

PLAN FOR COMANCHE PEAK 3 & 4 COLA REVISION 1

August 27, 2009

Purpose

- Define relationship between UTRs and COLA Rev 1
- Describe plan for incorporating changes into COLA Rev 1
- Provide COLA Rev 1 schedule consistent with DCD Rev 2 schedule



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Concept of Update Tracking Reports

- Luminant has been submitting UTRs often to keep NRC current with changes as they occurred:
 - ✓ 3 FSAR UTRs: 4/28, 5/14, 7/24
 - ✓ 4 ER UTRs: 4/16, 4/28, 5/14, 7/24
- Three more UTRs expected to be submitted by October
- Table of changes for each chapter with reason for each change
- COLA Rev 1 will just be a roll-up of all the changes the NRC has already seen in UTRs and RAI Responses



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UTR Pages vs. COL Rev 1 Pages

- UTRs provide “marked-up” COLA pages so NRC can see what was deleted and what was added
 - ✓ Reason for each change is identified in UTR
 - ✓ Right Margin Notation (RMN) identifies changes
 - ✓ Last UTR includes integrated list of changes
- COLA Rev 1 presents same information in “changes accepted” mode
 - ✓ No strike-outs; no inserts; all changes barred

Right Margin Notation (RMN)

All changes in UTRs have RMN, Examples:

- DCD_09.01-10 DCD RAI, Section 09.01,
Question 10
- MAP-05-02 DCD internal item
- RCOL2_10.02.03-1 COLA RAI (Part 2,
Section 10.2.3, Question 1)
- CTS-00517 COLA internal item

Right Margin Notation (RMN) – cont.

More Examples:

- HYDSV-20 Safety Site Visit Item (Hydro
Site Visit Question 20)
- MET-13 ER Audit information need
- RAI MET 13 ER RAI (Meteorology
Question 13)

Content of COLA Rev 1

- **Changes due to DCD**
- **Changes from NRC interfaces**
- **Other changes**

Changes due to DCD

- **Changes in DCD Rev 2 that impact COLA**
- **DCD RAI responses that impact COLA**
- **MHI commitments to NRC that impact COLA
(including COL items)**

Changes from NRC Interfaces

- **Commitments to NRC in COLA submittal letter**
- **Responses to NRC acceptance review questions**
- **Responses to NRC RAIs**
- **Changes resulting from ER Site Audit and Safety Site Visit discussions**

Other Changes

- **Self-identified items**
- **COLA Tracking System internal items**
- **Changes due to new regulations (e.g. Aircraft and Security Rules)**



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Issuance of COLA Revision 1

- **Final internal review will verify correct change bar format and hyperlink operation**
- **COLA Rev 1 submittal by 11/20/09**
- **Goal - no information in COLA Rev 1 that NRC has not seen in UTRs or RAI responses**



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Summary

- **COLA Rev 1 scheduled to keep R-COLA aligned with DCD**
- **Freeze date – 9/30/09**
- **Submittal date – 11/20/09**
- **COLA Rev 1 preceded by series of UTRs**
- **COLA Rev 1 should not contain any changes NRC has not already seen**
- **Changes in Rev 1 primarily reflect RAI responses, changes in DCD, and discussions from site visits**



Questions or Comments