Rafael Flores
Senior Vice President &
Chief Nuclear Officer
rafael.flores@luminant.com

Luminant Power
P O Box 1002
6322 North FM 56
Glen Rose, TX 76043

T 254.897.5590
F 254.897.6652
C 817.559.0403

CP-200900640   Ref. #   10 CFR 52
Log # TXNB-09014

April 24, 2009

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 NUCLEAR POWER PLANT, UNITS 3 AND 4
               DOCKET NUMBERS 52-034 AND 52-035
               MITIGATIVE MEASURES EVALUATION

REFERENCE: Letter, Y. Ogata to NRC Document Control Desk, "Submittal of Mitigative Measures
             Evaluation for the US-APWR," UAP-HF-08261 dated November 14, 2008

Dear Sir:

Luminant Generation Company LLC (Luminant) hereby incorporates by reference Mitsubishi Heavy
Industries (MHI) "Mitigative Measures Evaluation for the US-APWR" as part of the Combined License
Application (COLA) for Comanche Peak Nuclear Power Plant Units 3 and 4 (CPNPP 3 and 4). The
report, submitted to the NRC with the letter referenced above, identifies design enhancements that will
be implemented for the US-APWR standard plant and reference plant designs to assist in the event that
a large area of the facility is lost due to fires or explosions.

The US-APWR Mitigative Measures Evaluation (MME) report addresses strategies identified for
containment and mitigation of large area fires for the US-APWR and specifically for the reference
COLA units at CPNPP. The report was developed by a multi-discipline team that included the B.5.b.
team from the CPNPP 1 and 2 operating units (Operations, Emergency Planning, Security, Engineering,
etc.), industry experts, and MHI. Evaluation of the MME strategies that were based on experience from
the operating units, lessons learned from the industry, MHI-specific design input, and input from
industry consultants, resulted in 13 design enhancements that have been incorporated into the US-
APWR standard design.

Luminant is currently developing a site-specific description and plan for implementation in accordance
with 10 CFR 52.80(d) requirements and will submit an update by May 26, 2009 or soon thereafter.
Should you have any questions about Luminant's actions regarding this issue, or matters relating more
generally to Luminant's nuclear generation development program, please contact Don Woodlan
(254-897-6887, Donald.Woodlan@luminant.com) or me.

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

Executed on April 24, 2009.

<div align="right">

Sincerely,

Luminant Generation Company LLC

[signature]

for   Rafael Flores

</div>

c-   Stephen R. Monarque, NRC Project Manager

Email Distribution

mike.blevins@luminant.com
Brett.Wiggs@luminant.com
Rafael.Flores@luminant.com
mlucas3@luminant.com
jeff.simmons@energyfutureholdings.com
Bill.Moore@luminant.com
Brock.Degeyter@energyfutureholdings.com
rbird1@luminant.com
Matthew.Weeks@luminant.com
Timothy.Clouser@luminant.com
Richard.Brabec@luminant.com
David.Volkening@luminant.com
Ronald.Carver@luminant.com
Bruce.Turner@luminant.com
Eric.Evans@luminant.com
Robert.Reible@luminant.com
donald.woodlan@luminant.com
John.Conly@luminant.com
Jean.Amundson@luminant.com
JCaldwell@luminant.com
David.Beshear@txu.com
Ashley.Monts@luminant.com
Fred.Madden@luminant.com
Dennis.Buschbaum@luminant.com
Carolyn.Cosentino@luminant.com
Allan.Koenig@luminant.com

masahiko_kaneda@mnes-us.com
sherry_bernhoft@mnes-us.com
masanori_onozuka@mnes-us.com
ck_paulson@mnes-us.com
joseph_tapia@mnes-us.com
russell_bywater@mnes-us.com
diane_yeager@mnes-us.com
kazuya_hayashi@mnes-us.com
mutsumi_ishida@mnes-us.com
rjb@nei.org
kak@nei.org
cp34update@certrec.com
michael.takacs@nrc.gov
michael.johnson@nrc.gov
David.Matthews@nrc.gov
Balwant.Singal@nrc.gov
Michael.Norato@nrc.gov
Stephen.Monarque@nrc.gov
jeff.ciocco@nrc.gov
michael.willingham@nrc.gov
john.kramer@nrc.gov
Brian.Tindell@nrc.gov
Elmo.Collins@nrc.gov
Loren.Plisco@nrc.com
Laura.Goldin@nrc.gov
James.Biggins@nrc.gov
sfrantz@morganlewis.com
tmatthews@morganlewis.com