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Ref. # 10 CFR 52

CP-201001302 Log # TXNB-10066

September 29, 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 4DOCKET NUMBERS 52-034 AND 52-035SUPPLEMENTAL INFORMATION FOR THE RESPONSE TO REQUEST FOR
ADDITIONAL INFORMATION NO. 3592, 4606, 4607, AND 4841

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein supplemental information for the response to Request for Additional Information (RAI) No. 3592, 4606, and 4607 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. In the response to RAI No. 4841 in letter TXNB-10062 dated September 10, 2010, Luminant committed to provide supplemental information by September 30, 2010 (Commitment #7781). As a result of a conference call with the NRC on September 23, 2010 requesting additional information, that commitment due date has been extended until October 25, 2010.

A compact disc containing marked-up pages for the response to RAI No. 4607 and containing Calculation TXUT-001-ER-5.3-CALC-005, Rev. 4 is enclosed with this letter. Distribution addressees will receive the pages and calculation electronically. Should you have any questions regarding this response, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

A new commitment is captured on page 2 of this letter.

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

Executed on September 29, 2010.

Sincerely,

Luminant Generation Company LLC

Orneld R. Woodlaw Jor

Rafael Flores

Attachments: 1. Supplemental Response to Request for Additional Information No. 3592 (CP RAI #71)

- 2. Supplemental Response to Request for Additional Information No. 4606 (CP RAI #155)
- 3. Supplemental Response to Request for Additional Information No. 4607 (CP RAI #156)
- 4. List of Contents on the Enclosed CD

Enclosure:

CD containing marked-up pages and TXUT-001-ER-5.3-CALC-005, Rev. 4

Regulatory Commitments in this Letter

This communication contains the following new or revised commitments which will be completed or incorporated into the CPNPP licensing basis as noted. The Commitment Number is used by Luminant for internal tracking.

Number	<u>Commitment</u>	Due Date/Event
7781	This response [to Question 02.05.04-22] will be supplemented with figures to provide additional information regarding excavations, fills and slopes for Category I structures	October 25, 2010
7811	Luminant is determining if there are other necessary changes to the FSAR resulting from the response to this question [to CP RAI #155 Question 02.03.01-6]. Any additional FSAR changes will be submitted as a supplement to this response no later than October 29, 2010.	October 29, 2010

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Electronic distribution w/attachments:

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Attachment 1

Supplemental Response to Request for Additional Information No. 3592 (CP RAI #71)

SUPPLEMENTAL 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.: 3592 (CP RAI #71)

SRP SECTION: 13.04 - Operational Programs

QUESTIONS for Health Physics Branch (CHPB)

DATE OF RAI ISSUE: 9/20/2009

QUESTION NO.: 13.04-1

10 CFR 20.1406 requires licensees to minimize contamination of the facility and the environment. Regulatory Guide 4.21, Minimization of Contamination and Radioactive Waste Generation: Life Cycle Planning," (June 2008) notes that a conceptual site model and ground water monitoring programs are part of a leakage detection and minimization program. NEI Template 08-08 (Draft) "Generic FSAR Template Guidance for Life Cycle Minimization of Contamination", a proposed acceptable method of demonstrating compliance with 10 CFR 20.1406, notes that applicants should develop the appropriate site procedures and implement these procedures and programs consistent with applicant's FSAR section 13.4 (prior to initial fuel load as referenced in Radiation Protection Milestone 3). However, COL FSAR Section 13.4 does not contain any milestones for the development of a ground water monitoring program.

Please revise and update COL FSAR Section 13.4 to describe the ground water monitoring implementation milestone, or provide an alternate approach and the associated justification.

SUPPLEMENTAL INFORMATION:

In the response to this question (ML093130123), the ground water monitoring program was grouped with the Chapter 11 programs in FSAR Table 13.4-201. As a result of a conference call with the NRC on September 2, 2010, Luminant has moved the ground water monitoring program to the Chapter 12 program group on FSAR Table 13.4-201, Sheet 5.

Impact on R-COLA

See attached marked-up FSAR Revision 1 pages 13.4-5 and 13.4-6.

Impact on DCD

None.

STD COL 13.4(1)

Table 13.4-201 (Sheet 4 of 9)

Operational Programs Required by NRC Regulation and Program Implementation

		FSAR Program Source (SRP		Implemer	ntation	
Item	Program Title	(Required By)	Section	Milestone	Requirement	
	Radiological Effluent Technical Specifications/ Standard Radiological Effluent Controls	10 CFR 20.1301 and 20.1302 10 CFR 50.34a 10 CFR 50.36a	11.5	Receipt of radioactive material on-site	License Condition	
		10 CFR 50, Appendix I, section II and IV				
	Offsite Dose Calculation manual	Same as above	11.5	Receipt of radioactive material on-site	License Condition	
	Radiological Environmental Monitoring Program	Same as above	11.5	Receipt of radioactive material on-site	License Condition	
	Process Control Program	Same as above	11.4	Receipt of radioactive material on-site	License Condition	RCOL_13.04
10.	Radiation Protection Program	10 CFR 20.1101	12.5	Prior to initial receipt of by-product, source, or special nuclear materials (excluding Exempt Qualities as described in 10 CFR 30.18) for those elements of the Radiation Protection (RP) Program necessary to support such receipt	License Condition	RCOL2_13.0 4-1 S01

STD COL 13.4(1)

Table 13.4-201 (Sheet 5 of 9)

Operational Programs Required by NRC Regulation and Program Implementation

		FSAR Program Source (SRP)		Implemen	tation	
ltem	Program Title	(Required By)	Section	Milestone	Requirement	
				Prior to fuel receipt for those elements of the RP Program necessary to support receipt and storage of fuel on-site		
				Prior to fuel load for those elements of the RP Program necessary to support fuel load and plant operation		
				Prior to first shipment of radioactive waste for those elements of the RP Program necessary to support shipment of radioactive waste		
	Ground Water Monitoring Program	<u>10 CFR 20.1406</u>	<u>12.5</u>	Prior to fuel load	License Condition	RCOL2_13.0 4-1 S01
11.	Non licensed Plant Staff Training Program	10 CFR 50.120 10 CFR 52.78	13.2.1	18 months prior to scheduled fuel load	10 CFR 50.120(b)	
12.	Reactor Operator Training Program	10 CFR 55.13 10 CFR 55.31	13.2.1	18 months prior to scheduled fuel load	License Condition	
		10 CFR 55.41				
		10 CFR 55.43				
		10 CFR 55.45				

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Attachment 2

Supplemental Response to Request for Additional Information No. 4606 (CP RAI #155)

SUPPLEMENTAL 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.: 4606 (CP RAI #155)

SRP SECTION: 02.03.01 - Regional Climatology

QUESTIONS for Siting and Accident Conseq Branch

DATE OF RAI ISSUE: 4/27/2010

QUESTION NO.: 02.03.01-6

NUREG-0800, Standard Review Plan (SRP), Chapter 2.3.1, Regional Climatology,' establishes criteria that the NRC staff intends to use to evaluate whether an applicant meets the NRC's regulations.

10 CFR 52.79(a)(1)(iii) states, in part, that the COL application must contain the meteorological characteristics of the proposed site with appropriate consideration of the most severe of the natural phenomena that have been historically reported for the site and surrounding area and with sufficient margin for the limited accuracy, quantity, and time in which the historical data have been accumulated.

The staff considers temperatures based on a 100-year return period to provide sufficient margin for the limited accuracy, quantity, and period of time in which the historical data have been accumulated as required by the regulation. This is why SRP 2.3.1 states that 100-year return period ambient temperature and humidity statistics should be identified as site characteristics. Thus, the staff believes the higher of either the maximum recorded dry-bulb value or the maximum 100-year dry-bulb value should be listed as the 0 percent exceedance maximum dry-bulb site characteristic value. Similarly, the lower of either the minimum recorded dry-bulb value or the minimum 100-year dry-bulb value should be listed as the 0 percent exceedance minimum dry-bulb site characteristic value.

- The staff has found, through the use of the 2005 ASHRAE Handbook Fundamentals for Dallas, TX, the 100-year return period maximum dry-bulb temperature to be higher than that provided in FSAR Table 2.0-1R and FSAR Table 2.3-202. Please either update the appropriate FSAR Sections with a revised 100-year return period maximum dry bulb temperature, or justify the use of the current temperature.
- The staff has found, through the use of the 2005 ASHRAE Handbook Fundamentals for Dallas, TX, the 100-year return period minimum dry-bulb temperature to be lower than that provided in FSAR Table 2.0-1R and FSAR Table 2.3-202. Please either update the appropriate FSAR Sections with a revised 100-year return period minimum dry bulb temperature, or justify the use of the current temperature.

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SUPPLEMENTAL INFORMATION:

FSAR Tables 2.0-1R and 2.3-202 have been revised with the 100-year return period maximum and minimum dry bulb temperatures. The temperatures were calculated using the 2009 ASHRAE Design Condition Table for the Dallas/Fort Worth International Airport Station extrapolated out to a 100-year return period using the method presented in the 2009 ASHRAE Fundamental Handbook Chapter 14, Climatic Design Information. The resulting 100-year return maximum dry bulb temperature was 115°F and the minimum dry bulb temperature was -5°F.

The wet bulb temperature corresponding to the calculated 100-year return period, maximum dry bulb temperature of 115°F was estimated to be approximately 78°F. Since extreme dew point conditions (i.e. humidity ratio) do not occur during extreme dry-bulb temperatures, the "coincident" wet bulb temperature for 100-year return period has no direct relationship to the 100-year extreme maximum dry bulb temperature.

The "coincident" wet bulb temperature (approximately 78°F) for the calculated 100-year return period extreme maximum dry bulb temperature of 115°F was obtained by analyzing the site 30-years hourly meteorological data of dry bulb temperature readings from 90°F to 112°F and their corresponding (coincident) wet bulb temperatures (read from available data). As discussed in ASHRAE, extreme dew point conditions in this case occur on days with more moderate dry bulb temperatures. The resulting wet bulb temperature tends to decrease with dry bulb temperature (beginning in the 90-99°F range) to around 78°F at the extreme end of the dry bulb readings.

FSAR Tables 9.4-201 and 9.4-202 have been revised to reflect the 100-yr return period temperature in the next revision. Luminant is determining if there are other necessary changes to the FSAR resulting from the response to this question. Any additional FSAR changes will be submitted as a supplement to this response no later than October 29, 2010.

Impact on R-COLA

See attached marked-up FSAR Revision 1 pages 2.0-3, 2.3-55, and 2.3-61.

Impact on DCD

None.

Table 2.0-1R (Sheet 2 of 15) Key Site Parameters

	Extreme wind speed (other than in tornado)	155 mph for 3-second gusts at 33 ft aboveground level based on 100-year return period, with importance factor of 1.15 for seismic category I/II structures	90<u>96</u> mph for-3-second gust wind speed at 33-ft aboveground
	Ambient design air temperature (1% exceedance maximum)	100°F dry bulb, 77°F coincident wet bulb, 81°F non-coincident wet bulb	99°F dry bulb, 75°F coincident wet bulb, 78°F non-coincident wet bulb
COL 2.1(1) COL 2.2(1) COL 2.3(1) COL 2.3(2)	Ambient design air temperature (0% exceedance maximum)	115°F dry bulb, 80°F coincident wet bulb, 86°F non-coincident wet bulb, historical limit excluding peaks <2 hr	112°F dry bulb, 78°F coincident wet bulb, 83°F non-coincident wet bulb, historical limit excluding peaks <2 hr; <u>115°F dry bulb,</u> <u>78°F coincident wet bulb,</u> <u>100-year return period</u>
COL 2.3(3) COL 2.4(1)	Ambient design air temperature (1% exceedance minimum)	-10°F dry bulb	25°F dry bulb
COL 2.5(1)	Ambient design air temperature (0% exceedance minimum)	-40°F dry bulb, historical limit excluding peaks <2 hr	-0.5°F dry bulb, historical limit excluding peaks <2 hr <u>;</u> <u>-5°F dry bulb,</u> <u>100-year return period</u>
	Atmospheric dispersion factors (χ /Q values) i	for on-site locations:	
	Exclusion area boundary (EAB) 0-2 hrs	5.0×10 ⁻⁴ s/m ³	3.70×10 ⁻⁴ s/m ³
	EAB annual average	1.6×10 ⁻⁵ s/m ³	5.5×10 ⁻⁶ s/m ³

2.3-229 National Climatic Data Center (NCDC), Asheville, North Carolina, Texas Climate, s.v. ì,î http://cdo.ncdc.noaa.gov/climatenormals/clim60/states/Clim_TX_0 1, accessed February 12, 2008.

2.3-230 United States Historical Climatology Network, s.v. ì,î http://cdiac.ornl.gov/cgi-bin/broker?_PROGRAM=prog.climsite.sas &_SERVICE=default&id=412598, accessed December 9, 2007 4:14 PM

- 2.3-231 Comanche Peak Steam Electric Station. 2007. Comanche Peak Steam Electric Station Radiation Protection Manual Routine Operations of the Meteorological Computer System Instruction No. RPI – 309. Revision No.8. (February 19, 2007).
- 2.3-232 Ventilation Climate Information System, USDOI-USDA Joint Fire Science Program. s.v. ì,î http://web.airfire.org/vcis/, accessed September 10, 2007.
- 2.3-233 American Lifelines Alliance, a public-private partnership between the Federal Emergency Management Agency (FEMA) and the National Institute of Building Sciences (NIBS), Extreme Ice Thicknesses from Freezing Rain, September 2004. www.americanlifelinesalliance.org
- 2.3-234 National Weather Service, National Hurricane Center, http://www.nhc.noaa.gov/
- 2.3-235 ASHRAE Fundamentals Handbook 2009, Chapter 14, Climatic Design Information

RCOL2_02.0 3.01-6 S01

Revision 1

Table 2.3-202 (Sheet 4 of 4) Dallas-Fort Worth TX (DFW) Normals, Means, and Extremes

CP COL 2.3(1)

)	ELEMENT	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Yr
	NORMAL (IN)	0.8	1.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.*	0.2	0.2	2.5
	MAXIMUM MONTHLY (IN)	12.1	13.5	2.5	Т	Т	0.0	0.0	0.0	0.0	Т	5.0	2.6	13.5
	YR OF OCCURRENCE	1964	1978	1962	1995	1995					1993	1976	1963	FEB 1978
ALL	MAXIMUM IN 24 HOURS (IN)	12.1	7.5	2.5	Т	Т	0.0	0.0	0.0	0.0	т	4.8	2.5	12.1
SNOWFAL	YR OF OCCURRENCE	1964	1978	1962	1995	1995				•	1993	1976	1963	JAN 1964
ON N	MAXIMUM SNOW DEPTH (IN)	6	8	2	0	0	0	0	0	0	0	3	2	8
0,	YR OF OCCURRENCE	1964	1978	1971								1976	1983	FEB 1978
	NORMAL NO. DAYS WITH:													
	SNOWFALL ≥ 1.0	0.4	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	1.0

	Annual Exceedance ³				
	0.4%	1%	2%		
Dry Bulb	100 F	98 F	96 F		
Coincident Wet Bulb	74 F	74 F	74 F		

Non-coincident Wet Bulb	78 F	77 F	76 F	
		100-yr Return Temperature	-(°F) ³ Period	RC
	Extreme Maximum Dry Bulb		03	
	Coincident Wet Bulb		-7.5 78 F	
	Extreme Minimum Dry Bulb		<u>-5 F</u>	

NOTES:

1. Dallas-Fort Worth, Texas (WBAN Station No. 3927), Monthly Climate Summary, Period of Record: 1971 to 2000.

2. Reference: Southern Regional Climate Center, http://www.srcc.lsu.edu/southernClimate/atlas/

3. ASHRAE Fundamentals, Chapter 27, 200114, 2009 (Reference 2.3-235).

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RCOL2_

.03.01-6

S01

Revision 1

U. S. Nuclear Regulatory Commission CP-201001302 TXNB-10066 9/29/2010

Attachment 3

Supplemental Response to Request for Additional Information No. 4607 (CP RAI #156)

SUPPLEMENTAL 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.: 4607 (CP RAI #156)

SRP SECTION: 02.03.02 - Local Meteorology

QUESTIONS for Siting and Accident Conseq Branch (RSAC)

DATE OF RAI ISSUE: 4/27/2010

QUESTION NO.: 02.03.02-4

As follow-up to RAI 2.3.2-2, the staff conducted a review of the SACTI files and cooling tower calculation from ENERCON (Calculation No. TXUT-001-ER-5.3-CALC-005, Rev. 2, 3/19/2009; Plume Characteristics of Proposed Cooling Towers at Comanche Peak) provided by Luminant. The staff has found what it believes to be several inconsistencies with the calculations provided. Please note and respond to the following:

In Table 3 of the calculation, the y-values appear to have been calculated using SIN(30 degrees), in the equations at the bottom of page 16 of 34, instead of using COS(30 degrees).

In Card 26 of PREP.USR (as described on page 17 of 34 of the calculation), three representative wind directions are to be selected for the tower based on SACTI recommendations. These wind directions are suggested to be a wind at 45 degrees to the tower, a direction perpendicular to the tower, and the direction along the tower's long axis. The tower is oriented approximately 30 degrees west of north. The wind directions selected by Enercon, were 0, 60, and 150 degrees, respectively. The second and third angles are consistent with the SACTI recommendation, but the first wind direction is only oriented 30 degrees and not 45 degrees off of the tower. A wind direction of 15 degrees east of north would be oriented 45 degrees off of the tower. Please clarify why a wind direction with a 30 degree orientation off the tower was used, instead of 45 degrees.

Card 27 in PREP.USR. From Card 26 the representative wind direction designators are as follows: 1 for a 15 degree wind [diagonal], 2 for a 60 degree wind [perpendicular], and 3 for a 150 degree wind [along the towers long axis]. It appears then in Card 27, the designations should be (approximately) as follows for the 16 wind sectors (starting at north and going clockwise): 1122113311221133. This designation scheme assumes the following orientation of the wind to the tower for the 16 wind directions:

N wind - Diagonal to tower NNE wind - Diagonal to tower NE wind - Perpendicular to tower ENE wind - Perpendicular to tower E wind - Diagonal to tower U. S. Nuclear Regulatory Commission CP-201001302 TXNB-10066 9/29/2010 Attachment 3 Page 2 of 2

> ESE wind - Diagonal to tower SE wind - Along tower axis SSE wind - Along tower axis S wind - Diagonal to tower SSW wind - Diagonal to tower SW wind - Perpendicular to tower WSW wind - Perpendicular to tower W wind - Diagonal to tower WNW wind - Diagonal to tower NW wind - Along tower axis NNW wind - Along tower axis



3

Clarify why a different set of wind direction designators were used in Calculation No. TXUT-001-ER-5.3-CALC-005, Rev. 2, 3/19/2009; Plume Characteristics of Proposed Cooling Towers at Comanche Peak.

SUPPLEMENTAL INFORMATION:

Some of the Environmental Report (ER) changes intended for the response to this question were inadvertently omitted in TXNB-10048 (ML101810388). ER Table 5.3-3 has been revised to confirm that the main cooling tower circulating water flow is 1,317,720 gpm per unit and the drift rate is 6.6 gpm per unit. Therefore, the total drift rate is 13.2 gpm for Units 3 and 4 combined. These values are in agreement with TXUT-001-ER-5.3-CALC-005, Rev 3 previously provided as an attachment to this response. ER Table 5.3-3 has been revised to state all values in terms of per unit, as opposed to per cell or per tower. The "Number of cells/tower" and "Cell exit diameter" were determined to be of limited value and were deleted. The "Cooling water salt concentration" line item value is variable and unrelated to the circulating water flow or drift rate, so it was deleted.

Calculation TXUT-001-ER-5.3-CALC-005 has been revised to allow all four tower housings to be oriented similarly. Previously, the orientation for one tower housing was input as 150 degrees with the other three tower housings defaulting to 180 degrees. This revision has a small impact on the results with most of the associated values changing slightly. The deposition rates are still below 1-2 kg/ha/month (100-200 kg/km²/month) beyond a short distance from the cooling towers. Revision 4 to the calculation is attached.

Attachment (on CD)

TXUT-001-ER-5.3-CALC-005, Rev. 4, Plume Characteristics of Proposed Cooling Towers at Comanche

Impact on R-COLA

See attached (on CD) marked-up FSAR Revision 1 pages 2.3-35, 2.3-36, 2.3-215, 2.3-216, 2.3-217, 2.3-218, 2.3-219, 2.3-220, 2.3-221, 2.3-222, 2.3-223, 2.3-224, 2.3-225, 2.3-226, 2.3-227, 2.3-231, 2.3-232, 2.3-233, 2.3-237, 2.3-238, 2.3-239, 2.3-243, 2.3-244, 2.3-245, 2.3-249, 2.3-250, 2.3-251, 2.3-252 and Figures 2.3-372, 2.3-373, 2.3-374, 2.3-375, 2.3-376, 2.3-377, 2.3-378, and 2.3-379.

See attached (on CD) marked-up ER Revision 1 pages 5.3-13, 5.3-15, 5.3-22, 5.3-23, 5.3-24, 5.3-25, 5.3-26, 5.3-27, 5.3-28, and 5.3-29 (on CD)

Impact on DCD

None.

U. S. Nuclear Regulatory Commission CP-201001302 TXNB-10066 9/29/2010

Attachment 4

List of Contents on the Enclosed CD

Marked-up Final Safety Analysis Report Pages for RAI No. 4607 (CP RAI #156) 2.3-35 2.3-222 2.3-237 2.3-252 2.3-36 2.3-223 2.3-238 Figure 2.3-372 2.3-224 2.3-215 2.3-239 Figure 2.3-373 2.3-216 2.3-225 2.3-243 Figure 2.3-374 2.3-226 Figure 2.3-375 2.3-217 2.3-244 Figure 2.3-376 2.3-218 2.3-227 2.3-245 2.3-219 2.3-231 2.3-249 Figure 2.3-377 2.3-220 2.3-232 2.3-250 Figure 2.3-378 2.3-221 2.3-233 2.3-251 Figure 2.3-379

Marked-up Environmental Report Pages for RAI No. 4607 (CP RAI #156)

5.3-13	5.3-23	5.3-26	5.3-29
5.3-15	5.3-24	5.3-27	
5.3-22	5.3-25	5.3-28	

TXUT-001-ER-5.3-CALC-005, Rev. 4, Plume Characteristics of Proposed Cooling Towers at Comanche Peak