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TXX-15085

Ref. # 10CFR50.55a

June 1, 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, 2014, 2RF14 Steam Generator Inservice
Inspection 180-Day Report
2) Luminant Power letter, logged TXX-15067, from Rafael Flores to the U. S. Nuclear
Regulatory Commission dated April 16, 2015, Unit 2, Docket No. 50-446 Response
to Request for Information, 2RF14 Steam Generator Tube Inservice Inspection
Report - TAC No. MF5052

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. Luminant Power also provided response to a request for additional information (RAI) by means of the letter in Reference 2.

Based upon additional questions provided by Mr. Balwant Singal of the NRC in an email dated May 13, 2015, Luminant Power hereby provides clarification of information provided in the Reference 2 response. The attachment to this letter contains the NRC questions followed by Luminant Power's response to the questions.

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

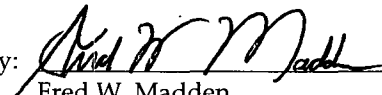
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Should you have any questions, please contact Mr. Jim Barnette at (254) 897-5866 or James.barnette@luminant.com.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: 
Fred W. Madden
Director, External Affairs

Attachment - Luminant Power Response to the May 13, 2015 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

Luminant Power Response to the May 13, 2015 Request for Additional Information
2RF14 Steam Generator Tube Inspection Report TAC No. MF5052

NRC RAI Dated May 13, 2015:

By letter dated October 21, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14302A067), Luminant Generation Company LLC (the licensee) submitted Refueling Outage 2RF14 Steam Generator Tube Inspection 180 day report for Comanche Peak Nuclear Power Plant, Unit 2 for the U.S. Nuclear Regulatory Commission (NRC) staff review. By letter dated April 16, 2015 (ADAMS Accession No. ML15114A198), the licensee provided response to Request for Additional Information (RAI) dated March 17, 2015. Response to RAI No. 4 states:

“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.”

However, Table 3A referred in the RAI response was not provided as part of the response. Please clarify if the licensee intended to include Table 3A in its response dated April 16, 2015. If so, when you state that Table 3A has wear indications found since the first primary side inspection, do you mean only those that are currently in service?

NRC RAI question No. 4 from the March 17, 2015 RAI:

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 Power Revised Response:

Yes, all tubes with prior indications were inspected. Table 3A provides the total number of AVB wear indications found since the first primary side inspection outage for Unit 2 including tubes with AVB wear indications that have been plugged. The new AVB wear indications are only derived from the sampling program during RFO 14.

Table 3A: Summary of AVB Wear Indications in 2RF14

	SG1	SG2	SG3	SG4	Total
Number of AVB Indications	185	50	58	36	329
Maximum Depth, % TW	38	40	31	24	40
Number of 'New' Indications	25	8	5	14	52
Number of > 20% TW "New" Indications	1	0	0	0	1