

PMComanchePekNPEm Resource

From: Monarque, Stephen
Sent: Monday, April 12, 2010 4:28 PM
To: ComanchePeakCOL Resource
Subject: FW: Submittals to the NRC - non public pending SUNSI review
Attachments: TXNB-10031 Unclassified PSP Change for SCR.pdf; TXNB-10030 RAI 151.pdf

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

Sent: Monday, April 12, 2010 3:19 PM

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Cc: James.Hill2@luminant.com; Neil.Harris@luminant.com; David.Fuller@luminant.com
Subject: Submittals to the NRC

Luminant has submitted the attached letters to the NRC:

TXNB-10030, which submits the response to RAI No. 4454 (CP #151) regarding the steam generator program

TXNB-10031, which describes an UNCLASSIFIED change that will be made to the CPNPP 3 & 4 Physical Security Plan due to re-opening Squaw Creek reservoir to the public.

If there are any questions regarding these letters, please contact me or contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com).

Thanks,

John Conly

Luminant
COLA Project Manager
(254) 897-5256

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Hearing Identifier: ComanchePeak_COL_NonPublic
Email Number: 1528

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Subject: FW: Submittals to the NRC - non public pending SUNSI review
Sent Date: 4/12/2010 4:27:41 PM
Received Date: 4/12/2010 4:27:42 PM
From: Monarque, Stephen

Created By: Stephen.Monarque@nrc.gov

Recipients:
"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	2731	4/12/2010 4:27:42 PM
TXNB-10031 Unclassified PSP Change for SCR.pdf		142472
TXNB-10030 RAI 151.pdf	256750	

Options
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Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:



Luminant

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CP-201000551
Log # TXNB-10031

Ref. # 10 CFR 52

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
UNCLASSIFIED CHANGE TO PHYSICAL SECURITY PLAN DUE TO SQUAW CREEK
RESERVOIR OPENING**

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein a proposed change to the Physical Security Plan (PSP) submitted as Part 8 of the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. This change reflects Luminant's decision to re-open Squaw Creek Reservoir for recreational use by members of the public via controlled access. Although the complete PSP is classified as Safeguards Information, the proposed change addresses only unclassified information. This change will be included in the next formal revision of the PSP.

Should you have any questions regarding this proposed change to the PSP, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

The only commitment in this letter is to include the proposed change in the next formal revision of the PSP. This commitment is being tracked as Item #7381.

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: Proposed Unclassified Change to the Physical Security Plan

Electronic distribution w/ attachment

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Proposed Unclassified Change to the Physical Security Plan

On page 11 of the Physical Security Plan, Section 11.2.3, the current text (in red) reads as follows:

SCR is owned by Luminant and is currently closed to public boat usage. As such, no additional buoys, markers, or other equipment to restrict access is required. (Originally SCR was open to the public and buoys were placed to designate restricted areas.)

That text will be replaced with the following:

Luminant, the owner of SCR, controls surface watercraft via multiple methods. The application of the Emergency Plan in conjunction with the Security Plan is performed as necessary to assure continued security of CPNPP and safety of SCR users.

To assure the continuing security and safety at CPNPP and maintain usability of SCR, the following actions and/or functions are in place:

- Scheduling, marshalling, searching, identifying and communication methods have been established to assist in controlling watercraft access and use of SCR.
- Limitations are placed on the number and types of watercraft on SCR at any given time as well as the time-of-day watercraft are allowed on SCR.
- Use of SCUBA equipment is prohibited except for use during emergency or work related activities or as specified by appropriate CPNPP management.
- Specific areas of SCR have been either buoyed off or other more substantial methods deployed to minimize and/or thwart watercraft from approaching designated restricted areas around CPNPP.
- Local Law Enforcement Agency (LLEA) personnel frequent the SCR to assure compliance with Texas law pertaining to public use of water resources as well as assisting in facility security as a member of LLEA. These personnel have received training associated with the security requirements of CPNPP.

The company retains ownership and control of SCR and as such, may at any time close the reservoir to watercraft or individual use.



Luminant

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CP-201000552
Log # TXNB-10030

Ref. # 10 CFR 52

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)

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)	
			6.6			
		10 CFR 50.55a(b)(2)(iii)	5.4.2.2	<u>After steam generator on-line on nuclear heat</u>	<u>License Condition</u>	RCOL_13.04 -2
		10 CFR 50.34.f(2)(xxvi)	Part 4 Technical Specification Subsection 5.5.2	<u>After generator on-line on nuclear heat</u>	<u>License Condition</u>	RCOL_13.04 -3
		10 CFR 50.55a(g)	5.4.2.2	Prior to Commercial service	10 CFR 50.55a(g)	RCOL2_13.0 4-4
					ASME Section XI IWA 2430(b)	
					<u>Technical Specification 5.5.9</u>	

**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>	10 CFR 50.55a(b)(2)(iii)	5.4.2.2	<u>After steam generator on-line nuclear heat</u>
	• <u>Highly Radioactive Fluid Systems Outside Containment Monitoring Program</u>	10 CFR 50.34.f(2)(xxvi)	<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>	10 CFR 50.55a(g)	5.4.2.2	<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