



**Luminant**

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Ref. # 10 CFR 52

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  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION NO. 5099  
(SECTION 14.3.7)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 5099 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAI involves revising certain ITAAC.

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 October 29, 2010.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: Response to Request for Additional Information No. 5099 (CP RAI #181)

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MRO

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Luminant Records Management (.pdf files only)

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**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

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**Comanche Peak, Units 3 and 4**

**Luminant Generation Company LLC**

**Docket Nos. 52-034 and 52-035**

**RAI NO.: 5099 (CP RAI #181)**

**SRP SECTION: 14.03.07 - Plant Systems - Inspections, Tests, Analyses, and Acceptance Criteria**

**QUESTIONS for Technical Specification Branch (CTSB)**

**DATE OF RAI ISSUE: 10/19/2010**

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**QUESTION NO.: 14.03.07-33**

Comanche Peak Nuclear Power Plant COLA, Part 10, ITAAC Items 5a and 5b in Table A.3-1.

The NRC staff requested the applicant to revise or delete ITAAC 5a in RAI Number 82 (3366), RAI question 14.03.07-17 (13282) because (1) the walls, referred to in ITAAC Item 4 in Table A.3-1, could have the appropriate thickness to decrease the water seepage to zero, and (2) an analysis may be required in addition to the inspection to determine the appropriate thickness of the flood barriers to decrease the seepage to a certain value. If the water seepage is decreased to zero due to the walls in ITAAC Item 4, it does not seem that there would be a need for Item 5a and its flood barriers. The staff requested the applicant revise ITAAC 5b in RAI Number 82 (3366), RAI question 14.03.07-18 (13283) to define the flood protection features. The applicant, in its response, revised ITAAC Items 5.a and 5.b to indicate that the flood barriers are installed consistent with the design bases for flood protection. Inspections are used for both ITAAC to verify the existence of reports that indicate that the flood barriers are installed correctly. The staff agreed in part with the applicant's response for both of these ITAAC in that the exact locations and physicality of the flood barriers can be identified in reports similarly to figures and tables, but not that the inspection for these ITAAC is for the existence of those reports, instead of the as-built installations to verify the locations and integrity of the flood barriers. The staff requests that the applicant revise these ITAAC to indicate that the inspections will be of the as-installed flood barriers and not for the existence of the respective reports.

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**ANSWER:**

Luminant has revised each occurrence of the ITAAC that stated "an inspection for the existence of a report" as suggested by the NRC. Specifically Table A.1-1 Items 5.b.ii and 7, and Table A.3-1 Items 5.a and 5.b were revised in response to RAI No. 5004 (CP RAI #174) Question 14.03.07-29 (ML102810223).

Impact on R-COLA

None.

Impact on DCD

None.