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April 12, 2010

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION NO. 4454

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 4454 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. This RAI involves the preservice and inservice inspections in the steam generator program.

Should you have any questions regarding this response, 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 April 12, 2010.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: Response to Request for Additional Information No. 4454 (CP RAI #151)

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MRO

Electronic distribution w/attachment

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Comanche Peak, Units 3 and 4

Luminant Generation Company LLC

Docket Nos. 52-034 and 52-035

RAI NO.: 4454 (CP RAI #151)

SRP SECTION: 013.04 - Operational Programs

QUESTIONS for Component Integrity, Performance, and Testing Branch 1 (AP1000/EPR Projects) (CIB1)

DATE OF RAI ISSUE: 3/10/2010

QUESTION NO.: 13.04-4

Please modify STD COL 13.4(1) of the Comanche Peak Units 3 and 4 COL, Part 2 FSAR to clarify that the preservice and inservice parts of the Steam Generator Program are included as operational programs in the application. For example, list FSAR Section 5.4.2.5 under items 1 and 4 in Table 13.4-201 ("Operational Programs Required by NRC Regulation and Program Implementation"). According to NUREG-0800, Standard Review Plan, Section 5.4.2.2, the Steam Generator Program is an operational program that should be fully described, with implementation milestones listed in the appropriate table in Chapter 13 of the FSAR. SRP Section 5.4.2.2 also discusses the need for a steam generator program to ensure all tubes are inspected before being placed into service. Since preservice inspection of steam generator tubes is not described in the technical specifications, it is appropriate to include it in the list of operational programs.

ANSWER:

The Steam Generator Program is fully described in COLA Part 4 Technical Specification (TS) 5.5.9 and DCD Subsection 5.4.2.2, the latter of which references ASME Section XI, NEI 97-06 Revision 2, and the EPRI guidelines specified in NEI 97-06. As noted in DCD Subsection 5.4.2.2.2, SG tube preservice inspection is performed in accordance with ASME Section XI and EPRI PWR SG examination guidelines. FSAR Table 13.4-201 has been revised to specifically address the preservice and inservice inspection program elements applicable to the steam generators (SGs).

Preservice Inspection

Steam generator preservice inspection is performed as required by 10CFR50.55a(g) and ASME Code Section XI, and is therefore addressed as part of the overall preservice inspection program identified in FSAR Table 13.4-201, item 4. ASME Section XI, Subarticle IWB-2200, "Preservice Examination," includes a provision that SG tube examination be governed in accordance with the plant Technical Specifications (TS). TS 3.4.17 requires SG tube integrity to be maintained in Modes 1, 2, 3 and 4, i.e., from hot shutdown (Mode 4) up to and including power operation (Mode 1). The surveillance

requirements associated with TS 3.4.17 are performed as part of the Steam Generator Program (TS 5.5.9), which establishes SG tube inservice inspection requirements commencing with the first refueling outage. TS 3.4.17 applies prior to the first refueling outage and relies on preservice inspection to establish SG tube integrity upon initial entry into Mode 4. As described in DCD Subsection 5.4.2.2.2, preservice inspection of the entire length of each tube in each SG will be performed in accordance with ASME Section XI and EPRI PWR SG examination guidelines. The milestone for preservice inspection of the SG tubes has been identified in FSAR Table 13.4-201 as prior to initial entry into Mode 4.

Inservice Inspection

Steam generator inservice inspection is performed as required by 10CFR50.55a(g) and ASME Code Section XI as part of the overall inservice inspection program identified in FSAR Table 13.4-201, Item 1, which has been revised to include the Steam Generator Program described in FSAR Subsection 5.4.2.2 and TS 5.5.9. As described in FSAR Subsection 5.4.2.2.2 and Table 13.4-201, the implementation milestone for the Steam Generator Program is prior to placing the plant into commercial service.

Impact on R-COLA

See attached marked-up FSAR Revision 1 pages 13.4-2 and 13.4-3.

Impact on S-COLA

None.

Impact on DCD

None.

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

STD COL 13.4(1)

Table 13.4-201 (Sheet 1 of 9)

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation			
				Milestone	Requirement		
1.	<ul style="list-style-type: none"> Inservice Inspection Program • <u>Primary-to-Secondary Leakage Monitoring Program</u> • <u>Highly Radioactive Fluid Systems Outside Containment Monitoring Program</u> • <u>Steam Generator Program</u> 	10 CFR 50.55a(g)	5.2.4	Prior to Commercial service	10 CFR 50.55a(g)		
			6.1			ASME Section XI IWA 2430(b)	
		10 CFR 50.55a(b)(2)(iii)	5.4.2.2	After steam generator on-line on nuclear heat	License Condition	RCOL_13.04-2	
		10 CFR 50.34.f(2)(xxvi)	Part 4 Technical Specification Subsection 5.5.2	After generator on-line on nuclear heat	License Condition	RCOL_13.04-3	
		10 CFR 50.55a(g)	5.4.2.2	Prior to Commercial service	10 CFR 50.55a(g)	RCOL2_13.04-4	
					ASME Section XI IWA 2430(b)		
					Technical Specification 5.5.9		

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

STD COL 13.4(1)

Table 13.4-201 (Sheet 2 of 9)

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				Milestone	Requirement
2.	Inservice Testing Program	10 CFR 50.55a(f)	3.9.6	After generator on-line on nuclear heat	10 CFR 50.55a(f)
		10 CFR 50, Appendix A	5.2.4		ASME OM Code
		• <u>Primary-to-Secondary Leakage Monitoring Program</u>	<u>10 CFR 50.55a(b)(2)(iii)</u>	<u>5.4.2.2</u>	<u>After steam generator on-line nuclear heat</u>
	• <u>Highly Radioactive Fluid Systems Outside Containment Monitoring Program</u>	<u>10 CFR 50.34.f(2)(xxvi)</u>	<u>Part 4 Technical Specification Subsection 5.5.2</u>	<u>After generator on-line on nuclear heat</u>	<u>License Condition</u>
3.	Environmental Qualification Program	10 CFR 50.49(a)	3.11	Prior to Initial fuel load	License Condition
4.	Preservice Inspection Program	10 CFR 50.55a(g)	5.2.4	Completion prior to initial plant start-up	10 CFR 50.55a(g)
		• <u>Steam Generator Tube Preservice Inspection</u>	<u>10 CFR 50.55a(g)</u>	<u>5.4.2.2</u>	<u>Prior to initial entry into Mode 4, Hot Shutdown</u>
5.	Reactor Vessel Material Surveillance Program	10 CFR 50.60 10 CFR 50, Appendix H	5.3.1	Prior to initial criticality	License Condition

RCOL_13.04
-2

RCOL_13.04
-3

RCOL2_13.0
4-4