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April 16, 2012

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555 ATTN: David B. Matthews, Director Division of New Reactor Licensing

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 3 AND 4 DOCKET NUMBERS 52-034 AND 52-035 INTEGRATED SEISMIC CLOSURE PLAN

Dear Sir:

On September 30, 2011, Luminant submitted an outline of site-specific seismic issues for Comanche Peak Nuclear Power Plant (CPNPP) Units 3 and 4 that remained to be resolved and the high level plan for resolving those issues (ML11276A098). On January 25, 2012, Luminant submitted an update (ML12026A702) stating that the details of the plan could not be finalized until the plan for the seismic design for the US-APWR standard plant structures was known. On March 30, 2012, Mitsubishi Heavy Industries submitted the US-APWR seismic closure plan to the NRC in letter UAP-HF-12082.

Luminant submits herein the Integrated Seismic Closure Plan (ISCP) for CPNPP Units 3 and 4. The ISCP integrates certain actions and data arising from the CPNPP Phase 2 hydrology and seismic reviews along with changes required by revisions to the US-APWR standard plant design. The deliverable dates in the ISCP take into consideration the availability of the specialized resources needed to perform the work and the various other demands for those resources. The ISCP will be refined and updated as work progresses to address these integrated issues.

Should you have any questions regarding the ISCP, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

This submittal completes Regulatory Commitment #8312. There are no new commitments in this letter.

I state under penalty of perjury that the foregoing is true and correct.

Executed on April 16, 2012.

Sincerely,

Luminant Generation Company LLC

Donald R. Woodlan for

Rafael Flores

Attachment: Comanche Peak Nuclear Power Plant Units 3 and 4 Integrated Seismic Closure Plan



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Electronic distribution w/attachment:

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Integrated Seismic Closure Plan

Rev. 0

Integrated Seismic Closure Plan (ISCP)

Mitsubishi Heavy Industries (MHI) has determined that certain revisions to the standard plant seismic design and seismic analysis methodology would be both beneficial and prudent. This Integrated Seismic Closure Plan (ISCP) addresses the impact of these standard plant design revisions on the site-specific design. Luminant and MHI have developed an integrated approach to controlling these design changes to ensure that the changes are coordinated in an efficient manner, and that the impacts of the changes and the interactions between the changes are carefully considered. This ISCP includes changes arising from the following sources:

- Standard plant seismic analysis methodology and results
- Site-specific design changes needed to incorporate standard plant design changes
- A revised site-specific post-construction groundwater level
- NRC Requests for Additional Information

This document provides:

- The detailed ISCP and licensing strategy to address site-specific changes and seismic issues
- Details of the revisions to FSAR Sections 3.7, 3.8, and associated appendices based on the revised seismic analyses and structural design of the standard plant and site-specific structures
- Details of the revisions to the remaining portions of the COLA to reflect the analysis results and design changes

The ISCP addresses the following site-specific seismic issues:

- Impact of changing the post-construction groundwater level (GWL) including assessment of stability and structural integrity of structures
- The new EPRI guidance on earthquake sources in the Central and Eastern United States (CEUS)
- Impact of considering structure-soil-structure interaction effect
- SASSI subtraction methodology for analyses of embedded foundations by use of the modified subtraction method
- Updates to responses to RAI No. 5798 (CP RAI #221) and RAI No. 5947 (CP RAI #226)
- Submittal of the response to RAI No. 6266 (CP RAI #247)

The ISCP includes the following standard plant seismic activities:

• Identify subsections of the COLA, in particular FSAR Chapter 3 and related Appendices, which are impacted by changes in standard plant design

- Provide a mark-up of the COLA where changes to standard plant configuration or numerical results occur (e.g., FSAR Appendix 3NN)
- Assess the standard plant design to determine which aspects of the DCD design impact the site-specific design for standard plant structures and site-specific structures, and identify the CPNPP products which are impacted (e.g., require confirmation, reanalysis or updating, FSAR Appendices 3KK, 3NN, and 3LL)

The licensing strategy for the order of the analyses of site-specific and standard plant structures is to perform the analyses for the site-specific structures first followed by the site dependent analyses for the standard plant structures. The order of work takes into account the amount of work and available resources to perform the work. The order is of analyses is as follows:

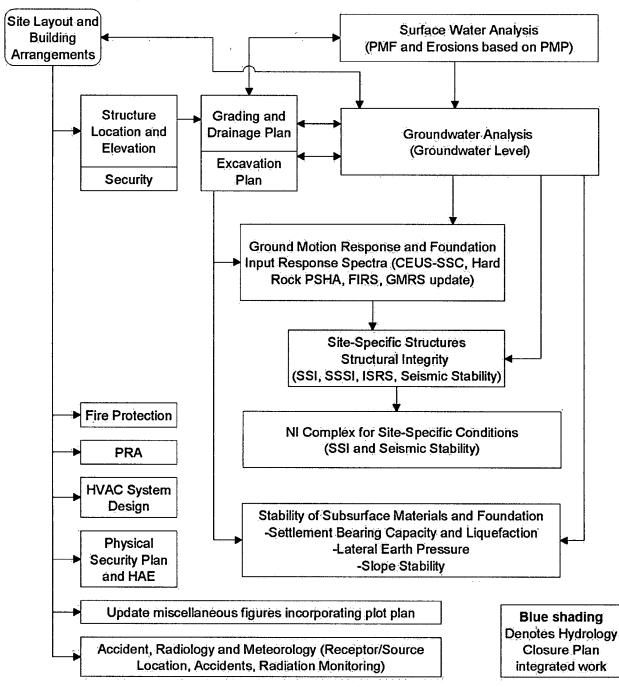
- Develop an evaluation of the Nuclear Island (NI) Complex which shows that the site-specific SSI analysis results of the NI Complex are enveloped by DCD SSI analysis results (September 2012)
- Perform the site-specific SSI and SSSI analyses of the site-specific structures (April 2013)
- Perform a site-specific SSI analysis of the embedded NI Complex using the modified subtraction method (June 2013)

The ISCP addresses the following activities based on the impacts from the standard plant design changes to the remainder of the COLA:

- Identify parts of the COLA which need to be revised to show new standard plant structure configuration and provide a markup
- Identify any analyses that need to be revised to reflect the new standard plant structure configuration and prepare revisions to those analyses

General Strategy

Following is a flow diagram of the ISCP work.



Schedule of Submittals

Luminant plans to provide COLA changes in Update Tracking Reports (UTRs) as the work progresses. Luminant's schedule has been created by integrating the changes caused by hydrology issues and seismic issues listed above. The changes resulting from this ISCP will be provided in five UTRs as information becomes available.

- September 2012 Evaluation of the Nuclear Island (NI) Complex which shows that the sitespecific SSI analysis results of NI Complex are enveloped by DCD SSI analysis results
- October 2012 FSAR Revision 3 UTR Revision 0 will contain:
 - Updates to the plot plan (Section 1.2, and 2.1)
 - Atmospheric dispersion (Section 2.3)
 - Aircraft hazards (Section 3.5)
 - Main control room habitability (Section 6.4)
 - Grounding and lightning protection (Section 8.3)
 - HVAC (Section 9.4)
 - Radiation protection (Section 12.3)
 - PRA (Section 19.1)
- October 2012 a separate letter will submit updates to the Physical Security Plan and High Assurance Evaluation
- **November 2012** ER Revision 3 UTR Revision 0 will contain the updates described in the attached table of COLA impacts.
- February 2013 FSAR Revision 3 UTR Revision 1 will contain:
 - Updates to reflect the updated EPRI guidance for the earthquake sources in the CEUS (Section 2.5)
 - Fire protection (Section 9.5 and Appendix 9.A)
- April 2013 -
 - FSAR Revision 3 UTR Revision 2 (updated site-specific seismic analyses in Section 3.7, 3.8 and Appendices 3H, 3J, 3J, 3KK, 3LL, and 3MM)
 - Updated responses to RAI 221 and 226 (updated site-specific seismic analyses)
 - Response to RAI 247 (updated site-specific seismic analyses)
- June 2013 FSAR Revision 3 UTR Revision 3 will contain the site-specific analysis of the NI complex (Section 3.7, 3.8 and Appendix 3NN).

COLA Impacts

Luminant has performed a preliminary review of the COLA to identify the impacts that the currently defined seismic work will have on the COLA content. The attached table provides a summary of the planned changes and includes the UTR or letter in which Luminant expects to submit those changes. Luminant will revise this information as the DCD and COLA seismic work progresses.

RAIs

Luminant intends to update and submit the RAIs directly impacted by the ISCP as noted above (RAIs 221, 226 and 247). Luminant will also review potentially-related RAIs to ensure that the FSAR still addresses issues from those RAIs which remain valid. At this time, Luminant does not anticipate revising any RAI responses other than those listed above but will address any NRC staff concerns if the NRC feels the response to a specific question might need to be clarified.

Basis Documents

A list of affected basis documents and their completion dates is being created and Luminant plans to provide the list to the NRC upon completion.

ISCP Updates

Luminant will keep the NRC informed of changes and updates to this ISCP.

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
	CO	-A Part 2, Final Safety Analysis Report	
FSAR Section 1.2	Figures 1.2-1R 1.2-201 through 1.2-210	Revise figures to reflect revised Seismic design methodology and new common basemat arrangement	UTR R0 10/2012
FSAR Section 2.0	Table 2.0-1R	 Revise 'Geology, Seismology, and Geotechnical Engineering,' 'Atmospheric Dispersion Factors for Onsite Locations', and 'Vibratory Ground Motion' information to reflect revised DCD and COLA seismic information, including increased gaps between structures and revised GMRS Note: No changes are expected to the X/Q however the distance and direction between source and receptor will change 	UTR R1 02/2013
FSAR Section 2.1	Figure 2.1-201	Revise to reflect common foundation and the new plant layout	UTR R0 10/2012
FSAR Section 2.3	Figure 2.3-380	Revise to reflect common foundation and the new plant layout	UTR R0 10/2012
FSAR Section 2.3	Table 2.3-338,	Revise table to reflect changes in receptors and sources. X/Q values are not likely to change, confirmation on 7/2012.	UTR R0 10/2012
FSAR Subsection 2.4.3	Figures 2.4.3-209	Revise to reflect common foundation and the new plant layout based on wind wave calculation revision and as necessary	See Hydrology Plan

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Attachment – COLA Impacts

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Subsection 2.4.2, & 2.4.3	Subsection 2.4.2 and 2.4.3, Table 2.4.2-207, Table 2.4.2- 208, Table 2.4.2-209, Figure 2.4.2-202, 2.4.2-206, 2.4.2- 207.	Revised text, tables and figures for Surface Hydrology issues resulting from changes to Calculations 036, 037 and 013 and to reflect common foundation and the new plant layout	See Hydrology Plan
FSAR Subsection 2.4.12	Figures 2.4.12-208; 2.4.12- 210; 2.4.12-212 thru 2.4.12- 216, Table 2.4.12-211	Revise figures, tables, and text to reflect common foundation and the new plant layout increased gaps between structures and/or changes in the grading and drainage plan. FSAR text changes based on GWL and/or path for BAT Failure Analysis.	See Hydrology Plan
FSAR Subsection 2.4.13	Section 2.4.13, Figure 2.4.13-201, Table 2.4.13-202 thru 2.4.13-211	Revise figures, tables, and text to reflect common foundation and the new plant layout. FSAR text changes based on GWL and/or path for BAT Failure Analysis. Update tank failure concentration amounts in the fill and Squaw Creek Reservoir.	See Hydrology Plan
FSAR Subsection 2.5.1	All section text, figures and tables	Update with new seismicity catalog (CEUS) as well as post 2009 earthquakes and human induced events	UTR R1 02/2013
FSAR Subsection 2.5.2.1	All section text, figures and tables	Update with new seismicity catalog (CEUS) as well as post 2009 earthquakes and human induced events	UTR R1 02/2013
FSAR Subsection 2.5.2.2	All section text, figures and tables	Revise to replace EPRI-SOG with CEUS model parameters	UTR R1 02/2013
FSAR Subsection 2.5.2.3	All section text, figures and tables	Revise based on changes in Subsection 2.5.2.2	UTR R1 02/2013
FSAR Subsection 2.5.2.4	All section text, figures and tables	Revise based on new calculated UHS PSHA results	UTR R1 02/2013

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COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Subsection 2.5.2.6	All section text, figures and tables	Recalculate GMRS and FIRS based on new foundation configuration, and input control elevations	UTR R1 02/2013
FSAR Subsection 2.5.3	All section text, figures and tables	Update with new seismicity catalog (CEUS) as well as post 2009 earthquakes and human induced events	UTR R1 02/2013
FSAR Subsection 2.5.4	Section 2.5.4, Figures 2.5.4- 201 thru 2.5.4-203; 2.5.4- 212 thru 2.5.4-217; 2.5.4- 242 thru 2.5.4-244 2.5.4-246 thru 2.5.4-261	Revise text, tables and figures to reflect common foundation and the new plant layout. Consider impact of new foundation bottom. Settlement, Shear wave velocity, Bearing Capacity and Liquefaction – Update text and tables to reflect new Seismic methodology and new plant arrangement	See Hydrology Plan
FSAR Subsection 2.5.5	Section 2.5.5, Figures 2.5.5- 201 and 2.5.5-204 thru 2.5.5-216	Revise text, tables and figures to reflect common foundation and the new plant layout.	See Hydrology Plan
FSAR Subsection 3.5.1.6	Aircraft Hazards	Revise evaluation due to the change of the plant layout	UTR R0 10/2012
FSAR Section 3.7, 3.7.1.1	Foundation input response spectra (FIRS)	Revise FIRS and Figure 3.7-201 to reflect the new foundation elevation of common NI structures for PS/Bs, R/B, A/B and to address the new CEUS input (i.e., PSHA revision will revise all input profiles and FIRS)	UTR R2 04/2013
FSAR Subsection 3.7.1.2	Damping Value	Revise analysis description to reflect common NI basemat.	UTR R2 04/2013
FSAR Subsection 3.7.1.3	Table 3.7.1-3R Basemat dimensions	Revise foundations and dimensions to reflect common NI basemat. Revise Table 3.7.1-3R	UTR R3 06/2013

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COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Subsection 3.7.2.1	Seismic Analysis Method	Revise Table 3.7.2-1R to reflect common NI basemat structures	UTR R3
			06/2013
FSAR Subsection 3.7.2.4.1	Site Specific Analysis of Standard Plant	Revise text to reflect common NI basemat structures. Update the shear wave velocity and Table 2.7-203 to reflect the water	UTR R3
		level and new foundation level as applicable. Revise water table to reflect the ground water evaluation.	06/2013
FSAR Subsection 3.7.2.8	Interaction of Non-Category I Structures with Seismic Category I Structures	Revise text to reflect common NI basemat structures. Add site-specific SSSI analyses and results as applicable	UTR R2
			04/2013
FSAR Subsection 3.7.4.1	Comparison with Regulatory Guide 1.12	Location of seismic monitor description is modified to reflect common basemat NI structures.	UTR R2
0.7.4.1			04/2013
FSAR Subsection 3.8.4.1.3	ESWPT, UHSRS, PSFSVs and Other Site-Specific Structures	Revise Figure 3.8-201 to reflect the common basemat NI structures	UTR R2
0.0.4.1.0		and Redesign of PSFSV access.	04/2013
		Revise Figure 3.8-202 through 214 to accommodate the structural design for new ground water table as applicable.	
		Install parapets to reduce soil pressure on PS/Bs for ESWPT portion connected integrally to PSFSV, as necessary	
FSAR Subsection 3.8.5.4.4	Settlement	Update as required to reflect impact of revised structural calculations on settlement analyses	UTR R3
			06/2013

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Subsection 3.8.5.5	Sliding/overturning and Bearing Pressure	Update sliding/overturning analyses results in Table 3.8-203 based on updated water level.	UTR R2
		Bearing pressures Table 3.8-202 based on updated water level and reflect the new combined basemat for N.	04/2013
FSAR Subsection 3.8.7, Reference	References	Delete reference to MUAP-10001 or IBR DCD. Update MUAP-10006 revision number.	UTR R2
			04/2013
FSAR Appendix 3KK.2	UHSRS SSI Model	Update the text and Figure 3KK-1 to reflect the combined the 2 adjacent structures as applicable.	UTR R2
		Update the text to reflect the combined basemat for NI	04/2013
		Add SSSI effect for UHSRS.	
FSAR Appendix 3KK.3	UHSRS SSI results	Update the analysis result and Tables 3KK-3 through 3KK-7 and 3KK-9 to reflect the updated ground water elevation.	UTR R2
		For some profiles, extend the maximum SSI cutoff frequencies for embedded models to 50 Hz.	04/2013
		Revise Shear Force in Figure 3KK-2.	
FSAR Appendix	UHSRS SSI ISRS	Revise In-structure Response Spectra (ISRS) in Figure 3KK-3.	UTR R2
3KK.4			04/2013
FSAR Appendix 3KK.5	References	Update ACS SASSI from 2.2 to 2.3.0	UTR R2
UNIX.U			04/2013

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Appendix 3LL.2	SSI model for ESWPT	Update the text and Figures to reflect the redesign of PSFSV access and installing parapets to reduce soil pressure on PS/Bs for ESWPT portion connected integrally to PSFSV, as necessary.	UTR R2 04/2013
		Update the text to reflect the combined basemat for NI Add SSSI effect for ESWPT.	
FSAR Appendix 3LL.3	ESWPT SSI results	Update the analysis result and Tables to reflect the updated ground water elevation. For some profiles, extend the maximum SSI cutoff frequencies for embedded models to 50 Hz. Revise Shear Force in Figures.	UTR R2 04/2013
FSAR Appendix 3LL.4	ESWPT SSI ISRS	Revise In-structure Response Spectra (ISRS) in Figures.	UTR R2 04/2013
FSAR Appendix 3LL.5	References	Update ACS SASSI from 2.2 to 2.3.0	UTR R2 04/2013
FSAR Appendix 3MM.2	SSI model for PSFSV	Update the text and Figures to reflect the redesign of PSFSV as necessary. Update the text to reflect the combined basemat for NI Add SSSI effect for PSFSV.	UTR R2 04/2013

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Attachment – COLA Impacts

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Appendix 3MM.3	PSFSV SSI results	Update the analysis result and Tables to reflect the updated ground water elevation.	UTR R2
		For some profiles, extend the maximum SSI cutoff frequencies for embedded models to 50 Hz.	04/2013
		Revise Shear Force in Figures.	
FSAR Appendix 3MM.4	PSFSV SSI ISRS	Revise In-structure Response Spectra (ISRS) in Figures.	UTR R2 04/2013
FSAR Appendix 3MM.5	References	Update ACS SASSI from 2.2 to 2.3.0	UTR R2 04/2013
FSAR Appendix 3NN.1	SSI model for NI	Update the text to reflect the combined basemat for NI	UTR R3 06/2013
FSAR Appendix 3NN.2	SSI model for NI	Update the text to reflect the combined basemat for NI Add SSSI effect for NI.	UTR R3 06/2013
FSAR Appendix 3NN.3	NI SSI input	Update the text to reflect the combined basemat for NI	UTR R3 06/2013
FSAR Appendix 3NN.4	NI SSI model	Update the analysis result and Tables to reflect the updated ground water elevation.	UTR R3
		Revise Shear Force in Figures.	06/2013

Rev. 0

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Appendix 3NN.5	NI SSI model	Revise In-structure Response Spectra (ISRS) in Figures.	UTR R3 06/2013
FSAR Appendix 3NN.6	References	Update ACS SASSI from 2.2 to 2.3.0	UTR R3 06/2013
FSAR Section 6.4	Subsection 6.4.4.1 and 6.4.4.2	Check or update calculations for MCR habitability analysis due to the Standard Design plant layout and yard arrangement based on potential changes to HVAC capacity (Ch. 9.4), locations of chemicals and MCR intake, and X/Q changes.	UTR R0 10/2012
FSAR Section 8.3	Figure 8.3.1-201 (Figures of Ground Grid and Lightning Protection System)	Revised the figure to comply with new site plan.	UTR R0 10/2012
FSAR Section 9.4	Table 9.4-201 (Heat specification)	Revised table to update site-specific HVAC capacities for new plant layout.	UTR R0 10/2012
FSAR Section 9.5 and 9A	Figures 9.5.1-202, 9A-201	Revised figures to comply with the new plant layout and seismic methodology.	UTR R1 02/2013
FSAR Section 12.3	Figure 12.3-1R,12.3-201	Revise figure to incorporate new plant layout.	UTR R0 10/2012
FSAR Section 13.6	Section text as needed	Editorial update to FSAR Section 13.6 as appropriate due to Part 8 update.	UTR R1 02/2013

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
FSAR Section 19.1	Section text and tables as needed	Revise other external event PRA to be consistent with other FSAR chapters (if necessary)	UTR R0 10/2012
	C	OLA Part 3, Environmental Report	
ER Section 2.1	Figure 2.1-1	Revise text, tables and figures to reflect common foundation and the new plant layout.	ER UTR R0 11/2012
ER Section 2.3	Figures 2.3-26 and 2.3-27	Revise text, tables and figures to reflect common foundation and the new plant layout.	ER UTR R0 11/2012
ER Section 2.7	Section 2.7.3 and 2.7.4 text and tables	No changes are expected to the X/Q however the location of the source will change.	ER UTR R0 11/2012
ER Section 3.1	Figure 3.1-1	Revise text, tables and figures to reflect common foundation and the new plant layout.	ER UTR R0 11/2012
ER Section 3.4	Figure 3.4-3	Revise text, tables and figures to reflect common foundation and the new plant layout.	ER UTR R0 11/2012
ER Section 4.1	Figure 4.1-1	Revise text, tables and figures to reflect common foundation and the new plant layout.	ER UTR R0 11/2012
ER Section 5.4	Table 5.4-1, 5.4-3	Revise tables due to source or receptor locations change if needed.	ER UTR R0 11/2012

COLA Part and Section	Summary of Affected Contents of R-COLA	Summary of Planned Revisions to Content	UTR Submittal to NRC
ER Section 6.3	Figure 6.3-1	Revise text, tables and figures to reflect common foundation and the new plant layout.	ER UTR R0 11/2012
	с	OLA Part 8, Physical Security Plan	
Part 8	Security Plan and HAE	Update HAE to reflect updated plant layout and response to RAI 234	Separate Letter 10/2012