



**Luminant**

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CP-200800901  
Log # TXX-08095

Ref. # GL 2004-02

August 28, 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  
SUPPLEMENT TO RESPONSE TO NRC GENERIC LETTER (GL) 2004-02, "POTENTIAL  
IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY RECIRCULATION DURING  
DESIGN BASIS ACCIDENTS AT PRESSURIZED-WATER REACTORS"

- REFERENCE:**
1. Letter Logged TXX-05047 from M. Blevins to the NRC dated March 7, 2005, providing a 90-day response to NRC Generic Letter 2004-02. (ML050740365)
  2. Letter Logged TXX-05162 from M. Blevins to the NRC dated September 1, 2005, providing a response to requested information part 2 of NRC Generic Letter 2004-02. (ML052550052)
  3. Letter dated November 8, 2007, from William H. Ruland, Director, Division of Safety Systems, Office of Nuclear Reactor Regulation to Mr. Anthony R. Pietrangelo, Nuclear Energy Institute (NEI) regarding, Plant-Specific requests for extension of time to complete one or more corrective actions for Generic Letter (GL) 2004-02. (ML073060581)
  4. Letter Logged TXX-03130 from C. L. Terry to the NRC dated August 8, 2003, providing a response to NRC BULLETIN 2003-01. (ML032270437)
  5. Letter Logged TXX-07164 from M. Blevins to the NRC dated December 3, 2007, providing a supplemental response to NRC Generic Letter (GL) 2004-02. (ML073450888)
  6. Letter Logged TXX-08033 from M. Blevins to the NRC dated February 29, 2008, providing a supplemental response to NRC Generic Letter (GL) 2004-02. (ML080660596)

Dear Sir or Madam:

Luminant Generation Company LLC (Luminant Power) has completed all required corrective actions in support of resolution of Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2004-02.

All required design modifications and testing have been completed.

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

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

1114  
NRC

Luminant Power has also completed the analysis of the susceptibility of the Emergency Core Cooling System (ECCS) and Containment Spray System (CSS) recirculation functions for Comanche Peak Units 1 and 2. The methodology used conforms to the intent of NEI 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology." The ECCS and CSS recirculation functions under debris loading conditions have been demonstrated by a combination of analysis and testing which provide the basis to show compliance with the applicable regulatory requirements including 10 CFR 50.46 and 10 CFR 50 Appendix A, General Design Criteria 35 and 38.

This letter documents completion of the two remaining licensing commitments regarding GL 2004-02 for Comanche Peak Units 1 and 2.

Description of Commitment

27330  
(completed)

In response to the request for information in Part 1 of Generic Letter 2004-02, CPNPP has substantially completed an analysis of the susceptibility of the ECCS and CSS recirculation functions for CPNPP Units 1 and 2. The methodology used will conform to the intent of NEI 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology." The analyses when fully completed will provide the basis to show compliance with the applicable regulatory requirements including 10 CFR 50.46 and 10 CFR 50 Appendix A, General Design Criteria 35 and 38. The final analysis is scheduled to be completed by August 31, 2008.

27369  
(completed)

The Emergency Core Cooling System (ECCS) and Containment Spray System (CSS) recirculation functions under debris loading conditions at Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2 will be in compliance with the regulatory requirements listed in the Applicable Regulatory Requirements section of Generic Letter 2004-02 by August 31, 2008.

Luminant Power will update engineering report ER-ESP-001, "Generic Letter 2004-02 Supplemental Response (Luminant Power's Update to the Modifications and Maintenance Actions for Resolution of GL 2004-02)" provided in reference 6 by November 26, 2008.

This letter contains the following new licensing commitments regarding Comanche Peak Units 1 and 2.

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Luminant Power will update engineering report ER-ESP-001, "Generic Letter 2004-02 Supplemental Response (Luminant Power's Update to the Modifications and Maintenance Actions for Resolution of GL 2004-02)" provided in reference 6 by November 26, 2008.

Should you have any questions, please contact Mr. J. D. Seawright at (254) 897-0140.

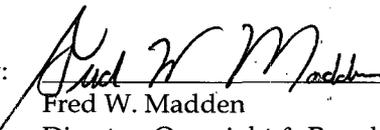
I state under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2008.

Sincerely,

Luminant Generation Company LLC

Mike Blevins

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

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