Michael Takacs

From: Stephen Monarque
Sent: Wednesday, October 29, 2008 11:12 AM
To: Michael Takacs; Donald.Woodlan@luminant.com; John.Conly@luminant.com
Subject: 3 additional issues for Comanche Peak COLA - FSAR 2.5

Don / John,

During the call on Monday morning, the staff discussed these three issues. We did not send them out with the first email, but we are now providing them. Please provide a response to these issues along with the other seismic and geotechnical issues.

The applicant mentioned in Section 2.5.4.5.4 of the FSAR that concrete fill may be used as backfill to replace unsuitable rock removed below elevation 782ft. as part of foundation preparations. However, the applicant did not provide any details regarding the properties of the concrete, such as compressive strength parameters or the concrete standard to be used. **(RG1.206 C.I.2.5.4.5 *Excavations and Backfill*)**

10 CFR 100.23 requires that the applicant properly characterize the site subsurface. The applicant indicates that karst formations exist at the site, and refers to a petrographic analysis that describes the extent of the karst, but has not provided that analysis, or the geotechnical boring logs, with the application. As submitted, the application does not provide sufficient information on potential dissolution of the karst, or justify the applicant's decision to not grout the karst.

Engineered backfill is planned to be placed adjacent to Category I structures. Calculations of critical parameters assume certain properties for the backfill. However, the applicant did not provide a description of the sources and quantities of backfill **(RG 1.206 C.I.2.5.4.5 *Excavations and Backfill*)**, or a description of tests and acceptance criteria to demonstrate that the installed backfill meets the parameters assumed in the calculations.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544