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Log # TXX-99259
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10010.1
Ref. # 10CFR50.55a(f)

November 23, 1999

J. L. Funches
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSSES)
DOCKET NOS. 50-445 AND 50-446
RISK INFORMED INSERVICE TESTING
(TAC NOS. M94165, M94166, MA2040, and MA2041)

- REF: 1) TXU Letter logged TXX-95260, from C. L. Terry, to
NRC, dated November 27, 1995
1) NRC Letter from T. J. Polich to C. L. Terry dated
August 14, 1998

Gentlemen:

On November 27, 1995, TXU Electric submitted a request (Reference 1) as part of a pilot plant initiative to utilize a risk-informed inservice testing (RI-IST) program to determine inservice test (IST) frequencies for certain valves and pumps that are categorized as low safety significant. This proposal represented an alternative to certain IST requirements in Section XI of the ASME Boiler and Pressure Vessel Code as required by Title 10, Section 50.55a, of the Code of Federal Regulations (10CFR50.55a). On August 14, 1998, the NRC staff approved the RI-IST program at Comanche Peak (Reference 2). TXU Electric supplemented its initial submittal in response to various meetings and NRC requests for additional information as described in Reference 2.

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TXU Electric's participation in this pilot project significantly contributed to the NRC staff's efforts to develop new industry standards (Standard Review Plan Chapter 19, "Use of Probabilistic Risk Assessment in Plant-Specific, Risk-Informed Decisionmaking: General Guidance," and Chapter 3.9.7, "Risk-Informed Inservice Testing") and guidance documents (Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions in Plant-Specific Changes to the Current Licensing Basis," and Regulatory Guide 1.175, "An Approach for Using Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing,"). TXU Electric made a substantial commitment in resources to participate in the RI-IST pilot project.

During the period from October 1, 1995, through September 26, 1998, the NRC invoice fees for the RI-IST review totaled \$100,885.10 for Unit 1 (TAC NOS. M94165 and MA2040) and \$97,707.90 for Unit 2 (TAC NOS. M94166 and MA2041). Since a significant portion of the NRC's review fees were related to the development of standards and guidance documents for industry use, a significant portion of the fees should be invoiced against the general industry budget.

In January, 1999, TXU Electric (R. D. Walker) verbally contacted the NRC Staff (T. J. Polich) to discuss the possibility of fee reimbursements. TXU Electric requests and believes that fee reimbursements are warranted.

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Please contact Roger D. Walker at 254-897-8233 if you have any questions.

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

Sincerely,

C. L. Terry

C. L. Terry

By: *Roger D. Walker*
Roger D. Walker
Regulatory Affairs Manager

CBC/cbc

c - E. W. Merschoff, Region IV
J. I. Tapia, Region IV
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Resident Inspectors, CPSES