



Luminant

Rafael Flores
Senior Vice President &
Chief Nuclear Officer
rafael.flores@luminant.com

Luminant Power
P O Box 1002
6322 North FM 56
Glen Rose, TX 76043

T 254.897.5590
F 254.897.6652
C 817.559.0403

CP-201001400
Log # TXNB-10074

Ref. # 10 CFR 52

October 25, 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
COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein comments on the Environmental Impact Statement for Combined Licenses (COLs) for Comanche Peak Nuclear Power Plant Units 3 and 4 (NUREG-1943) - Draft Report for Comment.

Should you have any questions regarding these comments, 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 October 25, 2010.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: Luminant Comments on the Environmental Impact Statement for Combined Licenses (COLs) for Comanche Peak Nuclear Power Plant Units 3 and 4 (NUREG-1943) - Draft Report for Comment

DD9D
NRD

Electronic distribution w/attachment:

Rafael.Flores@luminant.com
mlucas3@luminant.com
jeff.simmons@energyfutureholdings.com
Bill.Moore@luminant.com
Brock.Degeyter@energyfutureholdings.com
rbird1@luminant.com
Allan.Koenig@luminant.com
Timothy.Clouser@luminant.com
Ronald.Carver@luminant.com
David.Volkening@luminant.com
Bruce.Turner@luminant.com
Eric.Evans@luminant.com
Robert.Reible@luminant.com
donald.woodlan@luminant.com
John.Only@luminant.com
JCaldwell@luminant.com
David.Beshear@txu.com
Ashley.Monts@luminant.com
Fred.Madden@luminant.com
Dennis.Buschbaum@luminant.com
Carolyn.Cosentino@luminant.com
NuBuild Licensing files

shinji_kawanago@mnes-us.com
masanori_onozuka@mnes-us.com
ck_paulson@mnes-us.com
joseph_tapia@mnes-us.com
russell_bywater@mnes-us.com
william_mconaghy@mnes-us.com
mutsumi_ishida@mnes-us.com
nan_sirirat@mnes-us.com
nicholas_kellenberger@mnes-us.com
ryan_sprengel@mnes-us.com
katsunori_kawai@mnes-us.com
masaya_hoshi@mnes-us.com
rjb@nei.org
kak@nei.org
michael.takacs@nrc.gov
cp34update@certrec.com
michael.johnson@nrc.gov
David.Matthews@nrc.gov
Balwant.Singal@nrc.gov
Hossein.Hamzehee@nrc.gov
Stephen.Monarque@nrc.gov
jeff.ciocco@nrc.gov
michael.willingham@nrc.gov
john.kramer@nrc.gov
Brian.Tindell@nrc.gov
Alicia.Williamson@nrc.gov
Elmo.Collins@nrc.gov
Loren.Plisco@nrc.com
Laura.Goldin@nrc.gov
James.Biggin@nrc.gov
Susan.Vrahoretis@nrc.gov
ComanchePeakCOL.Resource@nrc.gov
sfrantz@morganlewis.com
jrund@morganlewis.com
tmatthews@morganlewis.com
regina.borsh@dom.com
diane.aitken@dom.com

Luminant Records Management (.pdf files only)

**Luminant Comments on the
Environmental Impact Statement for Combined Licenses (COLs) for
Comanche Peak Nuclear Power Plant Units 3 and 4 (NUREG-1943)
Draft Report for Comment**

Luminant's review of the Draft Environmental Impact Statement (DEIS) found the DEIS to be a conservative, bounding assessment of the potential environmental impacts of CPNPP Units 3 and 4. Many of the impacts in the DEIS, if not most of them, would never occur to the extent discussed in the DEIS. As a result, some impacts determined by Luminant to be SMALL in the Environmental Report (ER) were found by the NRC to be SMALL to MODERATE in the DEIS. This is not inconsistent, rather a reflection of the very conservative assessment performed by the NRC in reviewing the ER. The impacts stated in the DEIS are not expected to occur, but conservatively bound the impacts that might potentially be expected.

Luminant's specific comments by DEIS section number follow:

DEIS Section 2.3.1.2, page 2-20, lines 9-15:

Eleven existing water wells were identified on the CPNPP site. The wells include: six potable water wells that support CPNPP Units 1 and 2 operations; four observation wells, one of which was identified as a converted domestic well; and one privately owned stock well.

Comment: ER Revision 0 did state there were 11 onsite wells, but the number was revised in Revision 1 to correctly state 12 onsite wells. The wells include seven active potable water wells that support CPNPP Units 1 and 2 operations, one inactive potable water well associated with Squaw Creek Park, and four observation wells. [ER 2.3.2.3]

DEIS Section 3.2.2.1, page 3-9, lines 1-5:

During normal operation, the Wheeler Branch Reservoir (WBR) supplies up to 300 gpm. This water supply includes up to 50 gpm for daily potable water use for the entire site and from 0 to 250 gpm to the raw water storage tanks, which in turn supply water to the demineralized water system (DWS). The amount of water needed from WBR is bounded by the maximum delivery rate of 300 gpm, with the estimated monthly maximum being 1.3×10^7 gal.

Comment: According to the response to ER Request for Additional Information (RAI) HYD-27 (ML100630660), WBR supplies up to 350 gpm during normal operation, of which 50 gpm is for potable and from 0 to 300 gpm is for the raw water storage tanks. The estimated monthly maximum is 1.51×10^7 gal.

DEIS Section 3.3.1.13, page 3-23, lines 40-42:

Two additional gravity-drain 42-in. blowdown discharge pipelines (one from Unit 3 and one from Unit 4) with multiport diffusers are to be located approximately 900 ft upstream from DeCordova Bend Dam, in the vicinity of the existing discharge pipe.

Comment: According to the response to ER RAI SOC-33 (ML100710613), the diffusers are planned to be located approximately 800 ft upstream from DeCordova Bend Dam.

DEIS Section 3.4.4.1, page 3-39, lines 33-43:

Luminant reports that total suspended solids (TSS) in the vicinity of DeCordova Bend Dam near the south end of Lake Granbury average 11 mg/L with a range of results from 2 to 120 mg/L. Luminant does not report discharge of TSS. Luminant reports that TDS in blowdown discharged to Lake Granbury would be limited to 2500 mg/L "assuming the inlet TDS concentration is 1680 mg/L" (Luminant 2009a).

Comment: The use of 1680 mg/l TDS was removed from the ER by the supplemental response to ER RAI GEN-03 (ML093620032) because the statement was no longer valid.

DEIS Section 5.1.1, page 5-5, lines 41-48:

The SMALL to MODERATE conclusion also reflects the potential for salt drift from operation of the BDTF to affect rural residential properties adjoining the CPNPP perimeter. The most serious potential adverse effect of the salt drift on those properties would be salt-induced injury to sensitive landscape vegetation, as well as possible increased corrosion rates for aluminum siding and other metal structural components of houses. Possible mitigation measures, in addition to the salt fence and directional spray misting units proposed by Luminant, might include provision of salt-tolerant vegetation, compensation for corrosion of metal property, and, in the worst case, purchase of affected residential properties.

Comment: A summary of the meteorological data at CPNPP demonstrates that on an annual average the wind is generally out of the north (i.e., NW-to-NE sector) approximately 26% of the year, primarily from November through March. This wind direction would disperse the mist toward the CPNPP southern property boundary. The data summary also demonstrates the wind speed from the north averages between 9 to 13 mph with an annual average of approximately 10.3 mph. The Salton Sea Salinity Control Research Project, upon which Luminant's evaluation of the effects of BDTF operation were based, stated that salt and/or mist from the evaporators can travel 1,300 ft in a 10-mph wind. Luminant commits to limiting salt deposition beyond the CPNPP property boundary, which is greater than 1,300 ft from the BDTF, to minimize or totally prevent the potentially adverse impacts. ER Subsection 5.3.2.3 states that mitigative measures such as salt fences or wind velocity sensors that halt misting could be employed to contain salt drift when wind speeds exceed 10 mph. Therefore, Luminant is not considering "provision of salt-tolerant vegetation, compensation for corrosion of metal property, and, in the worst case, purchase of affected residential properties" as possible mitigation measures for BDTF operation.

DEIS Section 5.3.1.5, page 5-23, lines 38-43:

Luminant has also indicated that they plan to confer with USFWS and TPWD regarding possible measures to reduce operational impacts from the BDTF. There could potentially be a need for the following mitigation measures:

- Redesign and/or relocate BDTF to reduce potential for salt drift and fogging.
- Reroute existing transmission lines away from BDTF.

Comment: Luminant has shown in the ER that salt drift will be managed, and concluded (ML100630660) that steam fog produced by the evaporation pond would be thin and mister operation will not cause fog (TE-21). Luminant is not considering rerouting the existing transmission lines.

DEIS Section 5.11.2, page 5-91, lines 6-9:

The cumulative population dose associated with a severe accident without loss of containment at the CPNPP site is calculated to be 9 person-Sv. The population dose risk for this release class is the product of 1.1×10^{-6} Ryr-1 and 9 person-Sv, which equals 1.1×10^{-5} person-Sv Ryr-1.

Comment: The frequency of an intact containment event (RC6 – Intact Containment) is $1.1E-06$ /RY as provided in ER Table 7.2-6. The dose risk is presented in this table for the 2001, 2003 and 2006 meteorological data cases as: $9.97E-04$, $1.18E-03$, and $1.01E-03$ person-rem/Ry, respectively (note: 100 rem = 1 Sv). The NRC value of 1.1×10^{-5} person-Sv Ryr-1 is not supported by the information in the DEIS (i.e., 1.1×10^{-6} Ryr-1 times 9 person-Sv). This is a very minor difference and is only included to inform the NRC of the error.

DEIS Section 5.11.2.1, page 5-95, lines 22-26:

The average individual latent cancer fatality risk is calculated using the population distribution within 10 mi of the plant. For the plants considered in NUREG-1150, these risks were well below the Commission's safety goals (NRC 1990). Risks calculated for the US-APWR design at the CPNPP site as shown in Table 5-25 are also well below the Commission's safety goals.

Comment: The DEIS states that dose risk is calculated at 10 miles from the plant, but DEIS Table 5-25 is based on 50-miles