

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

March 20, 2001

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNIT 1-
REFUELING OUTAGE NO. 8: STEAM GENERATOR TUBE INSPECTION

Dear Mr. Terry:

Steam generator (SG) tube eddy current (EC) inspections play a vital role in the management of SG tube degradation. The results are used to demonstrate adequate structural and leakage integrity of the SG tubes. The U.S. Nuclear Regulatory Commission (NRC) staff is interested in discussing TXU Electric's (the licensee's) SG inspection plans and results for the eighth refueling outage of CPSES Unit 1. The licensee is not required to participate in this discussion.

In addition to the traditional areas of discussion listed below, the NRC staff is also interested in having the licensee discuss and describe any actions taken in response to the Indian Point Nuclear Generating, Unit 2 (IP2) lessons learned.

Typical areas of discussion include:

- (1) Primary to secondary leakage prior to shutdown
- (2) Results of secondary side hydrostatic testing
- (3) For each SG, a general description of areas examined; include expansion criteria and specify type of probe used in each area
- (4) For analyzed EC results, describe bobbin indications (those not examined with rotating pancake coil (RPC)) and RPC/Plus Point/Cecco indications. Include the following information: location, number, degradation mode, disposition, and voltages/depths/lengths of the most significant indications
- (5) Description of repair/plugging plans
- (6) Discussion of previous history; "look backs" performed; consideration of similar plants' experiences
- (7) Discussion of new inspection findings, including loose parts indications
- (8) Description of in-situ pressure test plans and results; include tube selection criteria, test pressure plans, test configuration

- (9) Describe tube pull plans and preliminary results; include tube selection criteria and evaluation plans
- (10) Assessment of tube integrity for the previous operating cycle
- (11) Assessment of tube integrity for the next operating cycle
- (12) Provide schedule for SG-related activities during remainder of the current outage
- (13) Discuss what steps have been taken, or will be taken, in response to the lessons learned from the IP2 tube failure. In addition, please be prepared to discuss the following:
 - a) the actions that are taken in response to identifying a new degradation mechanism
 - b) the actions taken to ensure that data noise levels are acceptable
 - c) data quality issues and the need for criteria to address data quality

The NRC recognizes that refueling outages provide a considerable challenge to the licensee's manpower resources. Toward this end, the NRC staff pledges to conduct this effort in a manner which minimizes manpower expenditures. In this regard, it may facilitate the discussion if the licensee provides details on the topics listed above prior to the conference call (e.g., simple tables and figures). I will be contacting members of your staff, in the near future, to solicit their cooperation in this effort and, if agreeable, schedule a mutually convenient time for this conference call.

Sincerely,

/RA/

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

Docket No. 50-445

cc: See next page

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Comanche Peak Steam Electric Station

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