



**Luminant**

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May 24, 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  
RESCHEDULED REGULATORY COMMITMENTS**

Dear Sir:

Luminant Generation Company LLC (Luminant) herein reschedules the completion dates for some regulatory commitments made in letters submitted to the NRC during the last six months. The revised commitment completion dates and reason for rescheduling are provided in the attached table.

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

I state under penalty of perjury that the foregoing is true and correct.

Executed on May 24, 2010.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: Rescheduled Regulatory Commitments

DOFO  
NRO

Electronic distribution w/attachment

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**ATTACHMENT -  
 RESCHEDULED REGULATORY COMMITMENTS**

<b>Comm #</b>	<b>Source</b>	<b>Commitment</b>	<b>Due Date</b>	<b>Revised Due Date</b>	<b>Reason for Change</b>
6481	TXNB-09048 9/24/09 ML092720676	Plant high confidence of low probability of failure (HCLPF) values for the plant-specific SSCs, such as cooling towers, will be confirmed with a calculation using EPRI TR-103959 methodology after completion of seismic design and stress analysis of the SSCs.	Mid-2010	3/31/2011	The seismic design and stress analysis will not be completed until the end of 2010, followed by the HCLPF calculations by the end of March 2011.
6491	TXNB-09048 9/24/09 ML092720676	When the seismic margin analysis for the design certification is available, we will confirm that the analysis envelopes the plant specific design.	Mid-2010	3/31/2011	The seismic design and stress analysis will not be completed until the end of 2010, followed by the seismic margin analysis by the end of March 2011.
6631	TXNB-09064 11/11/09 ML093200501	With regard to the application of more recent guidance for probabilistic risk assessment – based SMA methodology as applicable to the site-specific features of the COLA, Luminant plans to revise the COLA to incorporate the EPRI TR-1002988, “Seismic Fragility Application Guide” in response to the draft Interim Staff Guidance (ISG-20), which is expected to prescribe detailed items that should be included in the FSAR. EPRI TR-1002989, “Seismic Probabilistic Risk Assessment Implementation Guide” may also be incorporated into the FSAR.	COLA Rev 2	3/31/2011	The seismic design and stress analysis will not be completed until the end of 2010 followed by the seismic margin analysis by the end of March 2011.

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6641	TXNB-09064 11/11/09 ML093200501	Luminant will revise the FSAR to include a description of the site-specific SMA results, including makeup water and seismically-driven common failure mode considerations for the UHS mechanical draft cooling towers in response to ISG-20.	COLA Rev 2	3/31/2011	The seismic design and stress analysis will not be completed until the end of 2010, followed by the seismic margin analysis by the end of March 2011.
6831	TXNB-09073 11/24/09 ML093340447	Because of the large ratio of the standard plant input motion versus the site-specific input motion, the assumptions for the standard plant design of the A/B and T/B were considered to envelope the critical responses of the non-uniform site-specific soil column profiles, and were not validated by performing site-specific SSI analyses. SSI analyses for A/B and T/B in generic standard soil input will be performed by May 2010.	May 2010	1/31/2011	The SSI analysis for seismic category 2 buildings has been rescheduled to be completed by December 31, 2010.
7221	TXNB-10018 3/5/10 ML100700263	Site-specific design considerations for compliance with RG 4.21 will be added in FSAR Chapter 12. This RAI response will be revised to incorporate the changes by the end of May 2010.	May 2010	6/30/2010	MHI received RAI 578 (4483) on April 27, 2010 regarding US-APWR adherence to RG 4.21. In order to maintain continuity between the DCD and the COLA, Luminant is delaying its response until June 30, 2010.

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7231	TXNB-10018 3/5/10 ML100700263	Subsection 12.3.1., "Minimization of Contamination and Radioactive Waste Generation," will be added to the DCD to delineate the design features incorporated into the US-APWR. This section will identify the design features discussed in RG 4.21 and where these features are specifically discussed in the DCD. The changes will be provided in Mitsubishi Heavy Industries, Ltd. letter to the NRC by the end of May 2010.	May 2010	6/30/2010	MHI received RAI 578 (4483) on April 27, 2010 regarding US-APWR adherence to RG 4.21. In order to maintain continuity between the DCD and the COLA, Luminant is delaying its response until June 30, 2010.