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CPSES-200701005
Log # TXNB-07005

May 30, 2007

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

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 3 AND 4
AND MITSUBISHI NUCLEAR ENERGY SYSTEMS, INC.
RESPONSE TO RIS 2007-08 RE UPDATED LICENSING
SUBMITTAL INFORMATION TO SUPPORT THE DESIGN-
CENTERED LICENSING REVIEW APPROACH
PROJECT NOS. 0751 and 0754**

REF: NRC Regulatory Issue Summary (RIS) 2007-08 dated April 16, 2007

The U.S. Nuclear Regulatory Commission (NRC) issued the referenced regulatory issue summary (RIS) to obtain updated information regarding the scheduling of an Early Site Permit (ESP), Combined License (COL), and Design Certification (DC) application submissions, and the extent to which they will support the NRC's design-centered review approach (DCRA). If an addressee chooses to provide a voluntary response, the NRC is interested in obtaining the requested information within 45 days of the date of the RIS.

TXU Power is submitting the following response on behalf of itself and Mitsubishi Nuclear Energy Systems, Inc. (MNES). MNES is planning to submit a design certification application for the US-APWR by the end of this year, and TXU Power is planning to submit a COL application referencing the design certification application for the US-APWR.

Licensing Submittal Information

1. a) Will the applicants be organized into DCWGs [Design Centered Working Groups]?

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Response: Yes. TXU Power is currently the only announced applicant for the US-APWR design and TXU Power is a member of the US-APWR DCWG.

b) If so, what is the membership and who is the single point of contact designated for each DCWG?

Response: TXU Power and MNES are the current members and the single point of contact is Denny Buschbaum (254-897-5851, dbuschb1@txu.com) of TXU Power.

c) Have protocols been developed to provide coordinated responses for RAIs [Requests for Additional Information] with generic applicability to a design center?

Response: Because TXU Power is currently the only announced COL Applicant for the US-APWR, no protocols for responding to RAIs have been established or are needed at this time. TXU Power is working with MNES to coordinate responses to RAIs with the potential to impact both the US-APWR design certification and the Comanche Peak Steam Electric Station Units 3 and 4 (CPSES 3&4) COLA (COL Application) development and review. When other clients select the MNES US-APWR, TXU will ensure protocols are developed to provide coordinated responses for RAIs with generic application.

2. Which applicant referencing the design will be designated as the R-COL (Reference COL) applicant?

Response: The CPSES 3&4 COLA is the US-APWR R-COL.

3. a) When (month and year) will each of the COL applications be submitted for review?

Response: The COLA for CPSES 3&4 is currently planned to be submitted for NRC review in July, 2008.

b) In addition, what is the design, site location, and the number of units at each site?

Response: CPSES 3&4 are two US-APWR units to be located on the same site as Comanche Peak Steam Electric Station Units 1 and 2, about 35 miles southwest of Fort Worth, Texas.

4. What portions of the COL application (chapters, sections, subsections) will be relying on the DC?

Response: As described in the "Discussion" (Section B) portion of Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)" and consistent with the philosophy and intent of the DCWG, we expect that the COL application for CPSES 3&4 will rely heavily on the Design certification documentation prepared for the US-APWR, including but not limited to the following:

- Every chapter of the COL application FSAR, including the plant-specific Technical Specifications, will rely on the US-APWR design certification document (DCD) and will be supplemented as necessary to address additional required information such as COL information items.
- The COL application Environmental Report (ER) will also rely on US-APWR DCD information such as the design descriptions and the discussion of severe accident mitigation design alternatives (SAMDA).
- The COL application will also rely on the standard Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) developed for the US-APWR Design Certification, as we develop the final site-specific ITAAC tables for the CPSES 3&4 Project.

The CPSES project team expects to develop a COLA that is fully compliant with the guidance of NRC Regulatory Guide 1.206. We expect that the integration of information established in the US-APWR Design Certification process, then referenced in the CPSES 3&4 COL application, will provide efficiency benefits to both NRC and TXU.

5. What portions of the R-COL application (chapters, sections, subsections) will be referenced (i.e., replicated verbatim) in S-COL [subsequent COL] applications, and what portions of the application are likely to be site-specific?

Response: No S-COLs have been identified at this time; however, the CPSES 3&4 R-COL is currently being written, to the extent reasonable, to maximize the standardization of COLA material that may be referenced (i.e., replicated verbatim) in S-COL applications.

6. a) When (month and year) will applicants complete the detailed design information to be verified under those inspections, tests, analyses, and acceptance criteria that are directed at certification information (design acceptance criteria)?

Response: A firm date has not as yet been established for completion of the detailed design information necessary for the NRC staff to review the ITAAC related to the closure of design acceptance criteria.

b) Will this information be completed in a design certification amendment application, in the R-COL application, in S-COL applications, in post-COL Final Safety Analysis Report updates, or a combination thereof?

Response: The approach or approaches to be used to complete this detailed design information have not yet been established.

Site and Environmental Information

7. a) Do any applicants intend to apply for an ESP prior to submitting their COL applications?

Response: TXU Power does not intend to apply for an ESP for CPSES 3&4.

b) If so, when (month and year) would the proposed ESP be submitted to the NRC for review?

Response: NA

8. For ESP applicants, is the applicant going to be seeking approval of either "proposed major features of the emergency plans" per 10 CFR 52.17(b)(2)(i), or "proposed complete and integrated emergency plans" per 10 CFR 52.17(b)(2)(ii)?

Response: NA

9. Do the applicants plan to submit an environmental report or limited work authorization request prior to other portions of the COL application, and if so, when (month and year)?

Response: TXU Power intends to submit an environmental report (ER) prior to the submittal of the COLA for CPSES 3&4 assuming that our current target for completion of the ER results in a high quality document suitable for early submission and NRC Staff review; however, as of this time, the baseline schedule for its preparation is still under review. The CPSES 3&4 project team is examining whether to submit a request for a limited work authorization (LWA) but no specific plans have been developed at this time.

10. What scope and schedule do applicants project for site characterization activities, such as core borings and testing of core samples?

Response: All the projected core borings for CPSES 3&4 have been completed and the results are being evaluated. Meteorologic data is being gathered from the CPSES Units 1 and 2 meteorological towers and instrumentation. Ground water monitoring wells have been completed and data is being collected.

11. What interactions have taken place with local and State authorities and other Federal agencies to support licensing new reactors?

Response: Thus far, interactions with local and State authorities and other federal agencies have been focused on water rights, right-of-ways, electrical grid studies, and mineral rights. Interactions with the following authorities have occurred:

- Letters to Texas Parks and Wildlife Department and U.S. Fish and Wildlife Service- verification of threatened and endangered species list, and any additional information available for the CPSES vicinity.
- Letters to thirteen tribal groups inviting comments on proposed action and a commitment to share information if found to be relevant to tribal interests.
- Meeting with Somervell and Hood County Judges, Hood County Fire Marshall, Texas Department of Emergency Management, Texas Department of Health Services, Texas Department of Public Safety, and Texas Department of Transportation.
- Community Environmental Advisory Panel meetings which include interaction with local officials and general public on CPSES environmental program/goals, to champion local environmental initiatives and to discuss the status of Units 3 and 4.
- Letter to Texas Historical Commission to determine if a Phase I cultural resources survey will be needed to update the original survey performed in 1974.
- Numerous meetings and conference calls with the Brazos River Authority (BRA) relating to water appropriations for CPSES Units 3 & 4.
- Meeting with the Texas Commission on Environmental Quality (TCEQ) to review projects specifics and discuss various related environmental aspects of CPSES Units 3 & 4.
- A stakeholder meeting with the Lake Granbury Water Shed Protection Steering Committee which interaction with BRA, TCEQ, State Legislators (Senator Kip Averitt, mostly), Hood County Mayor, County Commissioners, EPA, and Texas Parks & Wildlife Department. The purpose of the committee is to develop and

implement a plan for addressing Lake Granbury water quality issues. Lake Granbury is the planned water source for Units 3 and 4.

In addition, the following interactions are planned:

- Planned meeting with the U.S. Army Corps of Engineers to review project specifics and discuss general aspects relative to intake/discharge structures, jurisdictional determinations, and the permit processes.
- Planned meeting with Texas Parks and Wildlife Department to discuss project specifics and aspects relative to threatened and endangered species in the vicinity of CPSES.
- Planned meetings with local BRA officials to discuss and provide status of Units 3 and 4.

Plant Construction Requirements Information

12. a) Who are the vendors and consultants that are assisting in the preparation of the application?

Response: MNES is the lead vendor and its primary sub-contractors are , Mitsubishi Heavy Industries, Ltd.'s (MHI), Enercon Services, Inc., and Washington Group International, Inc.

- b) The NRC requests that the potential applicants submit a list of entities that are providing input to and are preparing the COL application under a QA program.

Response: The entities identified thus far that will be providing input to and are preparing the COL under a QA program are MNES, MHI, Enercon Services and Washington Group International.

13. a) What information do the applicants have regarding the timing of construction, the ordering of long lead time components, and other commitments to construction?

Response: The CPSES 3&4 project team is working on a schedule to address these important milestones. Firm schedules have not been established. Our objective is to qualify for the production tax credits by meeting the specified milestones.

- b) Furthermore, what vendors will be designing, manufacturing, fabricating, and testing safety-related components for eventual plant construction?

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Response: A complete list of such vendors has not been established at this time; however, it should be noted that MHI has broad manufacturing, fabrication, and testing capabilities which are expected to be relied upon heavily by the CPSES 3&4 project.

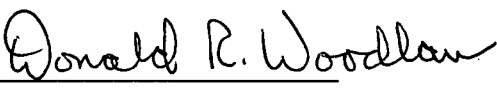
TXU Power will provide updates on this information to the NRC as the updates become available. Should you have any questions about this letter or matters relating more generally to TXU Power's NuBuild program, please contact Don Woodlan (254-897-6887, dwoodla1@txu.com), Denny Buschbaum (254-897-5851, dbuschb1@txu.com) or me.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
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Mitch Lucas

By: 
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DRW
Attachment

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