

THE ATTACHMENT AND ENCLOSURE TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION -  
WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390



**Luminant**

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10 CFR 2.390

May 22, 2009

U. S. Nuclear Regulatory Commission  
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 STRATEGIES REPORT**

Dear Sir:

Luminant Generation Company LLC (Luminant) hereby submits the enclosed site-specific Mitigative Strategies Report in accordance with and satisfying the requirements of 10 CFR 52.80(d) identifying the strategies Comanche Peak Nuclear Power Plant Units 3 and 4 will implement in the unlikely event that a large area of the facility is lost due to fires or explosions.

10 CFR 52.80(d) requires a Combined License applicant to submit a description and plans for implementation of the guidance and strategies intended to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities under the circumstances associated with the loss of large areas of the plant due to explosions or fire as required by 10 CFR 50.54(hh)(2). The enclosed report was prepared using the guidance of NUREG-0800 Subsection 13.6.5 and NEI 06-12, "B.5.b Phase 2 and 3 Submittal Guideline," Rev. 2, submitted by NEI to the NRC on May 1, 2009 with a request for endorsement.

The attachment to this letter and the enclosed report are classified as "Security-Related Information" to be withheld from public disclosure under 10 CFR 2.390. Upon removal of the attachment and the enclosed report, this submittal letter is unclassified.

This letter contains the regulatory commitments identified in the attachment.

Should you have any questions regarding this report 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.

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

Executed on May 22, 2009.

Sincerely,

Luminant Generation Company LLC

  
for Rafael Flores

Attachment: Regulatory Commitments in this Letter [Security-Related Information]  
Enclosure: Mitigative Strategies Report for Comanche Peak Units 3 & 4 in Accordance with  
10 CFR 50.54(hh)(2), Rev. 0 [Security-Related Information]

c- Stephen Monarque w/enclosure  
Bill Moore w/enclosure  
Brock Degeyter w/enclosure  
Steve Frantz w/enclosure  
Tim Matthews w/enclosure  
James Biggins w/enclosure  
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