



Luminant

Rafael Flores
Senior 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

CP-201201384
Log # TXX-12162

Ref. # 10CFR50.55a

November 14, 2012

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NO. 50-445
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR
RELIEF REQUEST NO. E-1 (TAC NOS. ME9261 AND ME9262)

- REFERENCES:**
1. Letter logged TXX-12118 dated August 16, 2012 from Rafael Flores to the NRC submitting Relief Request No. E-1 for Containment Electrical Penetrations (Second IWE Interval End Date: September 9, 2011).
 2. Email dated October 22, 2012 from Balwant Singal of the NRC to Timothy Hope of Luminant Power requesting additional information regarding Relief Request No. E-1 (TAC Nos. ME9261 and ME9262).

Dear Sir or Madam:

Per reference 1, Luminant Generation Company LLC (Luminant Power) previously submitted a request for relief for containment electrical penetrations. Per reference 2, the NRC provided a request for additional information regarding the subject relief request.

Luminant Power has provided the information requested per reference 2 in the Attachments 1 and 2 to this letter.

This communication contains no new commitment regarding Comanche Peak Units 1 and 2.

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

A member of the STARS Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

A047
NRR

Sincerely,

Luminant Generation Company LLC

Rafael Flores

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

Attachment 1 Response to Request for Additional Information for Relief Request E-1

Attachment 2 Local Leak Rate (Type B) Results

c - E. E. Collins, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak
Jack Ballard, ANII, Comanche Peak

Luis Ponce
Texas Department of Licensing and Regulation
P. O. Box 12157
Austin, Texas 78711-2332

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
FOR RELIEF REQUEST NUMBER E-1 FOR THE UNITS 1 AND 2 SECOND 10 YEAR IWE INTERVAL
(SECOND INTERVAL END DATE: SEPTEMBER 9, 2011) (TAC NOS. ME9261 AND ME9262)**

The following questions were provided to Luminant Power in the email dated October 22, 2012, from Balwant Singal of the NRC to Timothy Hope of Luminant Power (reference 2) requesting additional information regarding Relief Request No. E-1:

NRC Question 1:

Section 4 of your application for RR E-1 stated that the surfaces of 20 electrical penetrations are covered with radiant energy shielding material. Section 6 of your application stated that the carbon steel containment liner, mechanical penetrations and the remaining stainless steel electrical penetrations (66 in CPNPP, Unit 1 and 64 in CPNPP, Unit 2) have all been examined each period during the second interval without any degradation or corrosion identified.

Please provide clarification that RR E-1 pertains to the visual examination of electrical penetration stainless steel assemblies and confirm that the containment liner in the local area of those electrical penetrations included in RR E-1 (total of 20 penetrations, 9 in CPNPP, Unit 1 and 11 in CPNPP, Unit 2) have been examined and no degradation or corrosion have been identified.

Luminant Power's Response to Question 1:

Relief Request E-1 pertains to the visual examination of 20 stainless steel electrical penetration assemblies covered with radiant energy shielding material that were not visually examined each period (3) during the second interval. The local areas of the containment liner around the 20 unexamined electrical penetrations were visually examined each period during the second interval, with no degradation or corrosion identified to the liner.

NRC Question 2:

Please provide the results of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix J containment integrated leak rate test (Type A) and their comparison with the allowable leakage rate specified in the plant Technical Specifications (TSs).

Luminant Power's Response to Question 2:

Reference T.S. 5.5.16.c & 5.5.16.d.1 & T.S. Bases 3.6.1:

Allowable leakage rate (L_a) of 0.1% of containment air weight per day.

The As-found Type A test surveillance acceptance criteria is leakage rate less than or equal to 1.0 L_a . In addition the As-left Type A test surveillance acceptance criteria is leakage rate less than or equal to 0.75 L_a prior to entering the mode in which containment operability is required (Mode 4).

Unit 1 Type A test results performed in April 2007:

- The As-found leakage rate was 0.063019% weight per day which met the As-found surveillance criteria of 0.1% weight per day.
- The As-left leakage rate was 0.0630% weight per day which met the As-left surveillance criteria of 0.075% weight per day.

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
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Unit 2 Type A test results performed in October 2012:

- The As-found leakage rate was 0.0595% weight per day which met the As-found surveillance criteria of 0.1% weight per day.
- The As-left leakage rate was 0.0594% weight per day which met the As-left surveillance criteria of 0.075% weight per day.

NRC Question 3:

Please provide the results of Type B leakage test of those electrical penetrations included in RR E-1 (total of 20 penetrations, 9 in CPNPP, Unit 1 and 11 in CPNPP, Unit 2) and discuss the acceptability of leakage test results and the performance history of Type B leakage testing of these electrical penetrations.

Luminant Power's Response to Question 3:

The electrical penetrations are tested in groupings by elevation. The electrical penetrations in question are part of the overall groupings categorized as follows:

Unit 1:

- 852-ELEC-PEN includes E-0006, E-0009, E-0016, & E-0018
- 832-ELEC-PEN includes E-0029, E-0039, & E-0040
- 810-ELEC-PEN includes E-0056 & E-0060

Unit 2:

- 2-852-ELEC-PEN includes 2-E-0006, 2-E-0009, 2-E-0015, 2-E-0016, & 2-E-0018
- 2-832-ELEC-PEN includes 2-E-0039, 2-E-0040, & 2-E-0045
- 2-810-ELEC-PEN includes 2-E-0056, 2-E-0060, & 2-E-0066

See Attachment 2 for the Local Leak Rate (Type B) Results for each grouping. There have been no previous failures for these penetrations for Unit 1 or Unit 2. The results listed in Attachment 2 are in standard cubic centimeters per minute (scm). The administrative limit for each test is 100 scm. However, the Unit 1 tests performed in 1991 had an administrative limit of 25 scm. The two tests that exceeded 25 scm had a technical evaluation performed which documented the acceptability of the test results via Technical Evaluation (TE) 91-2683.

ATTACHMENT 2 to TXX-12162

Local Leak Rate (Type B) Results

TU ELECTRIC
LOCAL LEAK RATE TEST
Past Performance History Report

Unit/ Pene. No : 852-ELEC-PEN
Procedure : OPT-860A/ RT 504952

System/Service : ELEC. PEN ASSY
Current Interval : 3660
Test Type : C
Pene. Status : Passed
Next Test Due : 10/29/2015

	Minimum Path	Maximum Path
As Found (AF)	91.30	91.30
As Left (AL)	91.30	91.30

Valve/Boundary : 852-ELEC-TC
Concurrently Tested Valve(s)/Boundary(s)
No Related Tag(s)

Inside / Outside : Outside
Admin. Limit : 100

	Test Date	Leak Rate	Work Order Number	As Left Entered?	Test Status
AS FOUND	10/21/2005	91.30	5-05-504952-AA		Passed
AS LEFT	10/21/2005	91.30	5-05-504952-AA	Yes	Passed
AS FOUND	10/01/2002	2.00	5-02-504952-AA		Passed
AS LEFT	10/01/2002	2.00	5-02-504952-AA	Yes	Passed
AS FOUND	03/04/1995	17.00	5-94-501651-AA		Passed
AS LEFT	03/04/1995	17.00	5-94-501651-AA	Yes	Passed
AS FOUND	04/14/1993	20.00	5-92-501651-AA		Passed
AS LEFT	04/14/1993	20.00	5-92-501651-AA	Yes	Passed
AS FOUND	09/12/1991	68.00	S-91-00008 -25		Passed
AF Comments: SEE TE 91-2683					
AS LEFT	09/12/1991	68.00	S-91-00008 -25	Yes	Passed

***END OF HISTORY REPORT FOR : 852-ELEC-PEN

TU ELECTRIC
LOCAL LEAK RATE TEST
Past Performance History Report

Unit/ Pene. No : 832-ELEC-PEN
Procedure : OPT-859A / RT 504951

System/Service : *ELEC. PEN*
Current Interval : 3660
Test Type : C
Pene. Status : *Passed*
Next Test Due : *10/29/2015*

	Minimum Path	Maximum Path
As Found (AF)	20.00	20.00
As Left (AL)	20.00	20.00

Valve/Boundary : 832-ELEC-TC
Concurrently Tested Valve(s)/Boundary(s)
No Related Tag(s)

Inside / Outside : Outside
Admin. Limit : 100

	Test Date	Leak Rate	Work Order Number	As Left Entered?	Test Status
AS FOUND	10/21/2005	20.00	5-05-504951-AA		Passed
AS LEFT	10/21/2005	20.00	5-05-504951-AA	Yes	Passed
AS FOUND	02/22/2005	58.50	5-99-504951-AA		Passed
AS LEFT	02/22/2005	58.50	5-99-504951-AA	Yes	Passed
AS FOUND	03/04/1995	20.00	5-94-501376-AA		Passed
AS LEFT	03/04/1995	20.00	5-94-501376-AA	Yes	Passed
AS FOUND	04/15/1993	20.00	5-92-501376-AA		Passed
AS LEFT	04/15/1993	20.00	5-92-501376-AA	Yes	Passed
AS FOUND	09/13/1991	3.50	S-91-00008 -24		Passed
AS LEFT	09/13/1991	3.50	S-91-00008 -24	Yes	Passed

***END OF HISTORY REPORT FOR : 832-ELEC-PEN

TU ELECTRIC
LOCAL LEAK RATE TEST
Past Performance History Report

Unit/ Pene. No : 810-ELEC-PEN
Procedure : OPT-858A / RT 504950

System/Service : **ELEC. PENS.**

Current Interval : 3660

Test Type : C

Pene. Status : Passed

Next Test Due : 10/29/2015

	Minimum Path	Maximum Path
As Found (AF)	31.00	31.00
As Left (AL)	31.00	31.00

Valve/Boundary : 810-ELEC-TC
Concurrently Tested Valve(s)/Boundary(s)
No Related Tag(s)

Inside / Outside : Outside
Admin. Limit : 100

	Test Date	Leak Rate	Work Order Number	As Left Entered?	Test Status
AS FOUND	10/21/2005	31.00	5-05-504950-AA		Passed
AS LEFT	10/21/2005	31.00	5-05-504950-AA	Yes	Passed
AS FOUND	03/01/2005	4.00	5-99-504950-AA		Passed
AS LEFT	03/01/2005	4.00	5-99-504950-AA	Yes	Passed
AS FOUND	03/04/1995	20.00	5-94-500217-AA		Passed
AS LEFT	03/04/1995	20.00	5-94-500217-AA	Yes	Passed
AS FOUND	04/15/1993	20.00	5-92-500217-AA		Passed
AS LEFT	04/15/1993	20.00	5-92-500217-AA	Yes	Passed
AS FOUND	09/12/1991	49.00	S-91-000082-3		Passed
AF Comments: SEE TE 91-2683					
AS LEFT	09/12/1991	49.00	S-91-000082-3	Yes	Passed

***END OF HISTORY REPORT FOR : 810-ELEC-PEN

TU ELECTRIC
LOCAL LEAK RATE TEST
Past Performance History Report

Unit/ Pene. No : 2-852-ELEC-PEN
Procedure : OPT-860B / RT 504708

System/Service : **ELEC PEN**
Current Interval : 1830
Test Type : C
Pene. Status : **Passed**
Next Test Due : **09/25/2017**

	Minimum Path	Maximum Path
As Found (AF)	71.00	71.00
As Left (AL)	71.00	71.00

Valve/Boundary : 2-852-ELEC-TC

Inside / Outside : Outside

Concurrently Tested Valve(s)/Boundary(s)

Admin. Limit : 100

No Related Tag(s)

	Test Date	Leak Rate	Work Order Number	As Left Entered?	Test Status
AS FOUND	09/21/2012	71.00	--444939-1		Passed
AS LEFT	09/21/2012	71.00	--444939-1	Yes	Passed
AS FOUND	07/30/2009	20.00	--350413-7		Passed
AS LEFT	07/30/2009	20.00	--350413-7	Yes	Passed
AS FOUND	04/21/2005	78.00	5-05-504708-AA		Passed
AS LEFT	04/21/2005	78.00	5-05-504708-AA	Yes	Passed
AS FOUND	04/02/2002	20.00	5-02-504708-AA		Passed
AS LEFT	04/02/2002	20.00	5-02-504708-AA	Yes	Passed
AS FOUND	01/02/2001	20.30	5-99-504708-AA		Passed
AS LEFT	01/02/2001	20.30	5-99-504708-AA	Yes	Passed
AS FOUND	02/25/1996	11.76	5-95-501368-AA		Passed
AS LEFT	02/25/1996	11.76	5-95-501368-AA	Yes	Passed
AS FOUND	10/09/1994	7.80	5-94-501368-AA		Passed
AS LEFT	10/09/1994	7.80	5-94-501368-AA	Yes	Passed

***END OF HISTORY REPORT FOR : 2-852-ELEC-PEN

TU ELECTRIC
LOCAL LEAK RATE TEST
Past Performance History Report

Unit/ Pene. No : 2-832-ELEC-PEN
Procedure : OPT-859B

System/Service : ELEC PEN
Current Interval : 1830
Test Type : C
Pene. Status : Passed
Next Test Due : 09/25/2017

	Minimum Path	Maximum Path
As Found (AF)	53.00	53.00
As Left (AL)	53.00	53.00

Valve/Boundary : 2-832-ELEC-TC
Concurrently Tested Valve(s)/Boundary(s)
No Related Tag(s)

Inside / Outside : Outside
Admin. Limit : 100

	Test Date	Leak Rate	Work Order Number	As Left Entered?	Test Status
AS FOUND	09/21/2012	53.00	--442849-1		Passed
AS LEFT	09/21/2012	53.00	--442849-1	Yes	Passed
AS FOUND	06/27/2009	96.00	--350324-2		Passed
AS LEFT	06/27/2009	96.00	--350324-2	Yes	Passed
AS FOUND	04/20/2005	84.00	5-03-504698-AA		Passed
AS LEFT	04/20/2005	84.00	5-03-504698-AA	Yes	Passed
AS FOUND	12/01/2000	50.00	5-99-504698-AA		Passed
AS LEFT	12/01/2000	50.00	5-99-504698-AA	Yes	Passed
AS FOUND	02/24/1996	19.40	5-95-502014-AA		Passed
AS LEFT	02/24/1996	19.40	5-95-502014-AA	Yes	Passed
AS FOUND	10/08/1994	14.00	5-94-502014-AA		Passed
AS LEFT	10/08/1994	14.00	5-94-502014-AA	Yes	Passed

***END OF HISTORY REPORT FOR : 2-832-ELEC-PEN

TU ELECTRIC
LOCAL LEAK RATE TEST
Past Performance History Report

Unit/ Pene. No : 2-810-ELEC-PEN
Procedure : OPT-858B/ RT 504697

System/Service : ELEC PEN
Current Interval : 1830
Test Type : C
Pene. Status : Passed
Next Test Due : 09/30/2017

	Minimum Path	Maximum Path
As Found (AF)	55.50	55.50
As Left (AL)	55.50	55.50

Valve/Boundary : 2-810-ELEC-TC
Concurrently Tested Valve(s)/Boundary(s)
No Related Tag(s)

Inside / Outside : Outside
Admin. Limit : 100

	Test Date	Leak Rate	Work Order Number	As Left Entered?	Test Status
AS FOUND	09/26/2012	55.50	--443028-4		Passed
AS LEFT	09/26/2012	55.50	--443028-4	Yes	Passed
AS FOUND	06/30/2009	74.50	--350321-4		Passed
AS LEFT	06/30/2009	74.50	--350321-4	Yes	Passed
AS FOUND	04/20/2005	77.40	5-03-504697-AA		Passed
AS LEFT	04/20/2005	77.40	5-03-504697-AA	Yes	Passed
AS FOUND	12/16/2000	85.00	5-99-504697-AA		Passed
AS LEFT	12/16/2000	85.00	5-99-504697-AA	Yes	Passed
AS FOUND	02/25/1996	15.62	5-95-500059-AA		Passed
AS LEFT	02/25/1996	15.62	5-95-500059-AA	Yes	Passed
AS FOUND	10/09/1994	23.40	5-94-500059-AA		Passed
AS LEFT	10/09/1994	23.40	5-94-500059-AA	Yes	Passed

***END OF HISTORY REPORT FOR : 2-810-ELEC-PEN