

PMComanchePekNPEm Resource

From: Monarque, Stephen
Sent: Monday, November 09, 2009 3:51 PM
To: ComanchePeakCOL Resource
Subject: FW: Letter Corrections from Luminant
Attachments: TXNB-09070 Letter corrections.pdf

From: John.Conly@luminant.com [mailto:John.Conly@luminant.com]

Sent: Thursday, November 05, 2009 4:46 PM

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Cc: James.Hill2@luminant.com

Subject: Letter Corrections

Luminant has submitted the attached letter to correct electronic attachment issues with letters TXNB-09055 (October 19, 2009) and TXNB-09056 (October 21, 2009). If there are any questions regarding the submittal, please contact me or contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com).

Thanks,

John Conly
COLA Project Manager NuBuild
Luminant Power
(254) 897-5256

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Email Number: 1219

Mail Envelope Properties (9C2386A0C0BC584684916F7A0482B6CA0588B68475)

Subject: FW: Letter Corrections from Luminant
Sent Date: 11/9/2009 3:50:49 PM
Received Date: 11/9/2009 3:50:52 PM
From: Monarque, Stephen

Created By: Stephen.Monarque@nrc.gov

Recipients:
"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>
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Files	Size	Date & Time
MESSAGE	2440	11/9/2009 3:50:52 PM
TXNB-09070 Letter corrections.pdf		212343

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Return Notification: No
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Sensitivity: Normal
Expiration Date:
Recipients Received:



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CP-200901580
Log # TXNB-09070

Ref. # 10 CFR 52

November 5, 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
CORRECTIONS TO LETTERS SUBMITTED TO THE NRC**

- REFERENCES:**
1. Letter, R. Flores to D. Matthews, "Response to Requests for Additional Information No. 2749, 2751, 2758, 2760, 2795, 2970, 2971, 3033, 3225, 3398, 3401, 3402, 3556, and 3557," dated October 19, 2009 (TXNB-09055)
 2. Letter, R. Flores to D. Matthews, "Combined License Application Update Tracking Report (FSAR #7, ER #5)," dated October 21, 2009 (TXNB-09056)

Dear Sir:

Luminant Generation Company LLC (Luminant) herein submits corrections to the referenced letters. In Reference 1, the response to Request for Additional Information No. 3398 (CP RAI #49) Question 11.02-9 cited an outdated revision of Calculation TXUT-001-ER-5.4-CALC-010, which was also provided electronically with the letter. The corrected response is attached. The only change in the response was made under "Attachment" where "Rev. 0" was changed to "Rev. 1" (see the revision bar in the right margin). The referenced Revision 1 of the calculation is provided on the attached CD.

A draft version of an electronic file (Update Tracking Report ER #5) was inadvertently attached with Reference 2. The correct file is provided on the attached CD.

Should you have any questions regarding these corrections, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

There are no commitments in this letter.

I state under penalty of perjury that the foregoing is true and correct. Executed on November 5, 2009.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

- Attachments
1. Revised Response to Request for Additional Information No. 3398 (CP RAI #49)
Question 11.02-9
 2. Electronic Attachments (on CD)

cc: Stephen Monarque w/all Attachments (on CD)

Electronic Distribution w/ Attachment 1

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Luminant Records Management -
Portfolio of .pdf files

Attachment 1

**Revised Response to Request for Additional Information No. 3398 (CP RAI #49)
Question 11.02-9**

**REVISED RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
(REV. 1)**

Comanche Peak, Units 3 and 4

Luminant Generation Company LLC

Docket Nos. 52-034 and 52-035

RAI NO.: 3398 (CP RAI # 49)

SRP SECTION: 11.02 – Liquid Waste Management System

QUESTIONS for Health Physics Branch (CHPB)

DATE OF RAI ISSUE: 9/7/2009

QUESTION NO.: 11.02-9

Table 11.2-14R of the COLA, Part 2, FSAR (Rev 0) presents site-specific LADTAP II code input parameter values for the site-specific application to calculate doses from liquid effluents for compliance with 10 CFR 50 Appendix I and 40 CFR 190. The NRC staff's review of Section 11.2 indicates additional information is needed for the site-specific parameter values and their basis to support Luminant's conclusions. Because LADTAP II applies effluent release concentrations calculated from a modified version of the PWR-GALE code (DCD RAI 402-3028), the NRC staff is unable to independently confirm Luminant's dose calculations for a reasonable assurance of safety conclusion. Please address the following items.

1. Submit the LADTAP II code input/output files for the site-specific application.
2. Submit the calculation and supporting technical basis documents including references for selecting the site-specific parameter values used in the LADTAP II code calculations.
3. Table 11.2-14R identifies "Cow" as the animal considered in the irrigated foods - milk pathway dose for liquid effluent releases, whereas, Table 11.3-8R identifies both "Cow" and Goat" as animals considered in the milk pathway dose calculations for gaseous effluent releases. Please address this inconsistency.

Revise the COLA to include this information and provide a markup in your response.

ANSWER:

1. The LADTAP II input and output files were submitted in Luminant letter TXNB-09045 dated September 14, 2009.
2. The calculation and supporting technical basis document is attached.

3. Table 11.2-14R has been revised to show both goats and cows.

Impact on R-COLA

See attached marked-up FSAR Draft Revision 1 page 11.2-20.

Impact on S-COLA

None.

Impact on DCD

None.

Attachment

TXUT-001-ER-5.4-CALC-010, Rev. 1

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 2, FSAR**

11.2 LIQUID WASTE MANAGEMENT SYSTEM

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

11.2.1.5 Site-Specific Cost-Benefit Analysis

CP COL 11.2(5) Replace the third paragraph in **DCD Subsection 11.2.1.5** with the following.

A site-specific cost benefit analysis using the guidance of regulatory guide (RG) 1.110 was performed based on the site-specific calculated radiation doses as a result of radioactive liquid effluents during normal operations, including anticipated operational occurrences (AOOs). The result of the dose analysis indicated a public exposure of less than 1 person-rem per year resulting from the discharge of radioactive effluents, effecting a dose cost of less than \$1000 per year, in 1975 dollars. Based on a population dose results of 2.14 person-rem per year (Total Body), 2.04 person-rem per year (Thyroid) and the equipment and operating costs as presented in RG 1.110, the cost benefit analysis demonstrates that addition of processing equipment of reasonable treatment technology is not favorable or cost beneficial, and that the design provided herein complies with Title 10, Code of Federal Regulations (CFR), Part 50, Appendix I.

11.2.1.6 Mobile or Temporary Equipment

CP COL 11.2(1) Add the following text at the end of the paragraph in **DCD Subsection 11.2.1.6**.

Process piping connections ~~are designed to~~ have connectors different from the utility connectors to prevent cross-connection and contamination. The use of mobile or temporary equipment will require Luminant to address applicable regulatory requirements and guidance such as 10 CFR 50.34a, 10 CFR 20.1406 and RG 1.143. As such the purchase or lease contracts for any temporary and mobile equipment will specify the applicable criteria.

The space allocated for the temporary and mobile equipment is located in the Auxiliary Building to minimize the impact to the environment in the event of an accident or spillage of radioactive materials. Shield walls are provided on three sides with one side open for access during installation, operation, inspection, and maintenance. The shield walls also serve to minimize spread of contamination to the entire area. A shield door is provided with truck bay access door from the common walkway inside the A/B. At the door opening a curb with sloped sided is

CTS-00839
RCOL2_11.0
2-1

RCOL2_11.0
2-6

Attachment 2

Electronic Attachments (on CD)

TXUT-001-ER-5.4-CALC-010, Rev. 1 for TXNB-09055 dated October 19, 2009

Environmental Report Update Tracking Report Rev. 5 for TXNB-09056 dated October 21, 2009