Luminant

Rafael Flores
Senior Executive Vice President
& Chief Nuclear Officer
rafael.flores@Luminant.com

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

T 254 897 5550
C 817 559 0403
F 254 897 6652

January 20, 2011

CERTIFIED MAIL: **7010 1870 0001 0617 5224**

TXX#11009

Texas Commission on Environmental Quality
Region 4
2309 Gravel Drive
Fort Worth, Texas 76118-6951

Attn: Ms. Merissa Ludwig
Environmental Investigator

Comanche Peak Nuclear Power Plant
PWS #2130016
Comprehensive Compliance Investigation Findings Response
Track #418761

Dear Ms. Ludwig:

This letter and attachment are provided in response to the letter of 13 December 2010 addressing the alleged violation noted at the above referenced Public Water System. The documentation for the interior surface inspection of the system's two pressure tanks are in accordance with 30 TAC 290.46(m)(1)(B).

The Company trusts that the submission of this documentation completes the required actions and resolves the alleged violation noted in the investigation summary. If you require additional information, please contact Mr. David Rutledge at 214-875-8296 or by e-mail david.rutledge@luminant.com.

Sincerely,

Rafael Flores

By: Kim Mireles

DER/attachment

IE01
NRR

xc: US Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

LUMINANT COMANCHE PEAK NPP
PWS #2130016

PRESSURE TANK INTERIOR SURFACE INSPECTION

The interior surfaces of the two pressure tanks utilized in the PWS must be inspected at a minimum of 1/5 years in accordance with 30 TAC 290.46(m)(1)(B) in addition to the routine required 1/year inspection of the tank's operation, exterior coatings, and operational appurtenances.

> **30 TAC 290.46(m)(1)(B):**
> Pressure tank inspections must determine that the pressure release device and pressure gauge are working properly, the air-water ratio is being maintained at the proper level, the exterior coatings systems are continuing to provide adequate protection to all metal surfaces, and the tank remains in watertight condition. Pressure tanks provided with an inspection port must have the interior surface inspected every five years.

Inspections were performed:

Plant ("High Tank") Pressure Tank	12/20/2010
NOSF Pressure Tank	01/09/2011

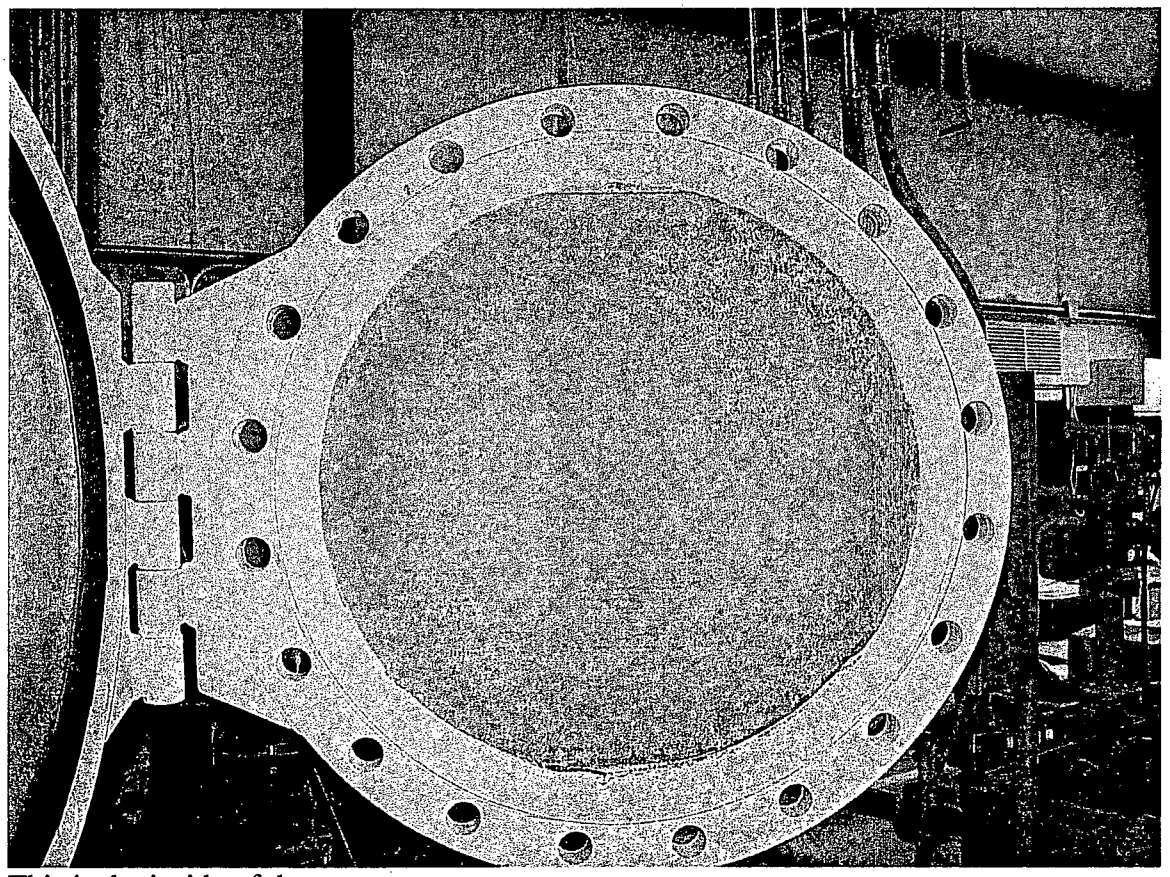
LUMINANT COMANCHE PEAK NPP
PWS #2130016

PRESSURE TANK INTERIOR SURFACE INSPECTION

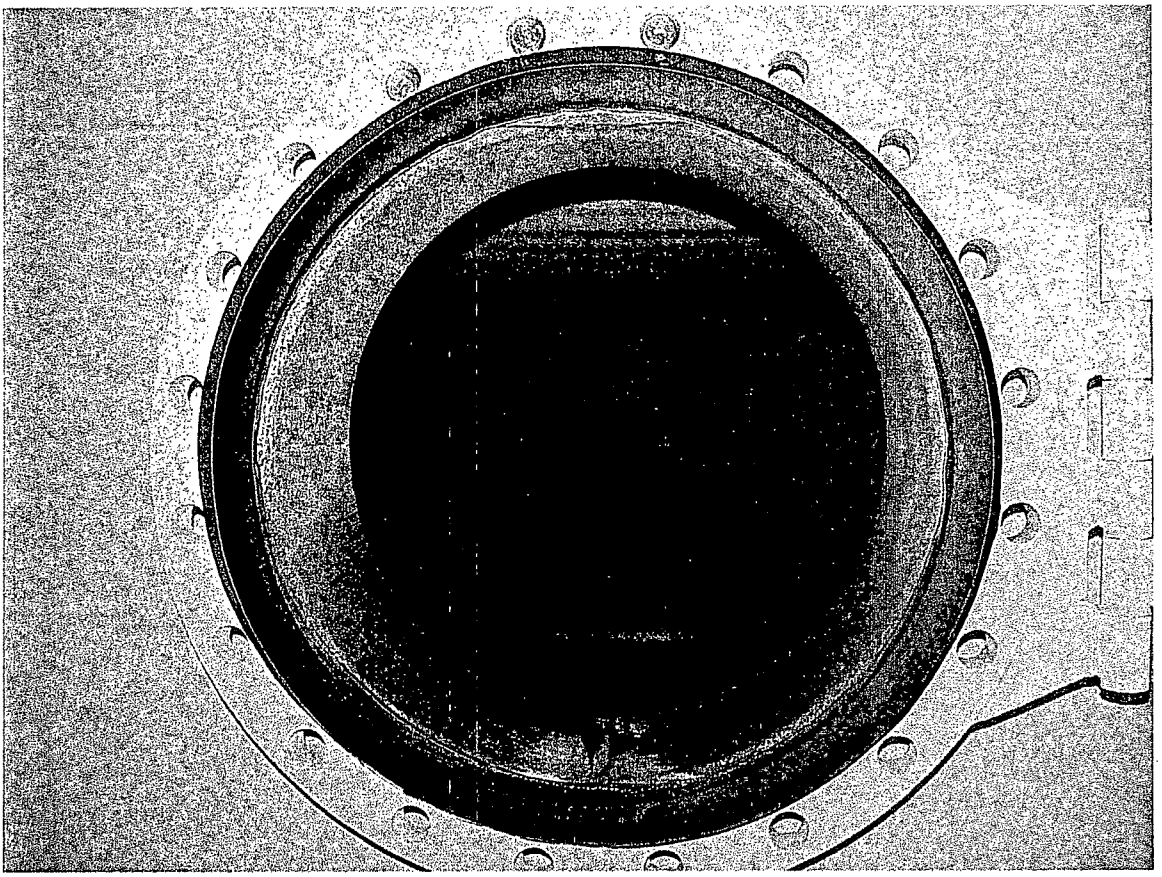
PLANT ("HIGH TANK") PRESSURE TANK

Inspection Date: 12/20/2010, ~15:00 hours

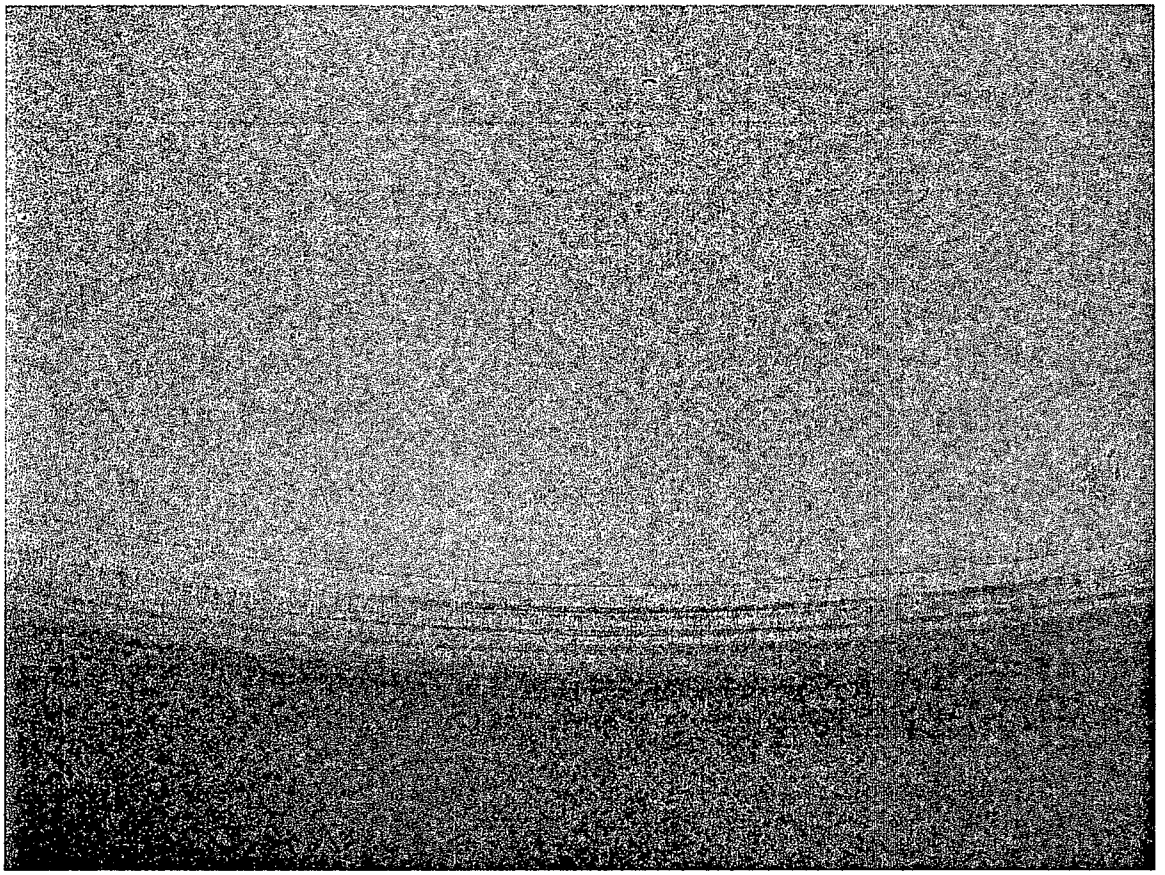
Generally the interior coating of the tank was in good shape, with only minor corrosion noted, and nothing that appeared to compromise the integrity of the tank. The man way hatch and gasket were also in good shape. A thin layer of loose silt was noticed on a portion of the bottom of the tank near the tank drain. The small amount of accumulated sediment is indicative of source water iron which is precipitated through oxidation by chlorination. The areas of minor corrosion are noted in the photographs. The following are pictures of the interior of the tank.



This is the inside of the man way cover

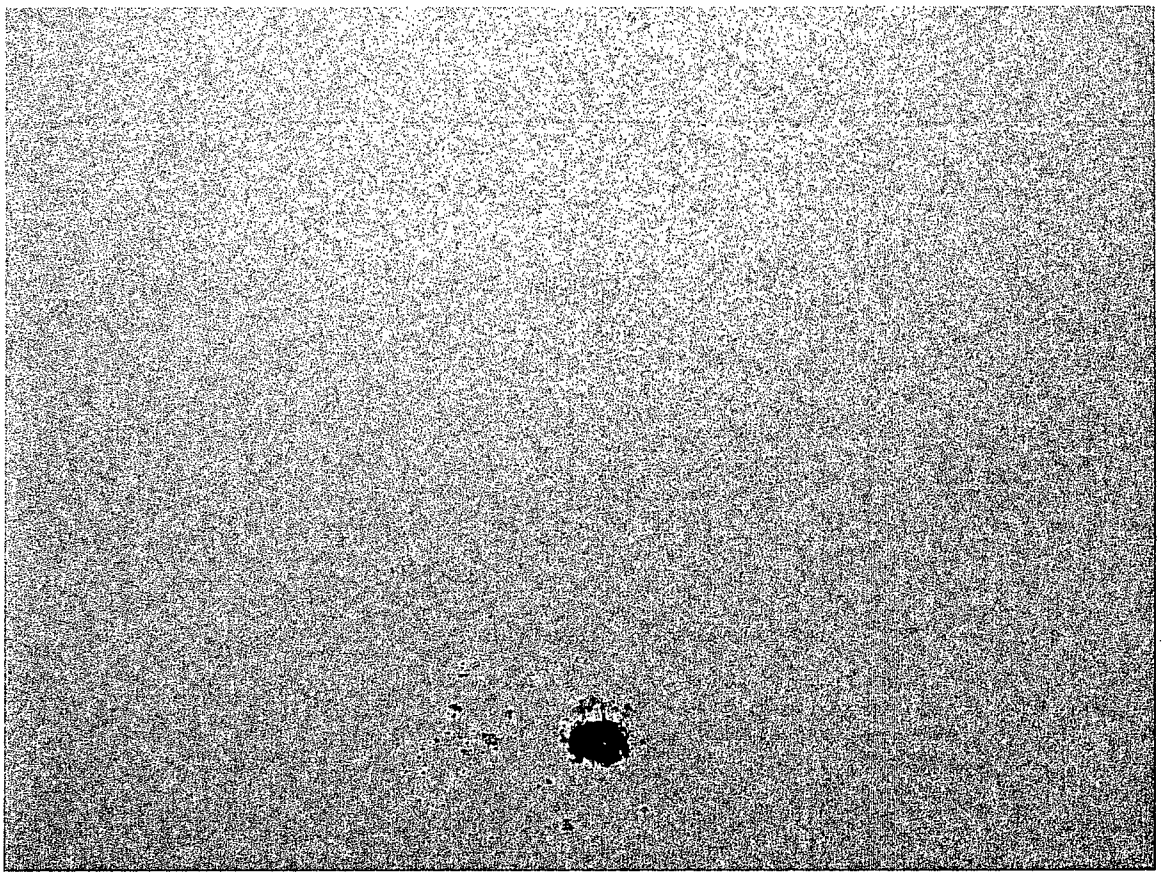


This photo shows the gasket and the man way opening

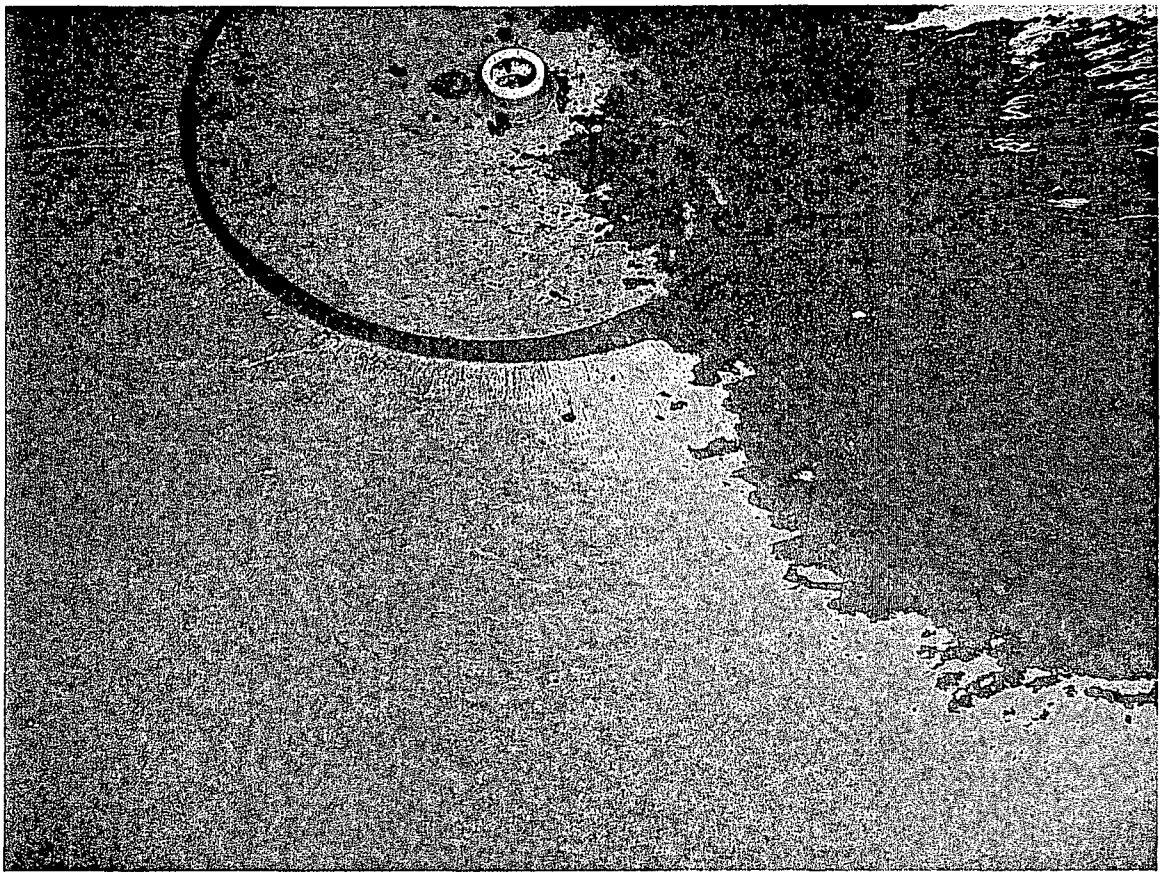


This is looking in the man way to the opposite side of the tank. Notice the fine layer of material that defines the typical operating water level.

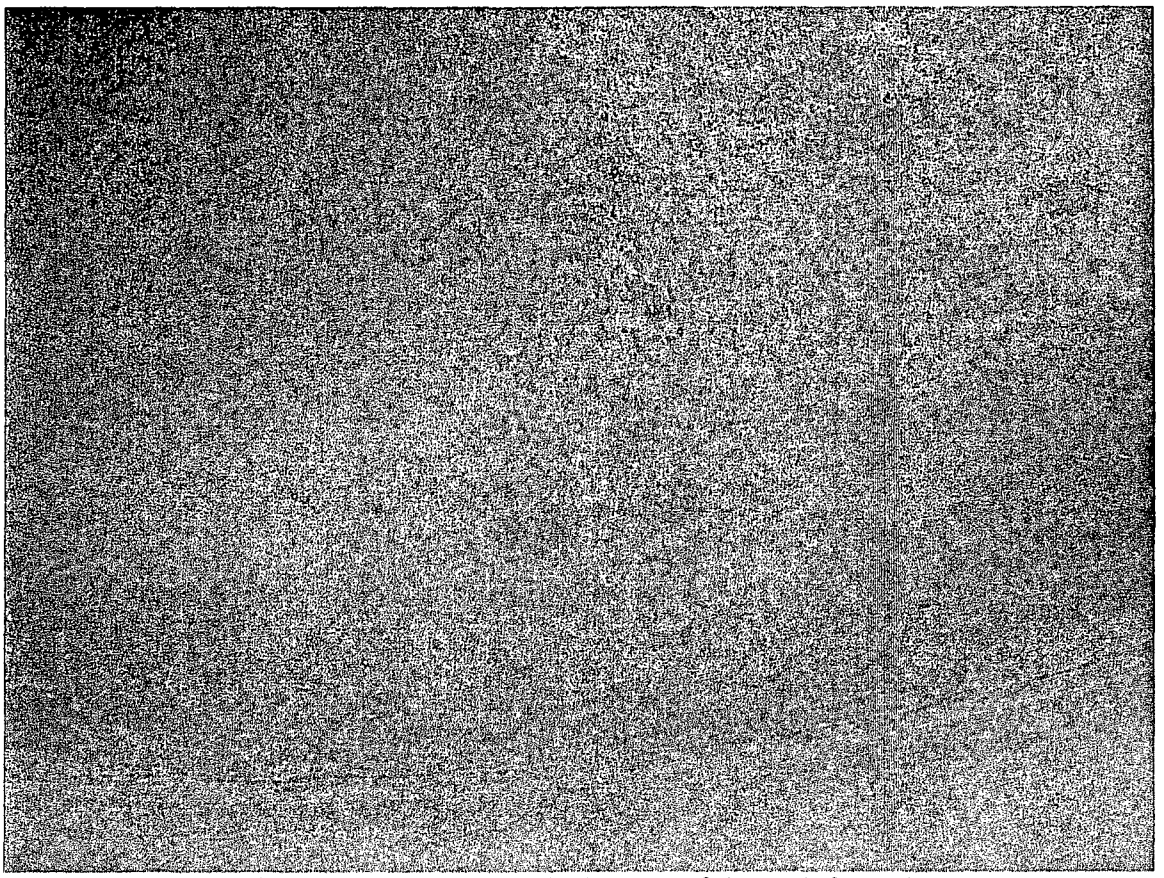
This is the view of the interior of the tank looking to the left from the man way.



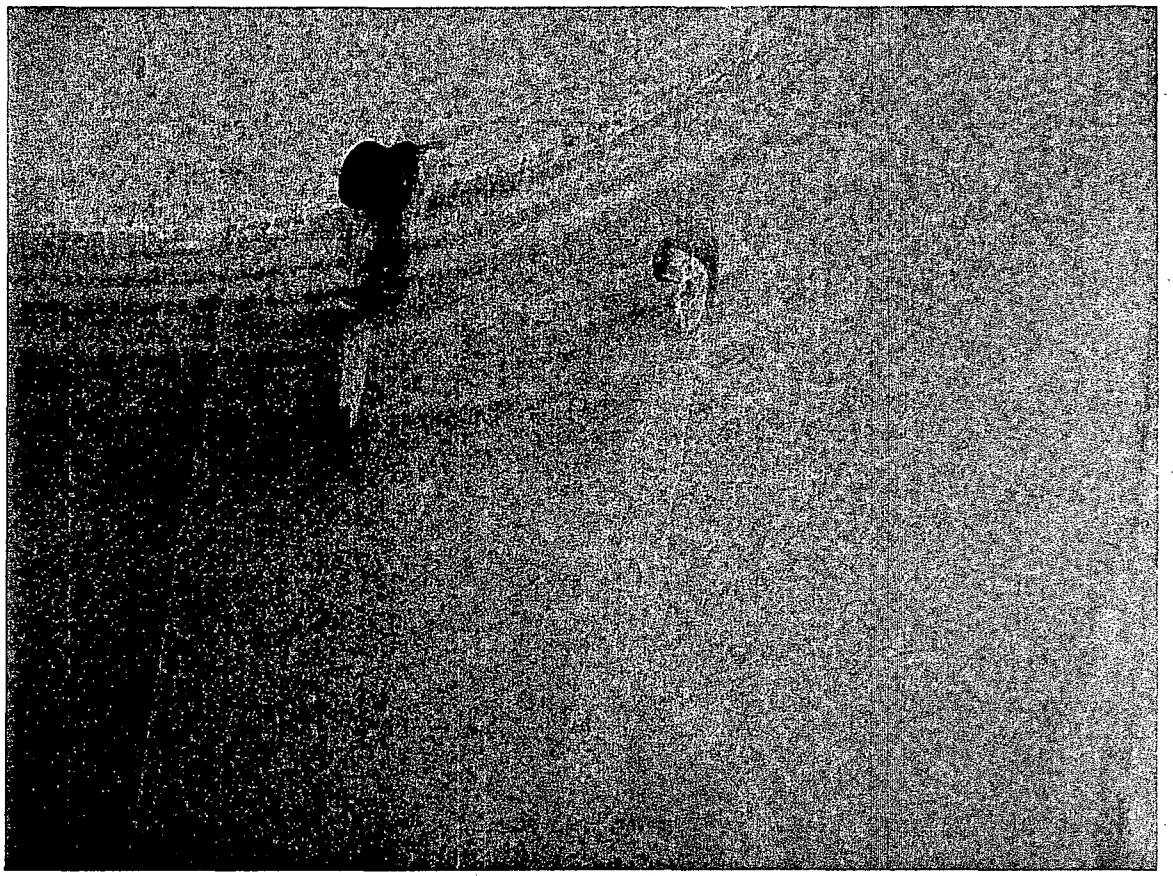
This is the penetration at the top of the tank, where the air pressure is introduced to the tank.



This is the bottom drain on the tank, with some residual silt.



This is the view looking straight down to the bottom of the tank from the man way.



This is the view to the right of the man way, showing the normal inlet/outlet to the tank, and the penetration for the level detection system.

Inspection performed by: Gordon Dalby

Signature: _____ Date: _____

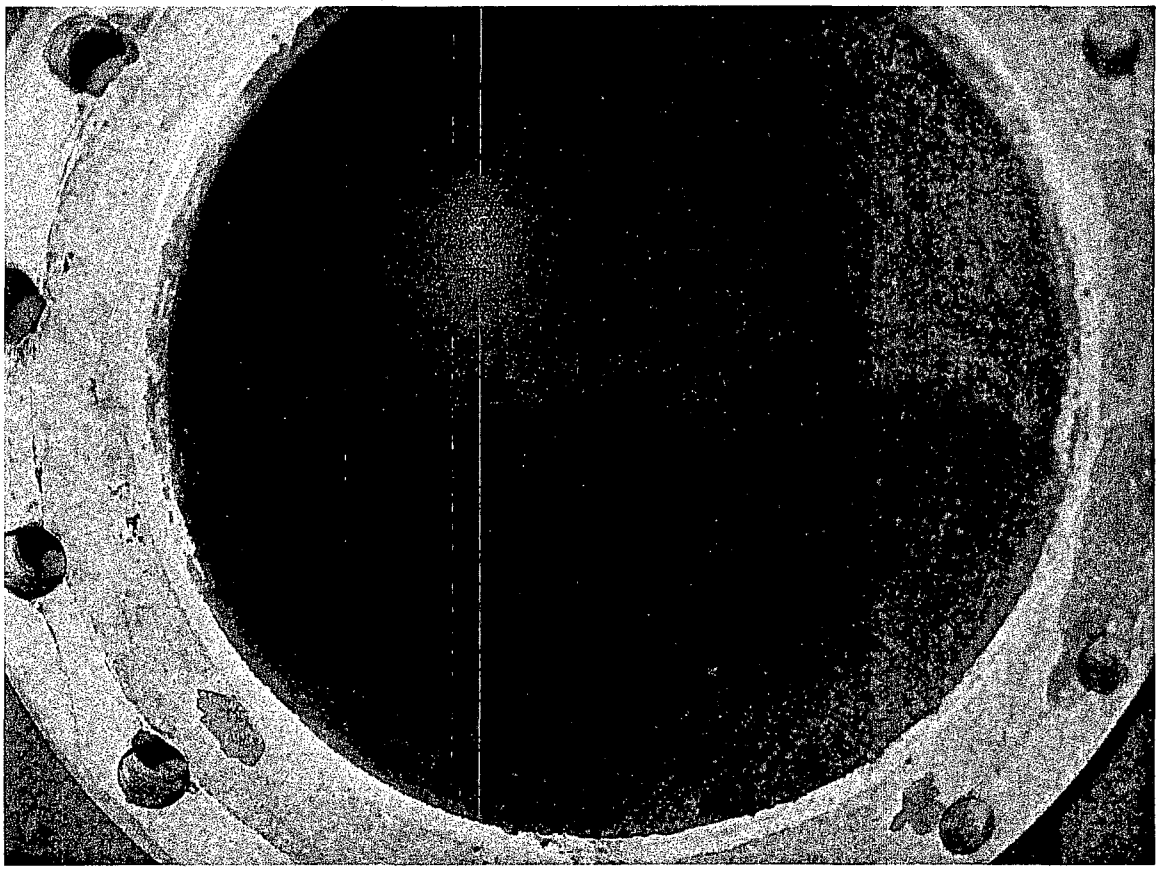
LUMINANT COMANCHE PEAK NPP
PWS #2130016

PRESSURE TANK INTERIOR SURFACE INSPECTION

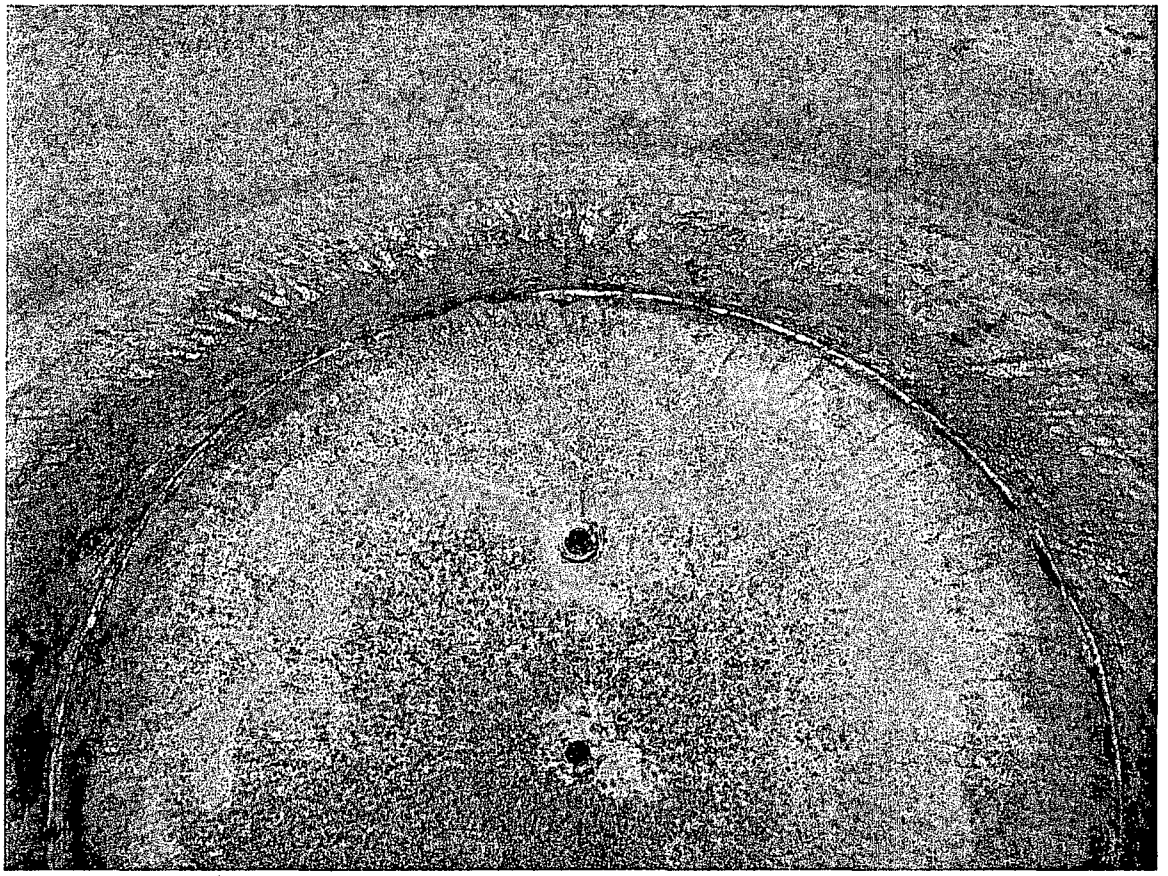
NOSF PRESSURE TANK

Inspection Date: 01/09/2011, ~09:00 hours

Generally the interior coating of the tank was in fair shape, with areas of general corrosion noted, but nothing that appeared to compromise the integrity of the tank. The man way hatch was also in good shape. The gasket was replaced. A thin layer of corrosion products was noticed on the portion of the tank above the water line. The bottom of the tank was clean and free of silt. The following are pictures of the interior of the tank.

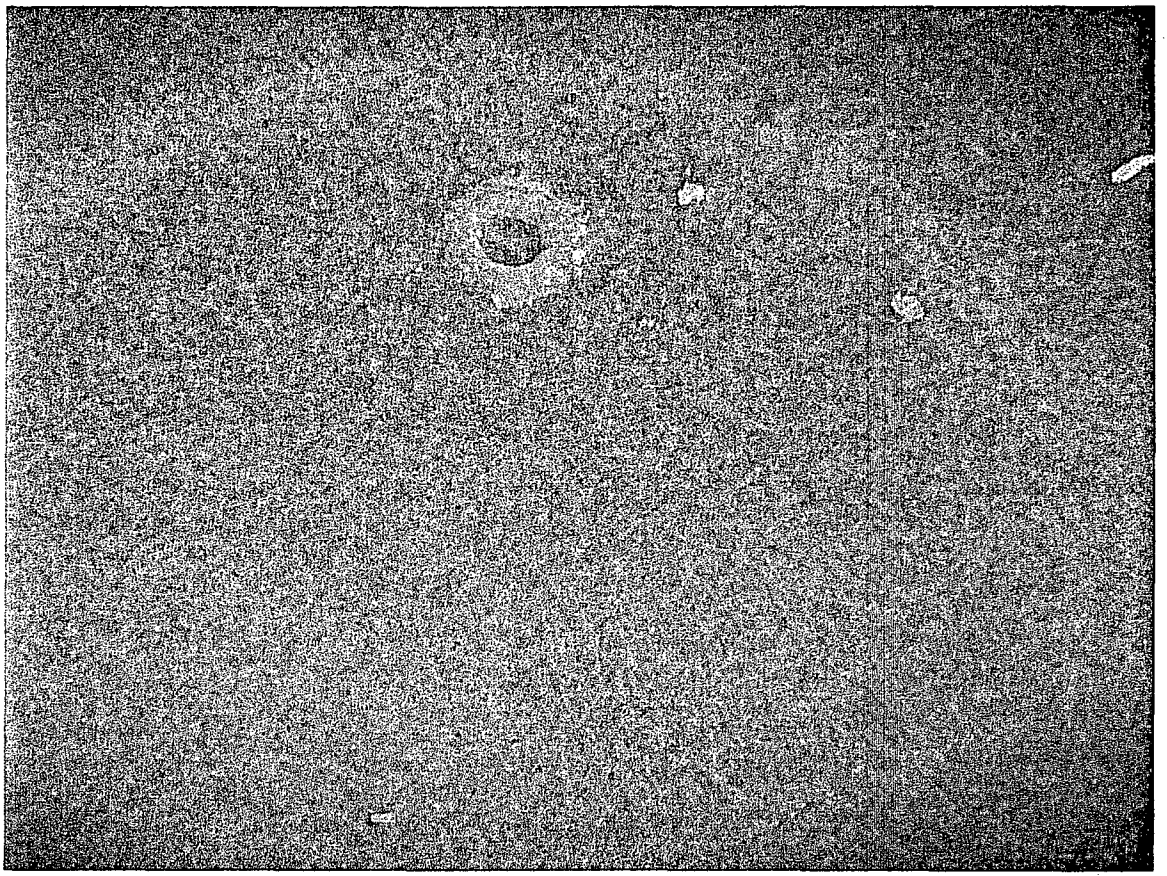


The access man way to the tank.

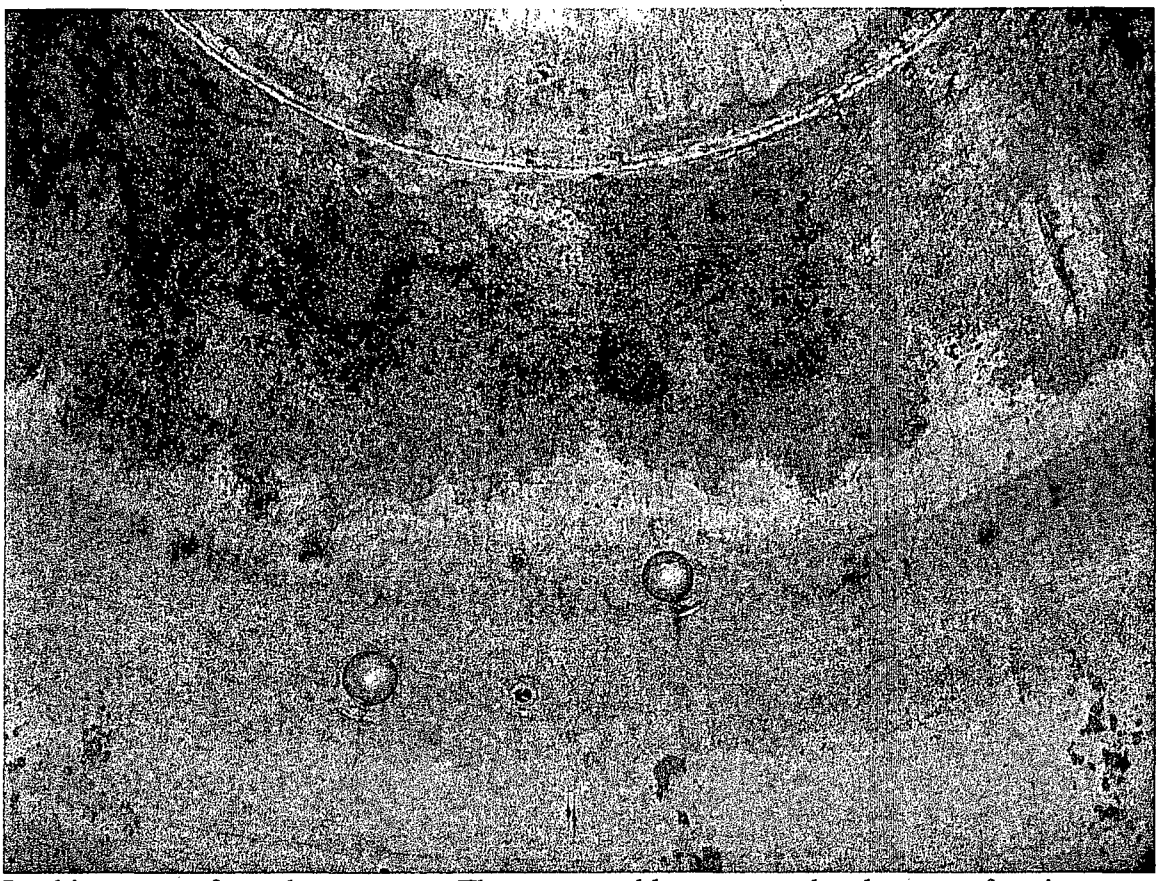


The interior of the tank looking up from the manway. The penetrations are for the nitrogen feed line (bottom of the picture), and the tank pressure relief valve (center of the picture.

Looking up and right of the man way is the worst area of interior liner degradation in the tank. Notice the slight bubbling in the coating. (upper center of the picture)



The bottom of the tank and the tank feed/drain line.



Looking across from the man way. The upper and lower water level sensors for nitrogen control. The other penetration visible is the lower vent line.

Inspection performed by: Gordon Dalby

Signature: _____ Date: _____