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William J. Cahill, Jr.
 Group Vice President

April 29, 1992

Mr. R. D. Martin, Regional Administrator
 U. S. Nuclear Regulatory Commission
 Region IV
 611 Ryan Plaza Drive, Suite 1000
 Arlington, Texas 76011



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NOS. 50-445 AND 50-446
 COMMENTS ON SYSTEMATIC ASSESSMENT OF LICENSEE
 PERFORMANCE (SALP)

Dear Mr. Martin:

By letter dated April 3, 1991, the Nuclear Regulatory Commission (NRC) transmitted the Systematic Assessment of Licensee Performance (SALP) Report for Comanche Peak Steam Electric Station (CPSES) to TU Electric. This report documented the staff's assessment of the performance of TU Electric with regard to CPSES during the period February 3, 1991, through February 1, 1992.

The staff concluded that TU Electric's performance was markedly improved, with numerous strengths and a few weaknesses in specific areas noted. Strong management oversight and involvement was a common thread through all functional areas. Well qualified staffs were found in all areas, and the performance level of system engineers and maintenance craftsmen was considered high. Prior areas of concern, such as initial operator licensing, plant labeling, secondary plant condition, self-identification of problem areas, and root cause analyses were addressed and either fully corrected or much improved.

Strong programs to control activities were evident in all functional areas, but some weaknesses in implementation at the working level were noted in the operations and surveillance areas and in the development of preoperational test procedures. Areas requiring additional management attention include the root cause determination and correction of operator performance errors, the elimination of missed and improperly performed surveillance tests, the upgraded preoperational test preparation and review process, the implementation of corrective actions and the level of detail in licensing submittals.

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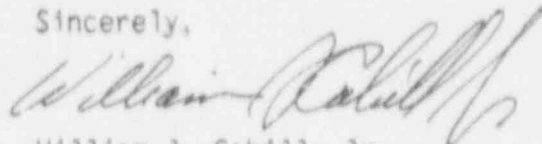
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TU Electric has carefully reviewed and evaluated the information contained in the SALP Report and, as stated at the meeting of April 21, 1992, finds it to be accurate and agrees with the overall conclusions and recommendations contained therein. TU Electric is initiating actions in response to the recommendations and to effect improvements in the areas of weaknesses identified by the NRC in the SALP Report. In the public meeting the NRC stated that for an operating plant, the functional areas of Operations and Maintenance/Surveillance are important. TU Electric concurs and is striving to improve performance in these two areas.

Sincerely,



William J. Cahill, Jr.

CBC/cbc

c - Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR