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CP-201500441
TXX-15067

Ref. # 10CFR50.55a

April 16, 2015

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT UNIT 2, DOCKET NO. 50-446
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION, 2RF14 STEAM
GENERATOR TUBE INSERVICE INSPECTION REPORT - TAC NO. MF5052

REFERENCE: 1) Luminant Power letter, logged TXX-14127, from Rafael Flores to the U. S. Nuclear
Regulatory Commission dated October 21, 2015, 2RF14 Steam Generator Inservice
Inspection 180-Day Report

Dear Sir or Madam:

By means of the letter in Reference 1, Luminant Generation Company LLC (Luminant Power) previously submitted the Comanche Peak Nuclear Power Plant (CPNPP) Unit 2 Model D5 steam generator tube inspection report for 2RF14 as required by Technical Specification 5.6.9.

Based upon questions provided by Mr. Balwant Singal of the NRC in an email dated March 17, 2015, Luminant Power hereby provides the following additional information regarding the report detailed in Reference 1. The attachment to this letter contains the NRC questions and Luminant Power's response immediately following each question.

This communication contains no new licensing basis commitments regarding Comanche Peak Unit 2.

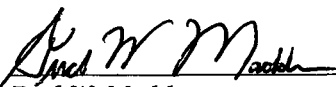
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Should you have any questions, please contact Mr. Jim Barnette at (254) 897-5866 or James.barnette@luminant.com.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: 
Fred W. Madden
Director, External Affairs

Attachment - Luminant Power Response to Request for Additional Information, 2RF14 Steam Generator Tube Inspection Report - TAC No. MF5052

c - Marc L. Dapas, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak

Attachment to TXX-15067
(4 pages not including this cover page)

Comanche Peak Nuclear Power Plant

**Luminant Power Response to Request for Additional Information
2RF14 Steam Generator Tube Inspection Report
TAC No. ME5052**

Docket No. 50-446

Luminant Power Response to Request for Additional Information

2RF14 Steam Generator Tube Inspection Report TAC No. MF5052

1. For the seven tubes showing strong evidence of high residual stress, please discuss the following:
 - a. Were these tubes low row or high row "-2 sigma" tubes, or was there some other indicator of the high residual stress?

Luminant Response:

These tubes were plugged based on the eddy current data showing evidence of high residual stress in accordance with EPRI SGMP Letter dated 9/14/2004, "SGMP Information Letter on Example Methodology for Screening of Alloy 600TT Tubing for the Seabrook Elevated Stress Issue." The following plugged tubes are considered to have U-bend offset signals indicative of elevated residual stress in low row tubes: R1C23, R1C89, R2C88, R2C92, R2C93, and R5C61 (all tubes were in SG 2). For SG 1, R27C28 is considered to contain possible elevated residual stress in a high row tube (-2 sigma tube).

- b. Has an analysis of all tubes in all four SGs been performed to identify all tubes with the potential of high residual stress?

Luminant Response:

Yes, screening of all Unit 2 tubes in all four SGs has been performed to identify low row tubes (rows 1 through 9) and high row tubes (row 10 and higher) that may contain eddy current signals indicative of tubes containing possible elevated residual stress.

- c. Are there any tubes with potentially elevated residual stress (low row offset, -2 sigma tubes) in service? If so, how many?

Luminant Response:

Yes, there are potentially elevated residual stress tubes (both low row offset and -2 sigma tubes) in service. Table 1, shows the remaining potentially elevated residual stress tubes in each steam generator. These tubes are examined when the applicable SG is available for eddy current inspection.

2. Under Table 3D on page 14 of 25 of the Enclosure, a note mentions legacy indications being shown in blue/italic font, but none are shown in the table. Please confirm whether or not Table 3D does, in fact, include any legacy indications. If not, please include them in your response.

Luminant Response:

See revised Table 3D on page 3 of this attachment. Legacy indications resulting from parts removed from their vicinity in prior outages are shown in blue font, or with an asterisk (*) in the SGID column. The new indications are in black font.

3. Please discuss the results of your tube plug inspections. Were all plugs present and in their proper locations? Was any degradation observed?

Luminant Response:

Each plugged tube was inspected. No degradation was observed and each plug was present in their correct tube.

4. Table 3A of the Enclosure provides the number of anti-vibration bar (AVB) wear indications detected. Were all tubes with prior indications inspected (i.e., do the values in Table 3A provide the total number of AVB wear indications or just a subset of the total since a sampling program was implemented during RFO 14)?

Luminant Response:

Yes, all tubes with prior indications were inspected. Table 3A (page 4 of this attachment) provides the total number of AVB wear indications found since the first primary side inspection outage for Unit 2. The new AVB wear indications are only derived from the sampling program during RFO 14.

Table 3D. Summary of Loose Part Wear Indications

SGID	Outage	Row	Col	Volts	Deg	Ind	Per	CrLen	CrWid	Chn	Locn	Inch1	BegT	EndT	PDia	PType	Cal
1	U2RF1	48	38	0.22	0	PCT	4			P3	C2	0.14	C11	CTE	0.61	ZBAZC	54
2*	U2RF1	6	1	0.12	0	VOL	17	0.14	0.2	P4	C1	0.51	C1	C1	0.61	ZPS3C	16
2*	U2RF1	6	2	0.3	0	VOL	27	0.14	0.17	6	C1	0.44	C1	C1	0.61	ZPS3C	16
2*	U2RF1	6	2	0.14	0	VOL	16	0.11	0.19	6	C1	0.91	C1	C1	0.61	ZPS3C	16
2	U2RF1	12	23	0.07	0	PCT	10	0.16	0.30	P4	C6	0.35	C6	C6	0.61	ZPS3C	32
2	U2RF1	13	23	0.04	0	PCT	6	0.20	0.35	P4	C6	0.39	C6	C6	0.61	ZPS3C	32
2	U2RF1	12	24	0.22	98	VOL	19	0.15	0.33	6	C6	0.55	C6	C6	0.61	ZPS3C	14
2*	U2RF1	3	114	0.2	260	PCT	24	0.18	0.21	P4	C4	0.41	C4	C4	0.61	ZPS3C	14
2*	U2RF1	4	114	0.14	0	PCT	17	0.18	0.2	P4	C4	0.43	C4	C4	0.61	ZPS3C	14
4	U2RF1	26	69	0.18	0	PCT	19	0.41	0.43	6	C2	1.31	C2	C2	0.61	ZPS3C	52
4	U2RF1	32	71	0.28	0	PCT	25	0.24	0.34	6	C2	0.55	C2	C2	0.61	ZPS3C	52
4	U2RF1	34	77	0.15	0	PCT	16	0.21	0.31	6	C2	0.5	C2	C2	0.61	ZPS3C	52

Legacy indications resulting from parts removed from their vicinity in prior outages are shown in blue font or with an asterisk (*) in the SGID column. Those in black font represent new indications.

Table 1: List of Active Tubes with Potentially Elevated Residual Stress.

No	SG -1		SG - 2		SG - 3		SG - 4	
	Row	Col	Row	Col	Row	Col	Row	Col
1	18	5	36	35	14	24	29	15
2	16	6	10	36	44	30	18	26
3	17	8	47	37	42	31	10	31
4	18	13	20	45	14	35	10	34
5	17	19	10	48	12	47	10	35
6	21	22	49	50	12	48	32	35
7	33	55	1	55	12	49	10	36
8			1	95	13	50	15	36
9					14	50	10	37
10					12	52	10	53
11					14	57	28	55
12					11	58	13	77
13					13	59	13	82
14					13	62	28	88
15					44	63	15	103
16					11	65		
17					24	66		
18					49	72		
19					48	78		
20					38	79		
21					49	79		
22					48	80		
23					49	80		
24					48	81		
25					14	83		
26					48	83		
27					48	84		
28					28	85		
29					48	85		
30					12	86		
31					48	86		
32					28	91		
33					38	93		
34					25	102		