Shielded, Yes/No)	Cable Manufacturer	Date of Failure	Type of Service (Energized/ Deenergized)	Component Supported	Cable Identifier	Voltage Class (nominal service voltage)	Voltage Class (cable rating voltage)	Years of Service Prior to Failure	Root Causes for the Failure (apparent cause)
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 are undetermined. Cable was replaced.

*Note: The cable failure was identified during post-work testing associated with the motor replacement during a refueling outage.