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Ref. # 10CFR50.54
10CFR50.54(q)

CP-200700023
Log # TXX-07150

October 25, 2007

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 -
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
REQUEST FOR REVIEW AND APPROVAL OF THE REVISED EMERGENCY PLAN
(TAC NOS. MD6063 AND MD6064)

REFERENCE: 1. TXU Power letter, logged TXX-07102, from Mike Blevins to the U.S. Nuclear
Regulatory Commission, dated July 13, 2007
2. Letter from Balwant K. Singal (U. S. NRC) to TXU Power, "Request For Additional
Information Regarding Request For Review And Approval Of The Revised
Emergency Plan (TAC Nos. MD6063 and MD6064)" dated September 27, 2007

Dear Sir or Madam:

By means of the attachments to this letter, Luminant Generation Company LLC (Luminant Power, previously known as TXU Power) hereby provides licensee responses to the Request for Additional Information that was received from the NRC as Reference 2 above.

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

Should you have any questions, please contact Mr. Bob Kidwell at (254) 897-5310.

AX45

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · South Texas Project · Wolf Creek

NRR

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

Executed on October 25, 2007.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

By: 
Fred W. Madden
Director, Oversight & Regulatory Affairs

- Attachments - 1. Comanche Peak Response To Request For Additional Information
2. FEMA Endorsement

RJK

c - E. E. Collins, Region IV
B. K. Singal, NRR
D. A. Johnson, NSIR
Resident Inspectors, Comanche Peak
Region IV, DRS, Senior Emergency Preparedness Inspector

Mrs. Alice Rogers
Environmental & Consumer Safety Section
Texas Department of State Health Services
1100 West 49th Street
Austin, Texas 78756-3189

Attachment 1 to TXX-07150

COMANCHE PEAK RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

- 1. Have the proposed changes been approved by the Federal Emergency Management Agency? Please provide evidence of their concurrence.**

While the Federal Emergency Management Agency (FEMA) has not formally approved the proposed change of Reference 1, it has reviewed and endorsed the 10 Mile Emergency Response Zone (EPZ) change. This endorsement also concluded that the change is consistent with planning standards established in FEMA REP-1/NUREG-0654.

An email providing evidence of this endorsement is provided as Attachment 2 to this letter.

- 2. Explain why the description of "Granbury South of Pearl Street" provided in Section 1.2 of the submittal, would be used in Emergency Plan Implementing Procedures (EPIPs), but is not part of the proposed changes to your EP. Alternately, document that these EPIPs will be reviewed via Title 10 of the Code of Federal Regulations (10 CFR), Part 50.54(q) for future revisions.**

All Emergency Plan Implementing Procedures (EPIPs) are procedurally required at Comanche Peak to be assessed under 10CFR50.54(q) for a decrease in the effectiveness of the site Emergency Plan. Any change thereby identified as a potential decrease in effectiveness will be submitted to the NRC for preapproval prior to implementation per 10CFR50.54(q).

- 3. Elaborate as to how you intend to deal with shadow evacuations when evacuating parts of Granbury.**

Any shadow evacuations resulting from this change in the Granbury zone should present inconsequential effects on the overall emergency response effort. Since the evacuation and relocation plan in effect today already considers all of the City of Granbury in evacuation planning, the reception centers are appropriately sized, trained, and equipped to process this population.

The proposed change creates no potential shadow evacuation population that has not been considered and accounted for in the planning for the Comanche Peak 10 Mile EPZ.

- 4. Explain how this proposed change would affect your Alert and Notification System.**

The proposed change will have no effect on the current Comanche Peak Alert and Notification System (ANS). All of the sirens located within the portion of the City of Granbury that is to be removed from the present 10 Mile EPZ provide coverage to portions of zones that will remain included in the proposed EPZ. In addition, Hood County and the City of Granbury each use the ANS for warning of severe weather, as well as providing warning in the event of a declared emergency at Comanche Peak. Therefore, these sirens will not be relocated or removed from their present location and will remain a credited part of the Comanche Peak Alert and Notification System.

Attachment 2 to TXX-07150

FEMA ENDORSEMENT

From: Hammond, Lisa [mailto:lisa.hammond@dhs.gov]
Sent: Thursday, October 04, 2007 3:17 PM
To: Barham, David
Cc: Flowerday, Scott; Hammond, Lisa
Subject: FW: EPZ Response - Comanche Peak

The proposed Comanche Peak Emergency Plan revision to change the existing northern boundary of the Emergency Planning Zone (EPZ) for the City of Granbury has been reviewed by the Radiological Emergency Preparedness (REP) staff here in FEMA Region VI. Based on the review of the proposed change we support the proposed change for the following reasons:

1. The City of Granbury is experiencing a significant amount of growth (to the northeast) that is extending the current boundary well beyond 10 miles. Establishment of the boundary at a fixed geographical standard is preferable from an emergency planning perspective in that it provides a boundary that is more consistent with the established planning standard and provides for consistency in planning over time.
2. The current Joint Information Center for Comanche Peak is located within the current EPZ inside the City limits of Granbury. Under the current plans and procedures this may require relocation of the Joint Information Center to a location outside of the EPZ to allow for media response without requiring monitoring and dosimetry. At its current location the JIC is physically located outside of the 10 mile boundary and would be outside of the EPZ boundary in the proposed revision.
3. The County Emergency Operations Center is currently located within the EPZ but will be located outside of the EPZ boundary in the proposed revision.
4. The Texas Department of State Health Services Staging Area is currently located within the EPZ but will be located outside of the EPZ boundary in the proposed revision.
5. The change will provide for a fixed geographic boundary for the alert notification system.
6. The change is consistent with planning standards established in FEMA REP-1/NUREG-0654.

It is also my understanding that this proposed change has been reviewed and concurred in by the City of Granbury, Hood County, and the Texas Department of State Health Services.

Lisa Hammond
RAC Chair, TS Branch
National Preparedness Division
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