

**TXU**

**TXU Electric  
Comanche Peak  
Steam Electric Station**  
P.O. Box 1002  
Glen Rose, TX 76043  
Tel: 254 897 8920  
Fax: 254 897 6652  
lance.terry@txu.com

**C. Lance Terry**  
Senior Vice President & Principal Nuclear Officer

Ref: 10CFR140.15

CPSES-200200598  
Log # TXX-02045  
File # 200

February 28, 2002

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
NUCLEAR LIABILITY INSURANCE

Gentlemen:

Certified copies of the following endorsements to our Nuclear Liability insurance  
NELIA policy have been endorsed for your records.

<u>Policy No.</u>	<u>Type</u>	<u>Endorsement No.</u>	<u>Comments</u>
NW-0631	Facility Worker Form	9	Advance & Standard Premium
		10	Name Change
		11	Description of Facility
N-0119	Secondary Financial Protection	22	Annual Premium
		23	Name Change
N-0090	Secondary Financial Protection	25	Annual Premium
		26	Name Change
N-0274	Facility Form	86	Advance & Standard Premium
		87	Change in Subscribing Companies
		88	Limit of Coverage - Terrorism
		89	Advance & Standard Premium 2002
		90	Name Change
		91	Description of Facility

This information is provided to fulfill the financial protection requirements of  
10CFR140.15 with regard to Facility Operating License Nos. NPF-87 and NPF-89 for  
CPSES Units 1 and 2, respectively.

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

M001

TXX-02045

Page 2 of 2

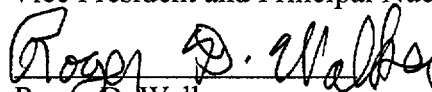
This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,  
Its General Partner

C. L. Terry  
Senior Vice President and Principal Nuclear Officer

By:   
Roger D. Walker  
Regulatory Affairs Manager

JDS/js  
Enclosures

c - E. W. Merschoff, Region IV  
D. N. Graves, Region IV  
D. H. Jaffe, NRR  
Resident Inspectors, CPSES

**NUCLEAR ENERGY LIABILITY INSURANCE  
NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

ADVANCE PREMIUM AND STANDARD PREMIUM ENDORSEMENT

CALENDAR YEAR 2002

1. **ADVANCE PREMIUM:** It is agreed that the Advance Premium due the companies for the period designated above is: **\$46,200.00**
2. **STANDARD PREMIUM AND RESERVE PREMIUM:** In the absence of a change in the Advance Premium indicated above, it is agreed that, subject to the provisions of the Industry Credit Rating Plan, the Standard Premium is said Advance Premium and the Reserve Premium is: **\$34,650.00**

This is to certify that this is a true copy of the original Endorsement having the endorsement number and being made part of the Certificate of Insurance bearing the number designated hereon for insurance coverage under the Nuclear Energy Liability Policy (Facility Workers Form). No insurance is afforded hereunder.



John L. Quattrocchi, Senior Vice President - Underwriting  
American Nuclear Insurers

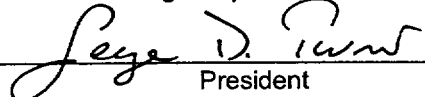
Effective Date of  
this Endorsement: **January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Certificate No. **NW -0631**

Issued To: **TXU Electric Company**

Date of Issue: **November 19, 2001**

For the subscribing companies

By   
President

Endorsement No: **9**

Countersigned by 

CERTIFIED COPY

AMENDMENT OF NAMED INSURED AND ADDRESSES ENDORSEMENT  
AND  
AMENDMENT OF OPERATOR OF THE FACILITY ENDORSEMENT

1. Item 1 of the Declarations, as amended by Endorsement No. 5, is further amended to read:

Item 1.    **Named Insureds and Addresses:**

TXU Generation Company LP  
Energy Plaza  
1601 Bryan Street  
Dallas, TX 75201-3411

2. The Operator of the Facility stated in Item 3 of the Declarations is amended to read:

Operator of the Facility: TXU Generation Company LP

Effective Date of  
this Endorsement: **January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Certificate No. **NW -0631**

Issued to: **TXU Generation Company LP**

Date of Issue: **December 28, 2001**

For the subscribing companies

By Page D. Turner  
President

Endorsement No.: **10**

Countersigned by N. S. Satharudu

**NUCLEAR ENERGY LIABILITY INSURANCE**  
**NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

AMENDMENT OF THE DESCRIPTION OF THE FACILITY ENDORSEMENT

It is agreed that Item 3 of the Declarations, "Description of the Facility," as amended by Endorsement Nos. 1, 3 and 6, is further amended to read:

Location: All of the premises, including the land and buildings and structures of TXU Generation Company LP's Comanche Peak Steam Electric Station, shown as being within the insurance boundaries of the attached drawing, titled "Comanche Peak SES NEIL Site Drawing Insurance Site Description" dated 8/13/99, including the water pipeline between Lake Granbury and Squaw Creek Reservoir but excluding the dam and reservoir contained within the site boundary, and also excluding the Glen Rose Transmission Building contained within the site boundary. The Comanche Peak Steam Electric Station is located on the south bank of Squaw Creek Reservoir near the town of Glen Rose in Somerwell County, Texas, approximately 35 miles southwest of Forth Worth and 67 miles southwest of Dallas, Texas.

Effective Date of  
this Endorsement:

**January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Certificate No. **NW -0631**

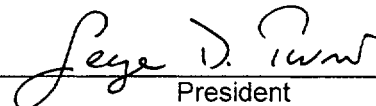
Issued to:

**TXU Generation Company LP**

Date of Issue: **December 28, 2001**

For the subscribing companies

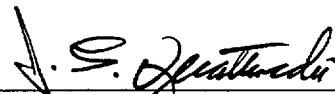
By

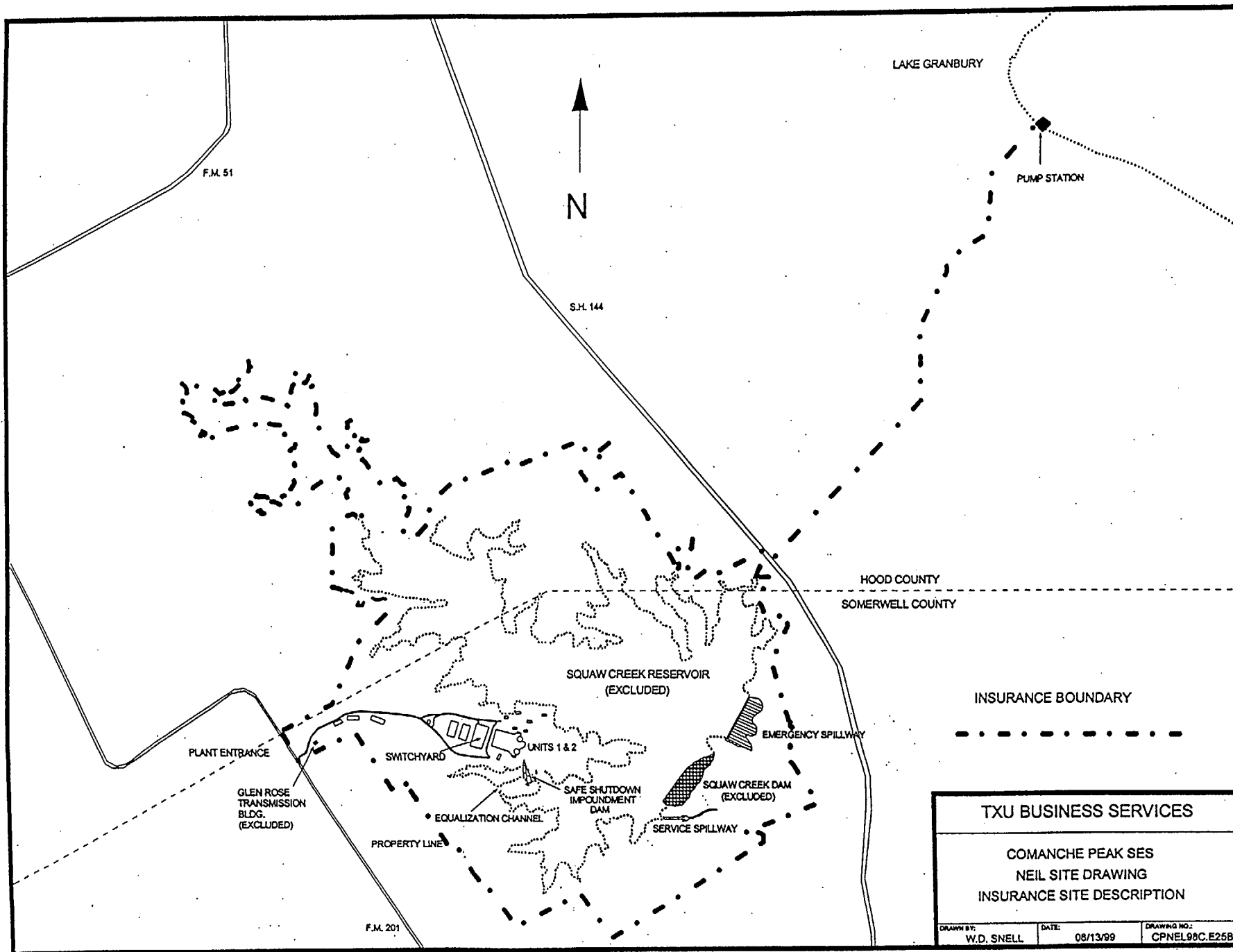
  
President

Endorsement No.:

**11**

Countersigned by





**NUCLEAR ENERGY LIABILITY INSURANCE  
NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

ANNUAL PREMIUM ENDORSEMENT

CALENDAR YEAR 2002

1. **ANNUAL PREMIUM:** It is agreed that the Annual Premium due the companies for the period designated above is: **\$7,500.00**

THIS IS TO CERTIFY THAT THIS IS A TRUE COPY OF THE ORIGINAL CERTIFICATE, BEARING THE NUMBER DESIGNATED HEREON, FOR INSURANCE COVERAGE UNDER THE MASTER POLICY-NUCLEAR ENERGY LIABILITY INSURANCE (SECONDARY FINANCIAL PROTECTION). NO INSURANCE IS AFFORDED BY THIS COPY.



JOHN L. QUATTROCCHI  
SENIOR VICE PRESIDENT - UNDERWRITING  
AMERICAN NUCLEAR INSURERS

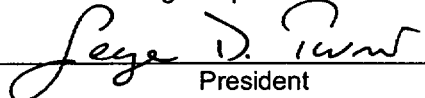
Effective Date of  
this Endorsement: **January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Certificate No. **N -0119**

Issued To: **TXU Electric Company**

Date of Issue: **November 19, 2001**

For the subscribing companies

By   
President

Endorsement No: **22**

Countersigned by 

CERTIFIED COPY

**NUCLEAR ENERGY LIABILITY INSURANCE**  
**NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

ENDORSEMENT TO CERTIFICATE NO. N -0119  
FORMING PART OF MASTER POLICY NO. 1  
NUCLEAR ENERGY LIABILITY INSURANCE  
(SECONDARY FINANCIAL PROTECTION)

It is agreed that:

1. Item 1 of the Declarations, as amended by Endorsement Nos. 7 and 18, is further amended to read:

Item 1.     Named insureds and addresses:

TXU Generation Company LP  
Energy Plaza  
1601 Bryan Street  
Dallas, TX 75201-3411

2. This endorsement amends none of the other provisions of the "Certificate of Insurance, Declarations and Bond for Payment of Retrospective Premiums" of said Certificate No. N -0119.

**THIS IS TO CERTIFY THAT THIS IS A TRUE COPY OF THE ORIGINAL CERTIFICATE, BEARING THE NUMBER DESIGNATED HEREON, FOR INSURANCE COVERAGE UNDER THE MASTER POLICY-NUCLEAR ENERGY LIABILITY INSURANCE (SECONDARY FINANCIAL PROTECTION). NO INSURANCE IS AFFORDED BY THIS COPY.**

**JOHN L. QUATTROCHI**  
**SENIOR VICE PRESIDENT-UNDERWRITING**  
**AMERICAN NUCLEAR INSURERS**

Effective Date of  
this Endorsement:

**January 1, 2002**  
(12:01 A.M. Standard Time)

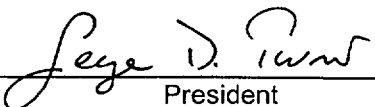
To form a part of Certificate No.   **N -0119**

Issued to:       **TXU Generation Company LP**

Date of Issue:   **January 24, 2002**

For the subscribing companies

By

  
President

Endorsement No.:       **23**

Countersigned by





**NUCLEAR ENERGY LIABILITY INSURANCE  
NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

ANNUAL PREMIUM ENDORSEMENT

CALENDAR YEAR 2002

1. **ANNUAL PREMIUM:** It is agreed that the Annual Premium due the companies for the period designated above is: **\$7,500.00**

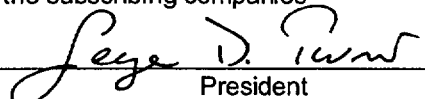
Effective Date of  
this Endorsement: **January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Certificate No. N -0090

Issued To: **TXU Electric Company**

Date of Issue: **November 19, 2001**

For the subscribing companies

By   
President

Endorsement No: **25**

Countersigned by 

**NUCLEAR ENERGY LIABILITY INSURANCE**  
**NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

ENDORSEMENT TO CERTIFICATE NO. N-0090  
FORMING PART OF MASTER POLICY NO. 1  
NUCLEAR ENERGY LIABILITY INSURANCE  
(SECONDARY FINANCIAL PROTECTION)

It is agreed that:

1. Item 1 of the Declarations, as amended by Endorsement Nos. 1, 10 and 21, is further amended to read:

Item 1.     Named insureds and addresses:

TXU Generation Company LP  
Energy Plaza  
1601 Bryan Street  
Dallas, TX 75201-3411

2. This endorsement amends none of the other provisions of the "Certificate of Insurance, Declarations and Bond for Payment of Retrospective Premiums" of said Certificate No. N-0090.

**THIS IS TO CERTIFY THAT THIS IS A TRUE COPY OF THE ORIGINAL  
CERTIFICATE, BEARING THE NUMBER DESIGNATED HEREON, FOR  
INSURANCE COVERAGE UNDER THE MASTER POLICY-NUCLEAR  
ENERGY LIABILITY INSURANCE (SECONDARY FINANCIAL  
PROTECTION). NO INSURANCE IS AFFORDED BY THIS COPY.**

**JOHN L. QUATTROCCHI  
SENIOR VICE PRESIDENT-UNDERWRITING  
AMERICAN NUCLEAR INSURERS**

Effective Date of  
this Endorsement:

**January 1, 2002**  
(12:01 A.M. Standard Time)

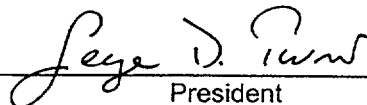
To form a part of Certificate No.   N -0090

Issued to:       **TXU Generation Company LP**

Date of Issue:   **January 24, 2002**

For the subscribing companies

By

  
\_\_\_\_\_  
President

Endorsement No.:     **26**

Countersigned by

  
\_\_\_\_\_

**NUCLEAR ENERGY LIABILITY INSURANCE  
NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

**ADVANCE PREMIUM AND STANDARD PREMIUM ENDORSEMENT**

**CALENDAR YEAR 2000**

It is agreed that Items 1 and 2 of Endorsement No. **82** are amended to read:

1. **ADVANCE PREMIUM:** It is agreed that the Advance Premium due the companies for the period designated above is: **\$210,699.00**

2. **STANDARD PREMIUM AND RESERVE PREMIUM:** In the absence of a change in the Advance Premium indicated above, it is agreed that, subject to the provisions of the Industry Credit Rating Plan, the Standard Premium is said Advance Premium and the Reserve Premium is: **\$161,174.00**

**ADDITIONAL PREMIUM: \$11,778.00**

This is to certify that this is a true copy of the original Endorsement having the endorsement number and being made part of the Nuclear Energy Liability Policy (Facility Form) as designated hereon. No insurance is afforded hereunder.

  
John L. Quattrone, Senior Vice President - Underwriting  
American Nuclear Insurers

Effective Date of  
this Endorsement: **January 1, 2000**  
(12:01 A.M. Standard Time)

To form a part of Policy No. **NF -0274**

Issued To: **TXU Electric Company**

Date of Issue: **April 25, 2001**

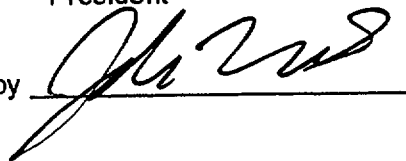
For the subscribing companies

By

  
President

Endorsement No: **86**

Countersigned by



**CERTIFIED COPY**

# NUCLEAR ENERGY LIABILITY INSURANCE

## NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION

### CHANGES IN SUBSCRIBING COMPANIES AND IN THEIR PROPORTIONATE LIABILITY ENDORSEMENT CALENDAR YEAR 2001

1. It is agreed that with respect to bodily injury, property damage, environmental damage or evacuation of the public caused, during the effective period of this endorsement, by the nuclear energy hazard:
  - a. The word "companies" wherever used in the policy means the subscribing companies listed below.
  - b. The policy shall be binding on such companies only.
  - c. Each such company shall be liable for its proportion of any obligation assumed or expense incurred under the policy because of such bodily injury, property damage, environmental damage or evacuation of the public as designated below.
2. It is agreed that the effective period of this endorsement is from the beginning of the effective date of this endorsement stated below to the close of December 31, 2001, or to the time of the termination or cancellation of the policy, if sooner.

ACE American Insurance Company	4.735566 %	
American Home Assurance Company	1.894226 %	
CGU Insurance Company	4.650326 %	
Cincinnati Insurance Company	1.518222 %	
Continental Insurance Company	22.730717 %	
Employers Mutual Casualty Company	0.591946 %	
Federal Insurance Company	14.206698 %	
Fireman's Fund Insurance Company	9.471132 %	
Great American Insurance Company	1.041825 %	
Greenwich Insurance Company	7.103349 %	
Hartford Fire Insurance Company	2.367783 %	
Motors Insurance Corporation	0.422413 %	
Royal Insurance Company of America	4.735566 %	
St. Paul Fire & Marine Insurance Company	17.900439 %	
TIG Insurance Company	0.947113 %	
United States Fire Insurance Company	0.947113 %	
Zurich American Insurance Company	4.735566 %	
Total	<u>100.000000 %</u>	NE-2001

Effective Date of  
this Endorsement:

**January 1, 2001**  
(12:01 A.M. Standard Time)

To form a part of Policy No. **NF -0274**

Issued to: **TXU Electric Company**

Date of Issue: **May 7, 2001**

For the subscribing companies

By *Sege D. Tunn*  
President

Endorsement No.:

**87**

Authorized Representative

*J. S. [Signature]*

**NUCLEAR ENERGY LIABILITY INSURANCE**  
**NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

**LIMITATION OF COVERAGE FOR TERRORIST ACTS**  
**(ONE SHARED INDUSTRY AGGREGATE LIMIT)**

It is agreed that with respect to bodily injury, property damage or environmental damage caused by the nuclear energy hazard and arising out of a terrorist act:

1. the total aggregate liability of the companies shall be \$200,000,000 regardless of (i) the number of terrorist acts affecting this or any other nuclear energy liability policy (Facility Form or Supplier's and Transporter's Form) or (ii) the number of nuclear energy liability policies (Facility Form or Supplier's and Transporter's Form) issued by the Nuclear Energy Liability Insurance Association under which coverage may be sought.
2. the limit of liability shown in Item 4 of the policy Declarations or as amended by endorsement to this policy is subject to the industry aggregate limitation described in paragraph 1 above.
3. the companies may, at their option, reinstate the one shared industry aggregate limit of \$200,000,000, provided that any such reinstatement approved by the companies shall not exceed the balance in the Industry Credit Rating Plan reserve fund.
4. the term "terrorist act" as used herein means a violent or otherwise hostile act or an act dangerous to human life, tangible or intangible property or infrastructure by any person or group, whether acting alone or on behalf of any organization or government, which causes damage to property or injury to persons, or represents a threat thereof and appears to be intended to (i) intimidate or coerce a civilian population; or (ii) disrupt any segment of an economy; or (iii) influence the policy of a government by intimidation or coercion; or (iv) affect the conduct of a government by mass destruction, assassination, kidnapping or hostage-taking.

Effective Date of  
this Endorsement:

**January 1, 2002**  
(12:01 A.M. Standard Time)

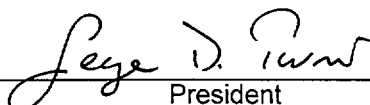
To form a part of Policy No. **NF -0274**

Issued to: **TXU Electric Company**

Date of Issue: **December 17, 2001**

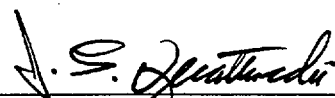
For the subscribing companies

This is to certify that this is a true copy of the original  
Endorsement having the endorsement number and being made part  
of the Nuclear Energy Liability Policy (Facility Form) as des-  
ignated hereon. No insurance is afforded hereunder.

By   
President

John L. Quattrocchi, Senior Vice President-Underwriting  
American Nuclear Insurers

Endorsement No.: **88**

Countersigned by 

**NUCLEAR ENERGY LIABILITY INSURANCE  
NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

ADVANCE PREMIUM AND STANDARD PREMIUM ENDORSEMENT

CALENDAR YEAR 2002

1. **ADVANCE PREMIUM:** It is agreed that the Advance Premium due the companies for the period designated above is: **\$375,903.00**
2. **STANDARD PREMIUM AND RESERVE PREMIUM:** In the absence of a change in the Advance Premium indicated above, it is agreed that, subject to the provisions of the Industry Credit Rating Plan, the Standard Premium is said Advance Premium and the Reserve Premium is: **\$288,037.00**

Effective Date of  
this Endorsement: **January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Policy No. **NF -0274**

Issued To: **TXU Electric Company**

Date of Issue: **December 12, 2001**

For the subscribing companies

By *Lege D. Turner*  
President

Endorsement No: **89**

Countersigned by *J. S. Heathwood*

**NUCLEAR ENERGY LIABILITY INSURANCE**  
**NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

AMENDATORY ENDORSEMENT

It is agreed that:

1. Item 1 of the Declarations, "Named Insured," as amended by Endorsement Nos. 6, 12, 29, 30, 51 and 80, is further amended to read:

Item 1.    Named Insured:        TXU Generation Company LP

2. The Operator of the facility stated in Item 3 of the Declarations, as amended by Endorsement No. 80, is further amended to read:

TXU Generation Company LP

Effective Date of  
this Endorsement:

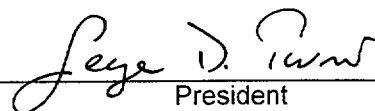
**January 1, 2002**  
(12:01 A.M. Standard Time)

To form a part of Policy No. **NF -0274**

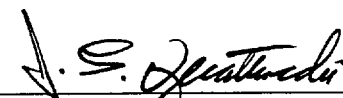
Issued to:        **TXU Generation Company LP**

Date of Issue:    **December 28, 2001**

For the subscribing companies

By   
President

Endorsement No.:        **90**

Countersigned by 

**NUCLEAR ENERGY LIABILITY INSURANCE**  
**NUCLEAR ENERGY LIABILITY INSURANCE ASSOCIATION**

AMENDMENT OF THE DESCRIPTION OF THE FACILITY ENDORSEMENT

It is agreed that Item 3 of the Declarations, "Description of the Facility," as amended by Endorsement Nos. 21, 48, 72 and 81, is further amended to read:

Location: All of the premises, including the land and buildings and structures of TXU Generation Company LP's Comanche Peak Steam Electric Station, shown as being within the insurance boundaries of the attached drawing, titled "Comanche Peak SES NEIL Site Drawing Insurance Site Description" dated 8/13/99, including the water pipeline between Lake Granbury and Squaw Creek Reservoir but excluding the dam and reservoir contained within the site boundary, and also excluding the Glen Rose Transmission Building contained within the site boundary. The Comanche Peak Steam Electric Station is located on the south bank of Squaw Creek Reservoir near the town of Glen Rose in Somerwell County, Texas, approximately 35 miles southwest of Forth Worth and 67 miles southwest of Dallas, Texas.

Effective Date of  
this Endorsement:

**January 1, 2002**  
(12:01 A.M. Standard Time)

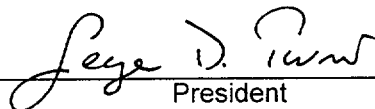
To form a part of Policy No. **NF -0274**

Issued to:

**TXU Generation Company LP**

Date of Issue: **December 28, 2001**

For the subscribing companies

By   
President

Endorsement No.:

**91**

Countersigned by





