

**TEXAS UTILITIES GENERATING COMPANY**  
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TXX-4367

MICHAEL D. SPENCE  
PRESIDENT

November 21, 1984

Mr. Darrell G. Eisenhut  
Director, Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

*Original*

Dear Mr. Eisenhut:

On October 8, 1984, Texas Utilities Electric Company (TUEC) submitted our response to the NRC-Technical Review Team initial transmittal of potential open items. Our response consisted of two principal elements, the Comanche Peak Response Team (CPRT) Program Plan and issue-specific Action Plans.

Subsequent to our meetings of October 19 and 23, during which TUEC had the benefit of NRC Staff feedback and comments on our October 8 submittal, we have substantially revised our Program Plan. Enclosed with this letter is Revision 1 to the Program Plan.

The revisions focus on enhancing three aspects of the plan. First, we have added two members to the Senior Review Team (SRT) from outside TUEC. We have also replaced all the Issue Team Leaders with experts from outside TUEC. Our objective in filling these key, decision-making positions by experienced, nuclear industry experts is to eliminate any questions regarding the credibility and objectivity of the program by providing fresh perspective.

Second, the Program Plan has been revised to include more specificity regarding the determination of root causes and potential generic implications. The manner in which such determinations shall be incorporated in the scope and content of Issue-Specific Action Plans has been clarified.

Third, the Program Plan now contains guidance with respect to relevant information raised by or presented to the Comanche Peak Atomic Safety and Licensing Board in the scope and content of the specific Action Plans.

We are currently revising Appendix A of the Program Plan (i.e., the issue specific Action Plans) to address the NRC staff comments provided to us at the recent meetings. The Issue-Specific Action Plans will be resubmitted under separate cover after our newly-assigned Review Team Leaders have incorporated any appropriate revisions.

Sincerely,

*Michael D. Spence*  
Michael D. Spence

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