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

January 18, 2002

Mr. C. L. Terry
Senior Vice President & Principal Nuclear Officer of
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: COMANCHE PEAK STEAM ELECTRIC STATION - NRC INSPECTION REPORT 50-445/01-05; 50-446/01-05

Dear Mr. Terry:

On December 29, 2001, the NRC completed an inspection at your Comanche Peak Steam Electric Station, Units 1 and 2, facility. The enclosed report documents the inspection findings which were discussed on January 3, 2002, with you and members of your staff.

This inspection examined activities conducted under your licenses as they related to safety and compliance with the Commission's rules and regulations and with the conditions of your licenses. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection no finding of significance was identified.

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued an advisory 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 remain at the highest level of security and the NRC continues to monitor the situation. This advisory was followed by additional advisories, and although the specific actions are not releasable to the public, they generally include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with law enforcement and military authorities, and more limited access of personnel and vehicles to the sites. The NRC has conducted various audits of the licensees' response to these advisories and their ability to respond to terrorist attacks with the capabilities of the current design basis threat (DBT). From these audits, the NRC has concluded that the licensees' security programs are adequate at this time.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response 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).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

David Graves, Chief
Project Branch A
Division of Reactor Projects

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

Enclosure:
NRC Inspection Report
50-445/01-05; 50-446/01-05

cc w/enclosure:
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket Nos:	50-445 50-446
License Nos:	NPF-87 NPF-89
Report No:	50-445/01-05 50-446/01-05
Licensee:	TXU Electric
Facility:	Comanche Peak Steam Electric Station, Units 1 and 2
Location:	FM-56 Glen Rose, Texas
Dates:	October 7 through December 29, 2001
Inspectors:	D. B. Allen, Senior Resident Inspector S. C. Schwind, Resident Inspector B. D. Baca, Health Physicist, Plant Support Branch P. J. Elkman, Emergency Preparedness Inspector, Plant Support Branch W. M. McNeill, Reactor Inspector, Engineering and Maintenance Branch
Approved by:	D. N. Graves, Chief Project Branch A Division of Reactor Projects
Attachment:	Supplemental Information

SUMMARY OF FINDINGS

Comanche Peak Steam Electric Station, Units 1 and 2
NRC Inspection Report 50-445/01-05; 50-446/01-05

IR 05000445-01-05; IR 05000446-01-05; on 10/07/2001-12/29/2001; TXU Electric; Comanche Peak Steam Electric Station; Units 1 and 2. Integrated Resident & Regional Report.

The inspection was conducted by resident inspectors and regional office inspectors. The inspection identified no findings of significance. The significance of issues is indicated by their color (green, white, yellow, or red) and was determined by the Significance Determination Process in Inspection Manual Chapter 0609. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at http://www.nrc.gov/NRR/OVERSIGHT/index.html.

No findings of significance were identified.

Report Details

Summary of Plant Status

Both units operated at essentially 100 percent power for the duration of the report period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness

1R01 Adverse Weather Protection (71111.01)

a. Inspection Scope

The inspectors reviewed the Station Administrative Procedure STA 634, “Extreme Temperature Equipment Protection Program,” Revision 3, and Abnormal Conditions Procedure ABN 912, “Cold Weather Preparations/Heat Tracing and Freeze Protection System Malfunction,” Revision 5, to determine if these procedures were adequate to assure that safety-related equipment would remain operable during freezing weather. In addition, on November 26, 2001, partial walkdowns were performed in the Unit 1 and Unit 2 diesel generator rooms and in the vicinity of the Unit 1 and Unit 2 refueling water storage tanks to verify the freeze protection measures in ABN 912 had been implemented prior to the onset of freezing conditions.

b. Findings

No findings of significance were identified.

1R02 Evaluations of Changes, Tests, or Experiments (71111.02)

a. Inspection Scope

The team reviewed a selected sample of 10 safety evaluations, listed in the attachment to this report, to verify that the licensee had appropriately considered the conditions under which the licensee may make changes to the facility or procedures or conduct tests or experiments without prior NRC approval.

The team reviewed a selected sample of 11 safety evaluation screenings, listed in the attachment to this report, in which the licensee determined that safety evaluations were not required, to ensure that the licensee’s exclusion of a full evaluation was consistent with the requirements of 10 CFR 50.59, “Evaluations of Changes, Tests, or Experiments.” The team also reviewed a selected sample of 7 safety evaluation applicability determinations, listed in the attachment to this report, in which the licensee determined that safety evaluation screenings were not required, to ensure that the licensee’s exclusion of a full evaluation was consistent with the requirements of 10 CFR 50.59, “Evaluations of Changes, Tests, or Experiments.”

The team reviewed 7 Smart Forms, the licensee's corrective action document, listed in

the attachment to this report, initiated by the licensee that addressed problems or deficiencies associated with 10 CFR 50.59 requirements to ensure that appropriate corrective actions were being taken. The team also reviewed licensee self-assessments to ensure that problems or deficiencies were appropriately addressed.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment (71111.04)

.1 Partial System Walkdown

a. Inspection Scope

The inspectors conducted partial walkdowns of the following risk-significant systems to verify that they were in their proper standby alignment as defined by system operating procedures and system drawings. During the walkdowns, inspectors examined component material condition. In addition, the inspectors evaluated the effectiveness of the licensee's problem identification and resolution program in resolving issues which could increase event initiation frequency or impact mitigation system availability.

- Unit 2 Train A motor driven auxiliary feedwater system on October 18, 2001
- XST1 feeds to the Unit 1 and Unit 2 Class 1E switchgear on November 20, 2001

b. Findings

No findings of significance were identified.

.2 Detailed Semi-Annual Walkdown

a. Inspection Scope

The inspectors conducted a detailed semi-annual inspection of the control room heating, ventilation, air conditioning, and filtration system to ascertain if the system and its operating procedures were in accordance with the design and licensing bases of the system. The inspection included several system walkdowns in November comparing equipment alignment to operating procedures and drawings. Outstanding maintenance work requests and design issues were reviewed to determine if any impacted the system's ability to operate as designed.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Routine Fire Area Walkdowns

a. Inspection Scope

The inspectors toured the following areas to assess the licensee's control of transient combustible materials, the material condition and lineup of fire detection and suppression systems, and the material condition of manual fire equipment and passive fire barriers. The licensee's fire preplans and Fire Hazards Analysis Report were used to identify important plant equipment, fire loading, detection and suppression equipment locations, and planned actions to respond to a fire in each of the plant areas selected. Compensatory measures for degraded equipment were evaluated for effectiveness.

- Fire Zone 2SD009 - Unit 2 Train A switchgear room
- Fire Zone 1SE018 - Unit 1 Train B switchgear room
- Fire Zone 1SB008 - Unit 1 Safeguards Building 810' corridor
- Fire Zone 2SB008 - Unit 2 Safeguards Building 810' corridor
- Fire Zone AA021 - Units 1 & 2 Auxiliary Building 790' elevation
- Fire Zone ER150 - Units 1 & 2 Train A uninterruptible power supply heating and ventilation room
- Fire Zone EQ149 - Units 1 & 2 Train B uninterruptible power supply heating and ventilation room

b Findings

No findings of significance were identified.

.2 Annual Fire Drill

a. Inspection Scope

The inspectors observed the plant fire brigade during a fire drill on September 28, 2001, to assess its ability to fight fires. The fire was simulated to be in the area of the Unit 1 turbine lubricating oil storage room. Observations focused on the following aspects of the drill:

- Protective clothing/turnout gear was properly donned.
- Self-contained breather apparatus (SCBA) equipment was properly worn and used.

- Fire hose lines were capable of reaching all necessary fire hazard locations, that the lines were laid out without flow constrictions, the hose was simulated being charged with water, and the nozzle was pattern-tested (flow stream) prior to entering the fire area of concern.

- The fire area of concern was entered in a controlled manner (e.g., fire brigade members stayed low to the floor and felt the door for heat prior to entry into the fire area of concern).

- Sufficient fire fighting equipment was brought to the scene by the fire brigade to properly perform their firefighting duties.

- The fire brigade leader's fire fighting directions were thorough, clear, and effective.

- Radio communications with the plant operators and between fire brigade members were efficient and effective.

- Members of the fire brigade checked for fire victims and for fire propagation into other plant areas.

- Effective smoke removal operations were simulated.

- The fire fighting preplan strategies were utilized.

- The licensee preplanned drill scenario was followed, and that the drill objectives' acceptance criteria were met.

b. Findings

No findings of significance were identified.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

The inspectors conducted an inspection of flood protection measures at Comanche Peak. This included a review of flood analysis documentation and calculations to determine areas in the plant susceptible to flooding from internal sources. Based on that review and a review of the probabilistic risk assessment, a walkdown of the Unit 1 and Unit 2 turbine buildings, 778' elevation, was performed on October 7, 2001, to assess the adequacy of flood protection measures regarding the postulated failure of a main condenser circulating water expansion joint. The walkdown included determining whether mitigating systems defined in the flood analysis were in place and functional.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalifications (71111.11)

a. Inspection Scope

The inspectors observed operator performance during a scenario in the control room simulator on November 14, 2001, and attended the posttraining critique. The scenario included a loss of power to a reactor coolant pump with an anticipated transient without scram followed by a steam generator tube rupture. Simulator observations concentrated on the conduct of operations, procedure usage, and command and control.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors independently verified that the licensee properly implemented 10 CFR 50.65, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for the following equipment performance problems.

- Performance monitoring of condenser pit level monitoring Switches ½-LS-2820-A/B/C (Smart Form SMF-2001-2506)

- Unit 2 power operated relief Valve 2-PCV-0455A seat leakage (Smart Form SMF-2001-1870)

- Unit 2 steam generator blowdown isolation Valve 2-HV-2399 failed to close due to a ruptured diaphragm in the air operator (Smart Form SMF-2001-1881)

The inspectors reviewed whether the structures, systems, or components (SSCs) were properly characterized in the scope of the Maintenance Rule Program and whether the SSC failure or performance problem was properly characterized. The inspectors assessed the appropriateness of the performance criteria established for the SSC (if applicable).

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors independently verified that the licensee performed risk assessments

related to the following planned and emergent maintenance activities as required by 10 CFR 50.65 (a) (4), "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

- Placing the Unit 1 positive displacement charging pump inservice to support packing work on 1-FCV-121
- 345Kv switchyard metering modification concurrent with turbine driven auxiliary feedwater pump and diesel generator surveillance testing
- Compensatory actions taken for an extended maintenance outage on Transformer XST2
- Fiber optic cable installation in the vicinity of Transformer XST1 feed to Unit 2 while Transformer XST2 was out of service
- 345 Kv switchyard metering modification concurrent with maintenance on the Unit 2 turbine driven auxiliary feedwater pump and Train B service water pump
- Maintenance tagout intended for Unit 1 Train B containment spray pumps inadvertently hung on Unit 2 Train B containment spray pumps
- Emergent work to troubleshoot and correct oscillations in the Unit 1 feedwater regulating Valve 1-FCV-530
- Surveillance testing of Unit 1 Train A motor driven auxiliary feedwater pump concurrent with circulating water Pump 1-03 out of service

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed selected operability evaluations conducted by the licensee involving risk-significant systems or components. The inspectors evaluated the technical adequacy of the licensee's operability determination, determined whether appropriate compensatory measures were implemented, and determined whether the licensee considered all other pre-existing conditions, as applicable. Additionally, the inspectors evaluated the adequacy of the licensee's problem identification and resolution program as it applied to operability evaluations. Specific operability evaluations reviewed are listed below.

- Quick Technical Evaluation 2001-002114-01 regarding the operability of diesel generator auxiliary equipment which was supplied by electrical cables not protected from overloads in accordance with DBD-EE-051.

- Quick Technical Evaluation 2001-001723-01 regarding the operability of main steam line pressure Transmitter 1-PT-2325 following calibration with a test gauge which subsequently failed its calibration.

- Quick Technical Evaluation 2001-002599-01 regarding operability of the Unit 2 Train B service water Pump 2-02 after reverse rotation was observed during a surveillance test.

- Quick Technical Evaluation 2001-002099-01 regarding inadequate component sizing in a 480 volt motor control center.

- Quick Technical Evaluation 2001-002388-01 regarding operability of flow control Valves 1/2-FCV-610 and 1/2-FCV-611 without a body-to-bonnet seal weld as described in the Final Safety Analysis Report.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspector witnessed or reviewed the results of postmaintenance testing for the following maintenance activities:

- Replacement of valve packing on flow control Valve 1-FCV-121

- Installation of tripper stops in the motor operator for Valve 1-FV-4773

- Replacement of elastomers and subcomponents on Unit 2 Steam Generator 3 atmospheric relief Valve 2-PV-2327

In each case, the associated work orders and test procedures were reviewed against the attributes in Inspection Procedure 71111, Attachment 19, to determine the scope of the maintenance activity and determine if the testing was adequate to verify equipment operability.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors evaluated the adequacy of periodic testing of following important nuclear plant equipment including aspects such as preconditioning; the impact of testing during

plant operations; the adequacy of acceptance criteria including test frequency and test equipment accuracy, range and calibration; procedure adherence; record keeping; the restoration of standby equipment; test failure evaluations; jumper control (if applicable); and the effectiveness of the licensee's problem identification and correction program. The following surveillance test activities were observed by the inspectors:

- Unit 1, Train B containment spray pump quarterly surveillance on October 9, 2001

- Unit 1, Train A auxiliary feedwater pump surveillance on December 13, 2001

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)

The licensee did not submit emergency action level or emergency plan changes during the inspection period of April 1, 2001, through December 31, 2001; therefore, inspection procedure 71114.04 was not performed during the inspection period for this licensee.

1EP6 Drill Evaluation (71114.06)

a. Inspection Scope

The inspectors observed the emergency exercise conducted on November 13, 2001, with the Red team. Observations were conducted in the simulator control room and the emergency operations facility and included the opportunities for emergency classification, offsite notification, and protective action recommendations during the scenario. This evaluation included reviewing the scenario and drill objectives, observing licensee performance in the emergency facilities, observing the licensee's critique, and discussing observations and the licensee's findings with the emergency preparedness manager.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS3 Radiation Monitoring Instrumentation (71121.03)

a. Inspection Scope

To determine the accuracy and operability of radiation monitoring instruments used for the protection of occupational workers and the adequacy of the program to provide

self-contained breathing apparatus to personnel, the inspector interviewed cognizant licensee personnel and compared the following items with regulatory requirements:

- Calibration, operability, and alarm setpoints, when applicable, of selected portable radiation detection instrumentation, continuous air monitors, electronic alarming dosimeters, whole-body counting instrumentation (Acuscan and Fastscan), and personnel contamination monitors

- Calibration, operability, and alarm setpoints, when applicable, of selected installed radiation detection instrumentation such as containment high range area monitor (1-RE-6256), containment seal table room area radiation monitor (1-RE-6285), control room north intake gas monitors (X-RE-5895 A and B), main steam line radiation monitor (2-RE-2325), condenser off-gas monitor (2-RE-2959), residual heat removal area radiation monitor (1-RE-6260A), and containment particulate-iodine-gas monitor (1-REK-5502/03/66)

- Calibration expiration and source response test currency on radiation detection instruments staged for use

- Corrective actions taken for instruments found significantly out of calibration since the last successful source check or calibration

- The status of self-contained breathing apparatuses staged and ready for use in the plant and associated surveillance records

- The licensee's capability for refilling and transporting self-contained breathing apparatus air bottles to and from staged plant locations during emergency conditions

- Training and qualifications of control room operators and emergency response personnel for use of self-contained breathing apparatus

- Radiological incidents that involved personnel contamination monitor alarms due to personnel internal exposures

- Two Nuclear Overview Department Evaluation Reports (EVAL-2000-044 and EVAL-2001-039)

- Nuclear Procurement Issue Committee audit (Audit Number 01-02-DL) of analytics quality assurance program for the control of activities as they relate to the supply of radionuclide standards and sources

- Instrument calibration method and selection of calibration sources

- Health physics and safety services procedures implementing the radiation instrumentation program and respiratory protection program

- Selected corrective action documents written between March 1, 2001, and

November 1, 2001 (SMF-2001-000509, SMF-2001-001026, SMF-2001-001177, SMF-2001-001395, SMF-2001-001402, SMF-2001-001478, SMF-2001-001589, SMF-2001-001634, SMF-2001-001748, SMF-2001-001780, SMF-2001-001781, SMF-2001-001807, SMF-2001-002001, SMF-2001-002118, SMF-2001-002132, SMF-2001-002155, SMF-2001-002178, SMF-2001-002185, SMF-2001-002269, SMF-2001-002336, SMF-2001-002456)

In addition, the inspector observed an instrument operability check, an in-field source check, a calibration of a personnel contamination monitor (PM-7), and a calibration of a cabinet contamination monitor (SAM-9) and compared the activities to applicable regulatory requirements.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspector reviewed a sample of performance indicator data submitted by the licensee regarding the barrier integrity cornerstone to determine its accuracy and completeness. The sample included data on reactor coolant system specific activity taken in July, August, and September, 2001, for both units, and reactor coolant system leakage taken in May, June, July, August and September, 2001, for both units.

b. Findings

No findings of significance were identified.

4OA6 Meetings, including Exit

Exit Meeting Summary

On January 3, 2002, the inspectors presented the resident inspection results to Mr. Lance Terry, Senior Vice President, and other members of licensee management. The licensee acknowledged the findings presented.

The results of the radiation monitoring instrumentation inspection were presented to Mr. D. Moore, Plant Manager, and other members of licensee management at the conclusion of the inspection on November 16, 2001. The licensee acknowledged the findings presented.

The results of the inspection of evaluations of changes, tests, or experiments were presented to Mr. M. Blevins, Deputy to Senior Vice President, and other members of licensee management at the conclusion of the inspection on December 7, 2001. The

licensee acknowledged the findings presented.

In each case, the inspectors also asked the licensee if any materials reviewed during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT

Supplemental Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee

M. Blevins, Deputy to Senior Vice President & Principal Nuclear Officer
D. Bozeman, Manager, Emergency Planning
S. Bradley, Supervisor, Health Physics
J. Curtis, Manager, Radiation Protection
B. Hise, Supervisor, Safety Services
D. Moore, Plant Manager
D. O'Connor, Supervisor, Radiation Protection
D. Wilder, Manager, Radiation and Industrial Safety
C. Wilkerson, Senior Licensing Engineer

NRC

D. Allen, Senior Resident Inspector
S. Schwind, Resident Inspector

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed During this Inspection

None

Previous Items Closed

None

Previous Items Discussed

None

DOCUMENTS REVIEWED

Applicability Determinations

LDCR-2000-0033
LDCR-2001-0001
LDCR-2001-0023
LDCR-2001-0029
LDCR-2001-0035
LDCR-2001-0038
LDCR-2001-0046

Evaluations

59EV-1999-002168-01-00
59EV-2001-000426-01-00
59EV-2001-001870-01-00
SE 97-000042
SE 99-000039
SE 00-000025
SE 00-000031
SE 01-000009
SE 01-000012
SE 01-000013

Screenings

59SC-1999-000121-01-00
59SC-1999-000241-01-00
59SC-1999-001397-01-01
59SC-2000-000369-01-00
59SC-2000-000409-04-00
59SC-2000-000409-05-00
59SC-2000-001727-02-00
59SC-2000-001757-01-00
59SC-2000-002383-01-01
59SC-2001-000751-01-00
59SC-2001-001739-01-00

Self-Assessment

SA-2001-021, Operations Department Self-Assessment of the Revised 50.59 Process

Smart Forms

SMF-2001-002822-00
SMF-2001-002754-00
SMF-2001-002753-00
SMF-2001-002752-00
SMF-2001-002718-00
SMF-2001-002711-00
SMF-2001-001867-00

Miscellaneous

Comanche Peak Electric Station Final Safety Analysis Report, Amendment 97