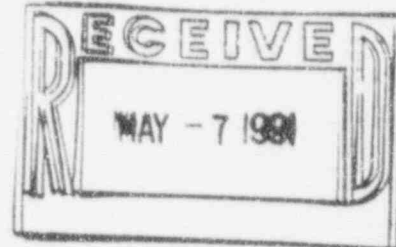




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 IR 90-46

William J. Cahill, Jr.
 Executive Vice President

May 6, 1991



Mr. R. D. Martin, Regional Administrator
 U. S. Nuclear Regulatory Commission
 Region IV
 611 Ryan Plaza Drive, Suite 1000
 Arlington, Texas 76011

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NOS. 50-445 AND 50-446
 COMMENTS ON SYSTEMATIC ASSESSMENT OF LICENSEE
 PERFORMANCE (SALP)

Dear Mr. Martin:

By letter dated March 23, 1991, the Nuclear Regulatory Commission (NRC) transmitted the Systematic Assessment of Licensee Performance (SALP) Report for Comanche Peak Steam Electric Station (CPSES) to TU Electric. This report documented the staff's assessment of the performance of TU Electric with regard to CPSES during the period September 1, 1989, through January 31, 1991.

The staff concluded that TU Electric's performance reflects strong management support, good programs, and a well qualified staff. The staff also concluded that performance was viewed as improving throughout the assessment period. The staff noted that a common theme in the various functional areas was the high degree of management involvement and attention provided to problem identification and self-assessment initiatives.

The staff identified weaknesses in the adequacy of some technical evaluations, the material condition of the secondary plant, implementation of the safety clearance/tagout program, implementation of the surveillance testing program, and the failure to identify and correct the causes of weaknesses in the initial operator license training program. The staff also stated that TU Electric's superior startup performance would support a quality startup program for Unit 2 and the radiological controls program was very good but had not been challenged by a major outage.

TU Electric has carefully reviewed and evaluated the information contained in the SALP Report and, as stated at the meeting of April 18, 1991, finds it to be accurate and agrees with the overall conclusions and recommendations contained therein. TU Electric has initiated actions in response to the recommendations and to effect improvements in the areas of weaknesses identified by the NRC in the SALP Report.


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TU Electric is applying the lessons learned from the Unit 1 Startup program to the Unit 2 Startup program as recommended by the staff. The Unit 2 Startup program includes personnel with Unit 1 Startup experience. Also it should be noted that the recent outages are allowing the Radiation Control and Maintenance/Surveillance programs to gain valuable experience in preparation for the upcoming refueling outage.

TU Electric has received Citizens Association for Sound Energy's (CASE's) comments on the SALP and will consider them as appropriate during the implementation of any of the recommendations to effect improvements in the areas of weaknesses identified by the NRC in the SALP Report.

Sincerely,



William J. Cahill, Jr.

CBC/cbc

c - Resident Inspectors, CPSES (2)
Mr. J. W. Clifford, NRR
Mr. M. B. Fields, NRR