

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Monday, October 25, 2010 5:25 PM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; cp34-rai-luminant@mnes-us.com; Diane Yeager; Eric.Evans@luminant.com; joseph tapia; Kazuya Hayashi; Matthew.Weeks@luminant.com; MNES RAI mailbox; Russ Bywater  
**Cc:** ComanchePeakCOL Resource; Smith, Rich  
**Subject:** Comanche Peak RCOL Chapter 16, - RAI Number 186  
**Attachments:** RAI 5164 (RAI 186).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within **35** calendar days of October 25, 2010.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed changes.

thanks,

Stephen Monarque  
U. S. Nuclear Regulatory Commission  
NRO/DNRL/NMIP  
301-415-1544

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 1140

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**From:** Monarque, Stephen

**Created By:** Stephen.Monarque@nrc.gov

**Recipients:**

"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>

Tracking Status: None

"Smith, Rich" <Rich.Smith@nrc.gov>

Tracking Status: None

"John.Only@luminant.com" <John.Only@luminant.com>

Tracking Status: None

"Donald.Woodlan@luminant.com" <Donald.Woodlan@luminant.com>

Tracking Status: None

"cp34-rai-luminant@mnes-us.com" <cp34-rai-luminant@mnes-us.com>

Tracking Status: None

"Diane Yeager" <diane\_yeager@mnes-us.com>

Tracking Status: None

"Eric.Evans@luminant.com" <Eric.Evans@luminant.com>

Tracking Status: None

"joseph tapia" <joseph\_tapia@mnes-us.com>

Tracking Status: None

"Kazuya Hayashi" <kazuya\_hayashi@mnes-us.com>

Tracking Status: None

"Matthew.Weeks@luminant.com" <Matthew.Weeks@luminant.com>

Tracking Status: None

"MNES RAI mailbox" <cp34-rai@mnes-us.com>

Tracking Status: None

"Russ Bywater" <russell\_bywater@mnes-us.com>

Tracking Status: None

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**Options**

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**Recipients Received:**

Request for Additional Information (RAI) No. 5164, COLA Revision 1

RAI Number 186

10/25/2010

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035  
SRP Section: 16 - Technical Specifications  
Application Section: 5.5.18 and 5.5.19

QUESTIONS for Technical Specification Branch (CTSB)

16-20

The NRC staff is issuing this supplemental RAI on generic technical specification (GTS) 5.5.18 and GTS 5.5.19. NUREG-0800, Standard Review Plan, Chapter 16, 'Technical Specifications,' establishes the criteria that the NRC staff intends to use to evaluate whether an applicant meets the NRC's regulations.

- (1) At the time the staff issues the combined license (COL), the plant-specific technical specifications (PTS) must be complete, implemented, and not contain any open COL action items, as noted in COL/DC-ISG-8, "Technical Specification Information that Combined License Applicants Must Provide in Combined License Applications." Therefore, COL applicants (i.e., Comanche Peak), who choose to adopt the Risk Management Technical Specification (RMTS) Initiative 4b, Risk-Informed Completion Times (RICT), and Initiative 5b, Surveillance Frequency Control Program (SFCP), will need to submit plant specific changes to Nuclear Energy Institute (NEI) 06-09 and NEI 04-10 for NRC staff review. The NRC staff will need to review and approve of all changes to NEI 06-09 and NEI 04-10 before the staff issues the final safety evaluation report (SER) for the COL. In addition, the process (methodology) for preparing the supporting probabilistic risk assessment (PRA) for the RMTS initiatives must be established at the issuance of the COL, in order for the staff to achieve review finality.
- (2) The NRC staff notes that acceptance of GTS 5.5.18 and GTS 5.5.19 for the Comanche Peak Nuclear Power Plant COL will remain as open items until the NRC staff approves of changes to Regulatory Guidance (RG) 1.1.74 and RG 1.177, as referenced in NEI 06-09 Revision 0 and NEI 04-10 Revision 1, and the risk profiles for the new reactors.
- (3) GTS 5.5.18 paragraph b is not strictly in accordance with NEI 06-09 Revision 0, section 2.3.1 paragraph 5. Luminant is requested to either revise paragraph b to state, "The RICT shall be recalculated prior to exceeding the most limiting technical specification front-stop CT, but not later than 12 hours from the plant configuration change," or, since this is redundant to NEI 06-09 Revision 0, delete paragraph b. A third alternative would be for Luminant to revise paragraph b to simply state, "The RICT shall be recalculated whenever plant configuration change occurs, in accordance with NEI 06-09."

In order to facilitate necessary TS changes to accommodate the RMTS initiatives, Luminant is requested to make the following changes to the Comanche Peak Nuclear Power Plant TS to be consistent with the US-APWR TS.

1. Add to TS 5.5.18 paragraph c.3, "PRA model to meet the technical adequacy requirements of NEI 06-09 and [ISG on PRA development]",
2. In TS 5.5.18 paragraph a, bracket "[NEI 06-09 (Revision y)/ and supplemental documentation]."
3. In TS 5.5.19 paragraph b, bracket : "[NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision z/ and supplemental documentation]."
4. Revise TS 5.5.18 paragraph b to state "The RICT shall be recalculated whenever plant configuration change occurs, ~~within 12 hours from the configuration change~~ in accordance with NEI 06-09." Delete the phrase ' within 12 hours from the configuration change.'