



Luminant

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-200901654
Log # TXNB-09076

Ref. # 10 CFR 52
10 CFR 2.390

December 7, 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
SUBMITTAL OF PROPRIETARY CALCULATIONS

REFERENCE: Letter, R. Flores to D. B. Matthews, "Response To Request For Additional Information No. 2879," dated November 24, 2009 (ML093340447)

Dear Sir:

Attachments 3 and 4 of the referenced letter stated that two proprietary calculations would be submitted by a separate letter. Luminant Generation Company LLC (Luminant) herein submits calculations 4DS-CP34-20080048, Rev. 1, and SSI-12-05-100-003, Rev. C, with an affidavit that justifies their classification as proprietary. These calculations provide documentation supporting the response to an NRC request for additional information provided in the referenced letter.

Luminant requests that the NRC withhold Attachments 1 and 2 from public disclosure in accordance with 10 CFR 2.390. This letter is unclassified upon removal of Attachments 1 and 2.

Should you have any questions regarding this submittal, 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 December 7, 2009.

Sincerely,

Luminant Generation Company LLC

Rafael Flores for
Rafael Flores

DO90
NRO

- Enclosure 1. Mitsubishi Heavy Industries, Ltd. Affidavit
Attachments 1. SASSI Model of US-APWR Reactor Building, 4DS-CP34-20080048, Rev.1
2. Site Specific SSI Analysis of US-APWR Reactor Building, SSI-12-05-100-003, Rev. C

cc: Stephen Monarque w/all attachments

Electronic distribution w/o attachments

mike.blevins@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
Allan.Koenig@luminant.com
Timothy.Clouser@luminant.com
Ronald.Carver@luminant.com
David.Volkening@luminant.com
Bruce.Turner@luminant.com
Eric.Evans@luminant.com
Robert.Reible@luminant.com
donald.woodlan@luminant.com
John.Only@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

Luminant Records Management

masahiko_kaneda@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
nan_sirirat@mnes-us.com
masaya_hoshi@mnes-us.com
rjb@nei.org
kak@nei.org
michael.takacs@nrc.gov
cp34update@certrec.com
michael.johnson@nrc.gov
David.Matthews@nrc.gov
Balwant.Singal@nrc.gov
Hossein.Hamzehee@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.Biggin@nrc.gov
Susan.Vrahoretis@nrc.gov
sfrantz@morganlewis.com
tmatthews@morganlewis.com

ENCLOSURE 1

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, state as follows:

1. I am General Manager, APWR Promoting Department, of Mitsubishi Heavy Industries, LTD ("MHI"), and have been delegated the function of reviewing MHI's US-APWR documentation to determine whether it contains information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential and pursuant to 10 C.F.R. § 2.390(d)(1) as Security-Related information.
2. In accordance with my responsibilities, I have reviewed the enclosed documents entitled "SASSI Model of US-APWR Reactor Building (4DS-CP34-20080048 Rev.1)", September 17, 2008 and "Site-Specific SSI Analysis of US-APWR Reactor Building (SSI-12-05-100-003 Rev. C)", December 2, 2009 and have determined that portions of the documents contain proprietary and security-related information that should be withheld from public disclosure.
3. The information identified as proprietary in the enclosed documents has in the past been, and will continue to be, held in confidence by MHI and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
4. The basis for holding the referenced information confidential are as follows:
 - A. They include the know-how and outputs obtained from analyses or designing which required significant cost to MHI. It required the performance of detailed design calculations, supporting analyses and testing extending over several years. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.
 - B. They include the information directly referred from documents or books the copyrights of which are reserved.
 - C. They include the information concerning Luminant's physical protection not otherwise designated as Safeguards Information or classified as National Security Information or Restricted Data.
5. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of information to the NRC staff.
6. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without the costs or risks associated with the design of

new systems and components. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI in the U.S. nuclear plant market.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Executed on this 4th day of December 2009.

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is written in a cursive style with a large initial "Y" and a long horizontal stroke at the end.

Yoshiaki Ogata,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.