



Luminant

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CP-201001520
Log # TXNB-10082

Ref. # 10 CFR 52

November 22, 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. 5201
(SECTION 13.4)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 5201 (CP RAI #187) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAI notes editorial discrepancies in Table 13.4-201.

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 November 22, 2010.

Sincerely,

Luminant Generation Company LLC


Rafael Flores

Attachment: Response to Request for Additional Information No. 5201 (CP RAI #187)

DO90
NRO

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Luminant Records Management (.pdf files only)

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.: 5201 (CP RAI #187)

SRP SECTION: 13.04 - Operational Programs

QUESTIONS for USAPWR Projects Branch (NMIP)

DATE OF RAI ISSUE: 11/9/2010

QUESTION NO.: 13.04-5

During the staff's review of Table 13.4-201, under Part 2 of the FSAR, three editorial discrepancies were discovered. Luminant is requested to make the following corrections:

- For item 10 "Radiation Protection Program," under the column **Milestone**, change "...Exempt Qualities..." to "...Exempt Quantities..."
- For item 11 "Non licensed Plant Staff Training Program," under the column **FSAR (SRP) Section**, change 13.2.1 to 13.2.2.
- For item 15 "Cyber Security Program," under the column **FSAR (SRP) Section**, change 13.6 to 13.8.

ANSWER:

Table 13.4-201 has been revised to correct the editorial discrepancies noted above.

Impact on R-COLA

See attached marked-up FSAR Revision 1 pages 13.4-5, 13.4-6, and 13.4-7.

Impact on DCD

None.

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 2, FSAR**

Table 13.4-201

STDCP COL
13.4(1)

CTS-01140

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				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 10 CFR 50, Appendix I, section II and IV	11.5	Receipt of radioactive material on-site	License Condition
	• 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
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 <u>Quantities</u> as described in 10 CFR 30.18) for those elements of the Radiation Protection (RP) Program necessary to support such receipt	License Condition

RCOL_13.04
-1
RCOL2_13.0
4-1 S01
RCOL2_13.0
4-5

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 2, FSAR**

Table 13.4-201

STDCP COL
13.4(1)

CTS-01140

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				Milestone	Requirement
	• <u>Ground Water Monitoring Program</u>	<u>10 CFR 20.1406</u>	<u>12.5</u>	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 <u>Prior to fuel load</u>	<u>License Condition</u>
11.	Non licensed Plant Staff Training Program	10 CFR 50.120 10 CFR 52.78	13.2.42	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 10 CFR 55.41 10 CFR 55.43 10 CFR 55.45	13.2.1	18 months prior to scheduled fuel load	License Condition

RCOL2_13.0
4-1 S01

RCOL2_13.0
4-5

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 2, FSAR**

Table 13.4-201

CTS-01140

STDCP COL
13.4(1)
STD COL 13.6(1)

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				Milestone	Requirement
13.	Reactor Operator Requalification Program	10 CFR 50.34(b) 10 CFR 50.54(i) 10 CFR 55.59	13.2.1	Within 3 months after issuance of an operating license or the date the Commission makes the finding under 10 CFR 52.103(g)	10 CFR 50.54 (i-1)
14.	Emergency Planning	10 CFR 50.47 10 CFR 50, Appendix E	13.3	Full participation exercise conducted within 2 years of scheduled date for initial loading of fuel. Onsite exercise conducted within 1 year before the schedule date for initial loading of fuel. Detailed implementing procedures for emergency planning submitted no less than within 180 days prior to scheduled date for initial loading of fuel.	10 CFR 50, Appendix E.IV.F.2a(ii) 10 CFR 50, Appendix E.IV.F.2a(ii) 10 CFR 50, Appendix E.V.
15.	Security Program • Cyber Security Program • Physical Security Program	10 CFR 50.34(c) 10 CFR 73.54 10 CFR 73.55 10 CFR 73.56 10 CFR 73.57 10 CFR 26	13.6 13.6	Prior to receipt of fuel on-site <u>in the protected area</u> Prior to receipt of fuel on-site <u>in the protected area</u>	License Condition License Condition

RCOL2_13.0
4-5
RCOL2_13.0
6.01-4
CTS-01140
RCOL2_13.0
6.01-4