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August 9, 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. 4846

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 4846 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAI involves the turbine inspection procedure.

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 August 9, 2010.

Sincerely,

Luminant Generation Company LLC


Rafael Flores

Attachment: Response to Request for Additional Information No. 4846 (CP RAI #169)

DO90
NRO

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Luminant Records Management (.pdf files only)

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.: 4846 (CP RAI #169)

SRP SECTION: 10.02.03 - Turbine Rotor Integrity

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

DATE OF RAI ISSUE: 7/8/2010

QUESTION NO.: 10.02.03-2

Revision 1 of the Comanche Peak COL FSAR revised Section 10.2.3.5 to state that a turbine maintenance and inservice inspection procedure will be established prior to fuel load. However, the description of the inspection program, including the inspection intervals were not provided in this revised COL FSAR Section 10.2.3.5, as requested in the NRC staff's RAI Number 6 (2614). Therefore, Luminant is requested to provide the following information in order to meet the requirements of General Design Criterion 4 of 10 CFR Part 50:

- a) The guidelines in Section C.I.10.2.3.5 of Part I to Regulatory Guide (RG) 1.206 specify that if the plant-specific inspection program is not available at the time of the COL application, the representative information (description of the inspection program and inspection interval) may be submitted for staff review as part of the COL application. Therefore, describe the inservice inspection program and inspection intervals in the COL FSAR, or specify in the COL FSAR that the inspection procedure will be consistent with the inspection program and inspection intervals identified in Section 10.2.3.5 of the US-APWR DCD FSAR.
 - b) The submittal and implementation of the inservice inspection procedure should be included as a proposed license condition in Section 3 to Part 10 of the Comanche Peak COL application since this item will not be resolved prior to the issuance of the license. The proposal of a license condition, as discussed in Section C.I.10.2.3.5 of Part I to RG 1.206, ensures that the as-built plant is consistent with the design reviewed during the licensing process.
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ANSWER:

- a) FSAR Section 10.2 incorporated by reference DCD Tier 2 Section 10.2, which includes a full description of the turbine inspection program. By incorporating this information from the DCD, the FSAR establishes that the inspection procedure will be consistent with the DCD inspection program and inspection interval. FSAR Subsection 10.2.3.5 supplemented the DCD to address COL Item

10.2(1) by adding a statement that the turbine maintenance and inspection procedure will be established prior to fuel load.

The COLA FSAR has been revised to clarify that the procedure will be consistent with the maintenance and inspection program plan activities and inspection intervals identified in DCD Subsection 10.2.3.5.

- b) The turbine inspection program has been added to a license condition in Subsection 3 Specific Proposed License Conditions, Part 10 of the COLA.

Impact on R-COLA

See attached marked-up FSAR Revision 1 page 10.2-1 and Part 10 Revision 1 pages 3, 4 and 6.

Impact on DCD

None.

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

10.2 TURBINE-GENERATOR (T/G)

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

10.2.3.5 Inservice Inspection

STD COL 10.2(1) Replace the last paragraph of DCD Subsection 10.2.3.5 with the following.

A turbine maintenance and inspection procedure will be established prior to fuel load. The procedure will be consistent with the maintenance and inspection program plan activities and inspection intervals identified in DCD Subsection 10.2.3.5.

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2.03-2

10.2.5 Combined License Information

Replace the content of DCD Subsection 10.2.5 with the following.

STD COL 10.2(1) **COL 10.2(1)** *Inservice Inspection*

This Combined License (COL) item is addressed in Subsection 10.2.3.5.

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 10 - ITAAC and Proposed License Conditions**

2.3 Operational Programs

Operational Programs are identified in FSAR Table 13.4-201 and their and Subsection 10.2.3.5. Their implementation by the milestones indicated in the Table is below represents a potential condition to the license. Some of these programs may be adequately controlled by other methods such as the regulations, the technical specifications or a commitment ~~tracking system~~ and will not ~~need to~~ be addressed ~~in~~ as a license condition. ~~A proposed~~ Proposed license conditions ~~is~~ are provided in ~~section~~ Section 3 below based upon the current information in ~~Chapter 13 of the COLA-FSAR~~.

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2.4 Environmental Protection Plan

The Environmental Protection Plan (EPP) and its implementation may also be a potential condition to the license. The EPP has typically been an appendix to the operating license and that precedent may be followed for COLs as well. No plant specific environmental items have been identified which are not adequately controlled by regulations, the appropriate permits, etc. and thus an EPP has not been proposed and is not needed.

2.5 Technical Specifications

Implementation of Technical Specifications prior to fuel load could also constitute a potential condition to the license. The Technical Specifications have typically been an appendix to the operating license and that precedent may be followed for COLs as well.

2.6 Emergency Planning Actions

Execution of Letters of Agreement with State and local entities identifying the specific nature of arrangements in support of emergency preparedness and certifying the agency's concurrence with the emergency action levels prior to the full-participation exercise is a potential condition to the license. A proposed license condition is provided in section 3 below.

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Submittal of a fully developed set of site-specific Emergency Action Levels (EALs) to the NRC in accordance with NEI 99-01, Revision 5 at least 180 days prior to initial fuel load is a potential condition to the license. A proposed license condition is provided in section 3 below.

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2.7 Others

The current operating licenses have some typical license conditions in areas such as security, fire protection and others. These current license conditions may or may not apply to COLs.

3. Specific Proposed License Conditions

The license conditions identified thus far during the COL development and review are:

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 10 - ITAAC and Proposed License Conditions**

Proposed License Condition	Source
The plant-specific PTS evaluation of the as-procured reactor vessel material properties will be submitted to the NRC within 12 months following acceptance of the reactor vessel.	Answer to RAI 2353 (CP RAI #8) question 05.03.02-3 as provided in TXNB-09028 dated August 7, 2009.
The licensee shall implement the programs or portions of programs identified in the table below on or before the associated milestones.	COLA FSAR Table 13.4-201 Items 3, 5, 6, 8, 9, 10, 12, 15, 18, and 19. <u>COLA FSAR Subsection 10.2.3.5</u>
<p><u>A. Prior to the full-participation exercise to be conducted in accordance with the requirements of Appendix E to 10 CFR Part 50, Luminant shall establish Letters of Agreement with the following entities:</u></p> <p><u>a. Governors Division of Emergency Management (GDEM), Texas Department of Public Safety</u></p> <p><u>b. Texas Department of State Health Services</u></p> <p><u>c. Hood County Judge</u></p> <p><u>d. Somervell County Judge</u></p> <p><u>These Letters of Agreement will identify the specific nature of arrangements in support of emergency preparedness for operation of the proposed new nuclear units and certify the agency's concurrence with the emergency action levels described in Comanche Peak Units 3 & 4 Combined License Application Emergency Plan Procedure, "Assessment of Emergency Action Levels, Emergency Classification and Plan Activation."</u></p> <p><u>B. The licensee shall complete development of the site-specific Emergency Action Levels (EALs) presented in Appendix 1 to the Comanche Peak Nuclear Power Plant Units 3 & 4 Combined License Application Emergency Plan in accordance with NEI 99-01, Revision 5, with few differences or deviations. The fully developed site-specific EAL scheme shall be submitted to the NRC for confirmation at least 180 days prior to initial fuel load.</u></p>	<p><u>Answer to RAI 3295 (CP RAI #70) question 13.03-1 and RAI 3327 (CP RAI #78) questions 13.03-2 and 13.03-8.</u></p>

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3-1 S01

Operational Programs to be implemented per License Condition above:

Program Title	Milestone
Environmental Qualification Program	Prior to Initial Fuel Load

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 10 - ITAAC and Proposed License Conditions**

Program Title	Milestone
<u>FFD Program for persons required to physically report to the TSC or EOF</u>	<u>Prior to the conduct of the first full-participation emergency preparedness under 10 CFR 50, App E, Section F.2.a</u>
<u>FFD Program for Operation</u>	<u>Prior to the earlier of:</u> <u>Licensee's receipt of fuel assemblies onsite or</u> <u>Establishment of a protected area or</u> <u>The 10 CFR 52.103(g) finding</u>
<u>Turbine inspection program</u>	<u>Prior to fuel load</u>

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NONE-3

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