

October 29, 2001

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2 -
CORRECTION TO APPROVAL OF RELIEF REQUEST FOR APPLICATION OF
RISK-INFORMED INSERVICE INSPECTION (RI-ISI) PROGRAM FOR
AMERICAN SOCIETY OF MECHANICAL ENGINEERS BOILER AND
PRESSURE VESSEL CODE (ASME CODE) CLASS 1 AND 2 PIPING (TAC
NOS. MB1201 and MB1202)

Dear Mr. Terry:

By letter dated February 15, 2001, you requested approval of an alternative RI-ISI program for ASME Code Class 1 and 2 piping welds for CPSES, Units 1 and 2. By letter dated September 28, 2001, your request for relief was authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the alternative provides an acceptable level of quality and safety. The relief was authorized for the second 10-year ISI interval for CPSES Unit 1 and the first 10-year ISI interval for CPSES Unit 2.

In the Safety Evaluation (SE) enclosed with the letter of September 28, 2001, we inadvertently listed an incorrect reference number on page 9. At the end of the first paragraph in Section 4.0, CONCLUSIONS, of the SE, we stated that "...the licensee's proposed alternative is to use the risk-informed process described in the NRC-approved Reference 7." Reference 3, which is the NRC-approved document, should have been stated instead of Reference 7, which is not an NRC-approved document. Enclosed is a corrected page 9 of the SE.

Sincerely,

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure: Page 9 of SE

cc w/encl: See next page

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Comanche Peak Steam Electric Station

cc:

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The proposed periodic reporting requirements meet existing ASME Code requirements and applicable regulations and, therefore, are acceptable. The staff finds that the proposed process for RI-ISI program updates meets the guidelines of Reference 4 which provide that risk-informed applications should include performance monitoring and feedback provisions; therefore, the licensee's proposed process for program updates is acceptable.

4.0 CONCLUSIONS

In accordance with 10 CFR 50.55a(a)(3)(i), proposed alternatives to regulatory requirements may be used when authorized by the NRC when the applicant demonstrates that the alternative provides an acceptable level of quality and safety. In this case, the licensee's proposed alternative is to use the risk-informed process described in the NRC-approved Reference 3.

The staff finds that the results of the different elements of the engineering analysis are considered in an integrated decisionmaking process. The impact of the proposed change in the ISI program is founded on the adequacy of the engineering analysis and acceptable change in plant risk in accordance with the guidelines in References 4 and 5.

The CPSES methodology also considers implementation and performance monitoring strategies. Inspection strategies ensure that failure mechanisms of concern have been addressed and there is adequate assurance of detecting damage before structural integrity is affected. The risk significance of piping segments is taken into account in defining the inspection scope for the RI-ISI program.

System pressure tests and visual examination of piping structural elements will continue to be performed on all Class 1, 2, and 3 systems in accordance with the ASME Code, Section XI program. The RI-ISI program applies the same performance measurement strategies as existing ASME Code requirements and, in addition, increases the inspection volumes at weld locations that are exposed to thermal fatigue.

The CPSES methodology provides for conducting an engineering analysis of the proposed changes using a combination of engineering analysis with supporting insights from a PRA. Defense-in-depth and quality are not degraded in that the methodology provides reasonable confidence that any reduction in existing inspections will not lead to degraded piping performance when compared to existing performance levels. Inspections are focused on locations with active degradation mechanisms, as well as selected locations that monitor the performance of system piping. As discussed in Section 3.2 above, the licensee will address any staff concern, if applicable, as a result of a separate, ongoing review on the generic report MRP-24 regarding alternative TASCs screening criteria.

The staff's review of the licensee's proposed RI-ISI program concludes that the program is an acceptable alternative to the current ISI program, which is based on ASME Code, Section XI, requirements for Class 1 and Class 2 welds. In Section 3.1 above, the staff concluded that the licensee's proposed RI-ISI program, as described in its application and supplemental responses to the staff, will provide an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3) with regard to the number of inspections, locations of inspections, and methods of inspections. Therefore, the licensee's request for relief is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the request provides an acceptable level of quality and safety. This safety evaluation authorizes application of the proposed RI-ISI program during the