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Ref. # 10 CFR 50.54(f)

April 10, 2008

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, DOCKET NOS. 50-445 AND 50-446, THREE MONTH RESPONSE TO NRC GENERIC LETTER 2008-01, "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS"

REFERENCE: 1. NRC Generic Letter 2008-01 "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" dated January 11, 2008

Dear Sir or Madam:

The U. S. Nuclear Regulatory Commission (NRC) issued NRC Generic Letter (GL) 2008-01 (Reference 1) to request that each licensee evaluate its Emergency Core Cooling System (ECCS), Residual Heat Removal (RHR) system, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within 9 months of the date of the GL to provide the following information:

- "(a) A description of the results of evaluations that were performed pursuant to the above requested actions. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule."

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Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee shall provide a response within 3 months of the date of the GL. In the 3 month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

Luminant Generation Company, LLC (Luminant Power) will provide the information requested by the GL within the nine months of the date of the GL, contingent on a laser scan method (with insulation on) providing sufficient accuracy of the as-built piping details. If this method does not provide sufficient accuracy then Luminant Power cannot provide the requested information by the requested response date. In accordance with the GL, Luminant Power will submit a response within 9 months of the date of the GL either providing the requested information or providing confirmation that the alternative course of action described in the attachment is required.

Therefore, the attachment to this letter contains the Luminant Power 3 month response to the Requested Information in NRC GL 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" dated January 11, 2008.

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

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

Executed on April 10, 2008.

Should you have any questions, please contact Mr. Carl Corbin at (254) 897-0121.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

By: 

M. L. Lucas
Vice President Nuclear Engineering &
Support

Attachment - Luminant Power 3 Month Response to Generic Letter (GL) 2008-01

c - E. E. Collins, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak Steam Electric Station

Luminant Power 3 Month Response to Generic Letter (GL) 2008-01

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" dated January 11, 2008, addresses the 3 month response requested in NRC GL 2008-01. This response discusses: 1) the required evaluations that may not be complete by October 11, 2008 (9 months from the date of GL 2008-01), 2) the alternative course of action planned in the event the actions required are not complete by October 11, 2008, and 3) the basis for the acceptability of the alternative course of action.

The Requested Information in GL 2008-01 includes "A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations;...." The requested description of all corrective actions pertaining to plant modifications would require the completion of a thorough physical walkdown of the system piping to confirm such things as adequate vent capability for system high points and that the design drawings reflect the as-built piping. Luminant Power will utilize laser scanning without removal of insulation to verify the as-built piping details described above. Luminant Power has confidence that laser scans of the affected piping with the insulation on will provide sufficient accuracy for the as-built piping to complete evaluations required by GL-2008-01. Removal of the insulation would result in significant radiological exposure. In the event that laser scanning with the insulation installed does not provide sufficient accuracy, the requested information pertaining to the required evaluations will not be complete by October 11, 2008, due to the inability to finish the required system walkdowns. The system walkdowns would not be completed due to the following reasons:

- The requirement to erect scaffolding,
- The restrictions on removal of insulation from piping,
- Entry into high radiation areas, and
- Prolonged containment entries during power operation.

If insulation removal is required, the system walkdowns will not be complete until the refueling outage in the fall of 2008 for Unit 1 and the refueling outage in the fall of 2009 for Unit 2. The walkdowns would need to occur during the refueling outage to limit ALARA concerns. Also, in many cases removal of insulation at power would cause excess heat loads and equipment qualification concerns. If insulation removal is required, a final response containing the GL requested information will be submitted by January 31, 2009, for Unit 1 and by January 31, 2010, for Unit 2. If insulation removal is not required a response containing the requested information will be submitted by October 11, 2008.

Based on the adequacy of the current design basis (previous drawing reviews and/or design basis verifications), plant specific operational experience, and the results of previous system inspections, Luminant Power believes that subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.