



Luminant

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10 CFR 2.390

October 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 4
DOCKET NUMBERS 52-034 AND 52-035
MITIGATIVE STRATEGIES REPORT, REVISION 01 (CHAPTER 19)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the site-specific Mitigative Strategies Report in accordance with and satisfying the requirements of 10 CFR 52.80(d). The report identifies the strategies Comanche Peak Nuclear Power Plant Units 3 and 4 will implement in the unlikely event that a large area of the facility is lost due to fires or explosions.

10 CFR 52.80(d) requires a Combined License (COL) applicant to submit a description and plans for implementation of the guidance and strategies intended to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities under the circumstances associated with the loss of large areas of the plant due to explosions or fire as required by 10 CFR 50.54(hh)(2). The enclosed report was prepared using the guidance of NUREG-0800 Subsection 13.6.5; NEI 06-12, "B.5.b Phase 2 and 3 Submittal Guideline," Rev. 3, Appendix D, July 17, 2009; and NRC Interim Guideline ISG-016. The changes incorporated in this revision are primarily to provide consistency with the wording used in the Appendix D template and the wording from ISG-016. Also for selected strategies, additional clarification of standard site processes was included to more clearly communicate the actions that would be taken.

The enclosed report is classified as "Security-Related Information" (SRI) to be withheld from public disclosure under 10 CFR 2.390(d)(1). This letter is unclassified upon removal of the enclosed report.

Page 3 of this letter notifies the NRC that Regulatory Commitments # 5911 and # 5961 made in letter TXNB-09022 dated May 22, 2009 (SRI) have been completed. Four new Regulatory Commitments are also listed in the attachment.

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ISG-016 states that an item related to 10 CFR 50.54(hh)(2) should be incorporated into the standard license conditions in Chapter 13 of the FSAR related to (1) implementation of specified programs and (2) submitting schedules to support planning and conduct of NRC inspections. The NRC and the industry are still discussing the format and content of standard license conditions. The CPNPP Units 3 and 4 COLs will include the standard license conditions developed by the NRC and the nuclear industry and as imposed by the NRC.

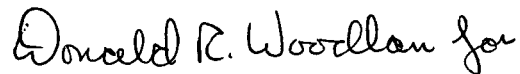
Should you have any questions regarding the enclosed report, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

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

Executed on October 29, 2010.

Sincerely,

Luminant Generation Company LLC

A handwritten signature in black ink that reads "Donald R. Woodlan for". The signature is written in a cursive style.

Rafael Flores

Enclosure: Mitigative Strategies Report for Comanche Peak Units 3 & 4 in Accordance with 10 CFR 50.54(hh)(2), Revision 01 (Security-Related Information)

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:

<u>Number</u>	<u>Commitment</u>	<u>Due Date/Event</u>	<u>Source</u> (Report section or Mitigative Strategy Table)
5911	Training will be performed for fire brigade personnel in large area accelerant fed fires.	DELETED - duplicate of #5901	
5961	The procedures to provide staged onsite water sources and an alternate offsite feed path to the ring header will be developed prior to fuel load.	Revision to template deleted this wording in the approved version. This commitment is DELETED.	
8191	Site procedures and guidelines address dosimetry for offsite responders, including estimates of quantities, the process for distribution and the process for acquiring additional dosimetry resources. These procedures will be revised and updated to incorporate Units 3 & 4.	Six months prior to fuel load	MST 1.1.9
8201	Guidance for the number, location and process for distribution of the radios is in site procedures and will be updated to include an appropriate number of radios for Units 3 & 4 using performance-based evaluations.	Six months prior to fuel load	MST 1.1.10
8211	CPNPP 3 & 4 guidance will contain requirements to maintain radios at multiple locations and have sufficient chargers and batteries.	Six months prior to fuel load	MST 1.2.2
8221	These Emergency Plan procedures have been evaluated and found to be adequate for projecting doses for offsite exposure for CPNPP 3 & 4 and will be revised to explicitly include CPNPP 3 & 4.	Six months prior to fuel load	MST 1.3.3

The Commitment Number is used by Luminant for internal tracking. Margin has been added to some completion milestones stated in the enclosed report to allow for review, training, etc.

cc: E-mail w/enclosure:

Stephen Monarque
James Biggins
Susan Vrahoretis
Luminant RMS

Tim Matthews
Bill Moore
Brock Degeyter
Steve Frantz

E-mail distribution w/o enclosure

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Luminant Records Management (.pdf files only)