



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064**

March 4, 2002

Mr. C. L. Terry, Senior Vice President  
& Principal Nuclear Officer  
TXU Generation Management Company LCC,  
Managing General Partner for TXU Generation  
Company LP  
ATTN: Regulatory Affairs Department  
P.O. Box 1002  
Glen Rose, Texas 76043

**SUBJECT: ANNUAL ASSESSMENT - COMANCHE PEAK STEAM ELECTRIC STATION  
(REPORT 50-445, 446/02-01)**

Dear Mr. Terry:

On February 13, 2002, the NRC staff completed its end-of-cycle plant performance assessment of Comanche Peak Steam Electric Station. The end-of-cycle review for Comanche Peak Steam Electric Station involved the participation of all technical divisions in evaluating performance indicators for the most recent quarter and inspection results for the period from April 1 through December 31, 2001. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility. This will provide you an opportunity to prepare for these inspections and to inform us of any planned inspections which may conflict with your plant activities.

As discussed in our previous annual assessment letter, dated May 29, 2001, this inspection and assessment cycle consisted of three quarters (i.e., the second, third, and fourth quarters of Calendar Year 2001) instead of the usual four quarters. This change was implemented in order to align the inspection and assessment cycle with the calendar year beginning on January 1, 2002.

Overall, Comanche Peak Steam Electric Station operated in a manner that preserved public health and safety, and fully met all cornerstone objectives. Plant performance for the most recent quarter was within the Regulatory Response Column of the NRC's Action Matrix, based on one finding of low to moderate safety significance (White) in the Public Radiation Safety cornerstone.

Between January 24, 2000, and May 24, 2001, you identified 11 examples in which radioactive material was inadvertently released from the radiologically controlled area because of improperly conducted surveys. The significance of these events was determined to be of low-to-moderate risk based on the number of events (>5), and the public exposure associated with each event was less than 5 millirem. None of the material was released from the owner-controlled area; however, the individual examples revealed a potentially unmonitored pathway

for radioactive material to be released from the facility. A Notice of Violation associated with this issue was issued on February 21, 2002. In response to the low-to-moderate risk significant finding, NRC will conduct a Supplemental Inspection in accordance with NRC Manual Chapter 95001, "Inspection For One or Two White Inputs in a Strategic Performance Area," in addition to the baseline inspection program. This inspection has been scheduled for April 23-25, 2002. Also, both units will be inspected in accordance with Temporary Instruction 2515/145, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles (NRC Bulletin 2001-01)."

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued safeguards advisories recommending that nuclear power plant licensees go to the highest level of security, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants, including Comanche Peak Steam Electric Station, remain at a high level of security. On February 25, 2002, the NRC issued an Order to all nuclear power plant licensees, requiring them to take certain additional interim compensatory measures to address the generalized high-level threat environment. These additional compensatory requirements will provide the NRC with reasonable assurance that public health and safety and the common defense and security continue to be adequately protected in the current generalized high-level threat environment. These requirements will remain in effect pending notification from the Commission that a significant change in the threat environment occurs or until the Commission determines that other changes are needed following a more comprehensive re-evaluation of current safeguards and security programs. To date we have monitored TXU Generation Company LP's actions in response to the terrorist attacks through a series of audits. With the issuance of the Order, we will evaluate TXU Generation Company LP's compliance with these interim requirements.

The enclosed inspection plan details the inspections scheduled through March 31, 2003. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The last 6 months of the inspection plan are tentative and may be revised at the Midcycle Review meeting.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact William D. Johnson at (817) 860-8148 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

*/RA/*

Ken E. Brockman, Director  
Division of Reactor Projects

Dockets: 50-445, 50-446  
Licenses: NPF-87, NPF-89

Enclosure:  
Comanche Peak Steam Electric  
Station Inspection/Activity Plan

cc w/enclosure:  
Roger D. Walker  
Regulatory Affairs Manager  
TXU Generation Company LP  
P.O. Box 1002  
Glen Rose, Texas 76043

George L. Edgar, Esq.  
Morgan, Lewis & Bockius  
1800 M. Street, NW  
Washington, D.C. 20036

G. R. Bynog, Program Manager/  
Chief Inspector  
Texas Department of Licensing & Regulation  
Boiler Division  
P.O. Box 12157, Capitol Station  
Austin, Texas 78711

County Judge  
P.O. Box 851  
Glen Rose, Texas 76043

Chief, Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, Texas 78756-3189

John L. Howard, Director  
Environmental and Natural Resources Policy  
Office of the Governor  
P.O. Box 12428  
Austin, Texas 78711-3189

Roger Hill  
Sheriff, Somervell County  
1505 Northeast Big Bend Trail  
Glen Rose, Texas 76043

Connie Kirk  
Mayor of Glen Rose  
P.O. Box 87  
Glen Rose, Texas 76043

Linda Steen  
County Judge  
County Court Room 7  
Granbury, Texas 76048

David Southern  
Mayor of Granbury  
P.O. Box 969  
Granbury, Texas 76048

Federal Emergency Management Agency  
Ron Castleman, Regional Director  
Region VI, Federal Center  
800 North Loop 288  
Denton, Texas 76201-3698

Max Yzaquirre, Chairman  
Public Utility Commission  
William B. Travis Bldg.  
P.O. Box 13326  
1701 North Congress Avenue  
Austin, Texas 78701-3326

Roger Mulder  
State Energy Conservation Office  
111 E 17th Street, Room 1114  
Austin, Texas 78711

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  - DRP Director **(KEB)**
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  - S. Richards, NRR Project Director **(SAR)**
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**Comanche Peak**  
**Inspection / Activity Plan**  
**03/01/2002 - 03/30/2003**

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>PSB-RP4 - ALARA PLANNING AND CONTROLS</b>		1			
1, 2	IP 7112102	ALARA Planning and Controls		03/11/2002	03/15/2002	Baseline Inspections
	<b>EMB - ISI - UNIT 2</b>		1			
2	IP 7111108	Inservice Inspection Activities		04/08/2002	04/12/2002	Baseline Inspections
	<b>RP-1 - ACRSA AND PIV</b>		1			
1, 2	IP 7112101	Access Control to Radiologically Significant Areas		04/08/2002	04/12/2002	Baseline Inspections
1, 2	IP 71151	Performance Indicator Verification		04/08/2002	04/12/2002	Baseline Inspections
	<b>TI 145-2 - TI 2515/145 UNIT 2</b>		2			
2	IP 2515/145	Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles (NRC Bulletin :		04/08/2002	04/12/2002	Safety Issues
	<b>EMB - ISI/SG - UNIT 2</b>		1			
2	IP 7111108	Inservice Inspection Activities		04/22/2002	04/26/2002	Baseline Inspections
	<b>RP - SUPPLEMENTAL INSPECTION</b>		1			
1, 2	IP 95001	Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area		04/23/2002	04/25/2002	Supplemental Program
	<b>EMB - BIENNIAL MAINTENANCE RULE INSPECTION</b>		1			
1, 2	IP 7111112B	Maintenance Rule Implementation		06/10/2002	06/14/2002	Baseline Inspections
	<b>PSB-S1 - ACCESS AUTH/CONTROL, SEC PLAN, PIV</b>		1			
1, 2	IP 7113001	Access Authorization Program (Behavior Observation Only)		07/08/2002	07/12/2002	Baseline Inspections
1, 2	IP 7113002	Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorizator		07/08/2002	07/12/2002	Baseline Inspections
1, 2	IP 7113004	Security Plan Changes		07/08/2002	07/12/2002	Baseline Inspections
1, 2	IP 71151	Performance Indicator Verification		07/08/2002	07/12/2002	Baseline Inspections
	<b>RP-3 - ALARA</b>		1			
1, 2	IP 7112102	ALARA Planning and Controls		08/12/2002	08/16/2002	Baseline Inspections
	<b>EMB - ISI - UNIT 1</b>		1			
1	IP 7111108	Inservice Inspection Activities		10/07/2002	10/11/2002	Baseline Inspections
	<b>TI 145 - TI 2515/145 UNIT 1</b>		2			
1	IP 2515/145	Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles (NRC Bulletin :		10/07/2002	10/11/2002	Safety Issues
	<b>OB-IN - INITIAL EXAM PREP</b>		3			
1	X02227	COMANCHE PEAK-UNIT 1 INITIAL EXAM (11/02)		10/21/2002	10/25/2002	Not Applicable
2	X02228	COMANCHE PEAK-UNIT 2 INITIAL EXAM (11/02)		10/21/2002	10/25/2002	Not Applicable
	<b>EMB - ISI/SG - UNIT 1</b>		1			
1	IP 7111108	Inservice Inspection Activities		10/28/2002	11/01/2002	Baseline Inspections
	<b>EMB - SSD&amp;PC INSPECTION</b>		5			
1, 2	IP 7111121	Safety System Design and Performance Capability		11/18/2002	11/22/2002	Baseline Inspections
1, 2	IP 7111121	Safety System Design and Performance Capability		12/02/2002	12/06/2002	Baseline Inspections

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

**Comanche Peak  
Inspection / Activity Plan**

03/01/2002 - 03/30/2003

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>OB-IN - INITIAL EXAM</b>		<b>5</b>			
1	X02227	COMANCHE PEAK-UNIT 1 INITIAL EXAM (11/02)		11/11/2002	11/22/2002	Not Applicable
2	X02228	COMANCHE PEAK-UNIT 2 INITIAL EXAM (11/02)		11/11/2002	11/22/2002	Not Applicable
	<b>EMB - 50.59</b>		<b>1</b>			
1, 2	IP 7111102	Evaluation of Changes, Tests, or Experiments		12/09/2002	12/13/2002	Baseline Inspections
	<b>TM-RP-P - RP TEAM INSPECTION-PUBLIC</b>		<b>5</b>			
1, 2	IP 7112103	Radiation Monitoring Instrumentation		12/09/2002	12/13/2002	Baseline Inspections
1, 2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		12/09/2002	12/13/2002	Baseline Inspections
1, 2	IP 7112202	Radioactive Material Processing and Transportation		12/09/2002	12/13/2002	Baseline Inspections
1, 2	IP 7112203	Radiological Environmental Monitoring Program		12/09/2002	12/13/2002	Baseline Inspections
	<b>EMB - HEAT SINKS</b>		<b>1</b>			
1, 2	IP 7111107B	Heat Sink Performance		02/10/2003	02/14/2003	Baseline Inspections
	<b>OB-RQ - CPSES REQUAL INSPECTION</b>		<b>2</b>			
1, 2	IP 7111111B	Licensed Operator Requalification		03/02/2003	03/06/2003	Baseline Inspections
	<b>EMB - PERMANENT MODS</b>		<b>2</b>			
1, 2	IP 7111117B	Permanent Plant Modifications		03/10/2003	03/14/2003	Baseline Inspections

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