

December 2, 2002

Mr. C. Lance Terry
Senior Vice President &
Principal Nuclear Officer
TXU Energy
Attn: Regulatory Affairs Department
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 -
RESPONSE TO NRC BULLETIN 2002-02, "REACTOR PRESSURE VESSEL
HEAD AND VESSEL HEAD PENETRATION NOZZLE INSPECTION
PROGRAMS" (TAC NO. MB5883 AND MB5884)

Dear Mr. Terry:

On August 9, 2002, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs," (the Bulletin). The Bulletin requested addressees to provide information related to their reactor pressure vessel (RPV) head and vessel head penetration (VHP) nozzle inspection programs for their respective facilities, including a summary discussion of inspection program plans to supplement their required visual inspections with non-visual nondestructive examination methods, or justification for reliance on visual examinations as the primary method to detect degradation. Addressees were requested to respond to Item (1) of the Bulletin within 30 days of its issuance, or to provide an alternative course of action, including the basis for acceptability of the proposed action, within 15 days of its issuance.

By letter dated September 11, 2002, TXU Energy provided a response to Item (1) of the Bulletin, indicating the plans to perform RPV head and VHP nozzle inspections at Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The response also indicated that CPSES, Units 1 and 2, are in the category of plants considered to have low susceptibility to RPV head and VHP cracking, based on a susceptibility ranking of less than eight effective degradation years.

The NRC staff has reviewed your response to Item (1) of the Bulletin. For CPSES, Unit 2, the staff finds the 100% bare metal visual examination conducted during the sixth refueling outage in April 2002 provides reasonable assurance of adequate protection of public health and safety. Likewise, for CPSES, Unit 1, the staff finds the 100% bare metal visual examination conducted during the ninth refueling outage in October 2002 provides reasonable assurance of adequate protection of public health and safety.

The staff notes that your justification for reliance on visual examinations and long-term inspection plans refer to the Electric Power Research Institute's Materials Reliability Program (MRP) inspection plan for pressurized water reactor RPV upper head penetrations. The staff

has not completed its review of the MRP inspection plan and, as such, has not made a determination on the adequacy of the program for ensuring applicable regulatory requirements are met. Also, the staff notes that you indicated you will provide your future inspection plans by August 9, 2006. You are requested to provide your future inspection plans no later than 90 days prior to the start of the refueling outage following the October 2002 outage for CPSES, Unit 1, and 90 days prior to the start of the refueling outage following the April 2002 outage for CPSES, Unit 2. The staff's assessment of your justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

Item (2) of the Bulletin requested that you report to the Commission your inspection scope and results within 30 days after plant restart following the inspections of the RPV head and VHP nozzles. The staff finds your June 3, 2002, report submitted for CPSES, Unit 2 in response to Item 2.A of Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity," satisfies the report requested in Item (2) of Bulletin 2002-02. Please note that you are to report to the Commission in accordance with Item (2) of the Bulletin for CPSES, Unit 1.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-445 and 50-446

cc: See next page

has not completed its review of the MRP inspection plan and, as such, has not made a determination on the adequacy of the program for ensuring applicable regulatory requirements are met. Also, the staff notes that you indicated you will provide your future inspection plans by August 9, 2006. You are requested to provide your future inspection plans no later than 90 days prior to the start of the refueling outage following the October 2002 outage for CPSES, Unit 1, and 90 days prior to the start of the refueling outage following the April 2002 outage for CPSES, Unit 2. The staff's assessment of your justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

Item (2) of the Bulletin requested that you report to the Commission your inspection scope and results within 30 days after plant restart following the inspections of the RPV head and VHP nozzles. The staff finds your June 3, 2002, report submitted for CPSES, Unit 2 in response to Item 2.A of Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity," satisfies the report requested in Item (2) of Bulletin 2002-02. Please note that you are to report to the Commission in accordance with Item (2) of the Bulletin for CPSES, Unit 1.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager, Section 1
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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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