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-201001532
Log # TXNB-10083

Ref. # 10 CFR 52

November 24, 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. 4682 (SECTION 14.2), 5121 (SECTION 3.7.2), AND 5164 (SECTION 16)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 4682, 5121, and 5164 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAIs involve license conditions, soil-structure interaction, and Technical Specifications, respectively.

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

The only commitment made in this letter involves revising DCD Technical Specifications 5.5.18 and 5.5.19 in the same manner as described in the response to RAI No. 5164. This is being tracked as Regulatory Commitment #8239 and will be included in Revision 3 of the DCD.

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

Executed on November 24, 2010.

Sincerely,

Luminant Generation Company LLC

RD Bruff for
Rafael Flores

Attachments:
1. Response to Request for Additional Information No. 4682 (CP RAI #173)
2. Response to Request for Additional Information No. 5121 (CP RAI #184)
3. Response to Request for Additional Information No. 5164 (CP RAI #186)

D090
NRO

Electronic distribution w/attachments:

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.Conly@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

Luminant Records Management (.pdf files only)

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_mcconaghy@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
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

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.: 4682 (CP RAI #173)

SRP SECTION: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants

QUESTIONS for Quality and Vendor Branch 1 (AP1000/EPR Projects) (CQVP)

DATE OF RAI ISSUE: 8/25/2010

QUESTION NO.: 14.02-19

Consistent with the guidance in RG 1.206, Regulatory Position C.III.4.3, "Combined License Information Items That Cannot Be Resolved Before the Issuance of a License," the applicant identified in Comanche Peak Nuclear Power Plant (CPNPP) Units 3 and 4 FSAR Table 13.4-201, "Operational Programs Required by NRC Regulation and Program Implementation," Item 19, Initial Test Program (ITP) activities that will be subject to a license condition. In addition to the ITP activities identified in Table 13.4-201, the NRC staff has identified the following post-COL items in FSAR Section 14.2.13, "COL Information Items" as license conditions. Accordingly, Luminant is requested to implement these license conditions.

License Conditions for Post Combined License (COL) Items

License Condition for Preoperational and Startup Test Specifications and Procedures, US-APWR DCD Section 14.2.13, COL License Information

During the post-licensing period, preoperational and startup test specification, and test procedures will be subject to a license condition for NRC inspections to verify that the licensee implements the ITP. This process will allow for the performance of necessary plant as-built inspections and walk downs. The licensee will make available to on-site NRC inspectors preoperational and startup test specifications and test procedures 60 days prior to their intended use.

License Condition for Preoperational and Startup Test Specifications and Procedures, US-APWR DCD Section 14.2.13, COL License Information

Prior to initiating the plant's ITP, a site specific startup administration manual (SAM) (procedures), which includes administrative procedures and requirements that govern the activities associated with the plant ITP is to be provided to on-site NRC inspectors.

License Condition for the Power Ascension Test Phase, US-APWR DCD Section 14.2.13, COL License Information, COL Item 14.2,

Certain milestones in the startup testing phase of the ITP (e.g., pre-critical testing, criticality testing and low-power testing) should be controlled through this license condition to ensure that the designated licensee management reviews, evaluates, and approves relevant test results before proceeding to the power ascension test phase. Accordingly, the licensee shall perform the following:

(a) Complete all pre-critical and criticality testing and confirm that the test results are within the range of values predicted in the FSAR acceptance criteria. After completing and evaluating criticality test results, the licensee will conduct low-power tests and will operate the facility at reactor steady-state core power levels not in excess of 5 percent power, in accordance with the conditions of the license.

(b) Complete all low-power testing and confirm that the test results are within the range of values predicted in the acceptance criteria in the facility's FSAR. After completing and evaluating low-power test results, the licensee will conduct power ascension testing and will operate the facility at reactor steady-state core power levels not in excess of 100 percent power, in accordance with the conditions of the license.

The licensee is responsible for the review and evaluation of the adequacy of these test results, as well as final review of overall test results. Test results, which do not meet acceptance criteria, are identified and corrective actions and retests are performed. These results shall be made available to on-site NRC inspectors.

License Condition for the Test Program Schedule, US-APWR DCD Section 14.2.13, COL License Information, COL Item 14.2

Prior to initial fuel load, the licensee shall submit a schedule, no later than 12 months after issuance of the COL, and updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the operational program for the ITP in Comanche Peak Nuclear Power Plant (CPNPP) COL FSAR Table 13.4-201, Item 19, has been fully implemented or the plant has been placed in commercial service, whichever comes first. This schedule shall support implementation details of the ITP and planning for the conduct of NRC inspections of operational programs listed in the operational program CPNPP COL FSAR Table 13.4-201, Item 19.

License Condition for Test Changes

Within one month of any ITP changes described in CPNPP Units 3 and 4 FSAR Section 14.2, the licensee shall evaluate these changes in accordance with the provisions of 10 CFR 50.59 or Section VIII of Appendix A to 10 CFR Part 52 and report them in accordance with 10 CFR 50.59(d).

ANSWER:

Background

The RAI states "the applicant identified in Comanche Peak Nuclear Power Plant (CPNPP) Units 3 and 4 FSAR Table 13.4-201, "Operational Programs Required by NRC Regulation and Program Implementation," Item 19, Initial Test Program (ITP) activities that will be subject to a license condition." FSAR Table 13.4-201, "Operational Programs Required by NRC Regulation and Program Implementation" Item 19 reads:

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				Milestone	Requirement
19	Initial Test Program	10 CFR 50.34 10 CFR 52.79(a)(26)	14.2	Prior to the first construction test for the Construction Test Program Prior to the first preoperational test for the Preoperational Test Program Prior to Initial fuel loading for the Startup Test Program	License Condition

The Initial Test Program is identified on RG 1.206 page C.III.1-60 in Section C.I.13.4, "Operational Program Implementation" and "Sample FSAR Table 13.4-1." 10 CFR 50.34 and 10 CFR 52.79(a)(26) require the FSAR to contain plans for preoperational testing and initial operations. RG 1.206, Section C.IV.4 reads as follows:

C.IV.4 Operational Programs

On October 28, 2005, the NRC staff submitted SECY-05-0197. This paper also included pertinent information from previous Commission papers on operational programs, specifically SECY-02-0067, "Inspections, Tests, Analyses, and Inspection Criteria (ITAAC) for Operational Programs (Programmatic ITAAC)," dated April 5, 2002, and SECY-04-0032, "Programmatic Information Needed for Approval of a Combined License Without Inspections, Tests, Analyses and Acceptance Criteria," dated February 26, 2004. In SECY-05-0197, the NRC staff detailed its plan for reviewing operational programs in a COL application. The Commission approved the NRC staff's plan in the related SRM, dated February 22, 2006. The Commission codified its direction in 10 CFR Part 52 such that COL applicants must fully describe certain operational programs and their implementation in the COL application.

C.IV.4.1 Applicability

Although numerous programs support the operation of a nuclear power plant, SECY-05-0197 focused on those programs that meet the following three criteria:

(1) required by regulation
(2) reviewed in a COL application
(3) inspected to verify program implementation as described in the FSAR

The programs below that meet the above criteria are collectively referred to as "operational programs" and were identified in SECY-05-0197. The provisions of 10 CFR Part 52 address implementation milestones for several of these operational programs. The agency will use license conditions to ensure the implementation of those operational programs with an implementation requirement that NRC regulations do not address. Table 13.4-1 of this guide

provides a summary list of the following operational programs and the sources for their implementation milestones:

- ISI
- radiation protection
- IST
- nonlicensed plant staff training
- environmental qualification
- reactor operator training
- preservice inspection
- reactor operation requalification
- reactor vessel material surveillance
- emergency planning
- preservice testing
- security
- containment leakage rate testing
- QA - operations
- fire protection
- maintenance rule
- process and effluent monitoring and sampling
- motor-operated valve testing
- Initial test

Use of the term "operational programs" in this regulatory guide refers to these specific programs unless otherwise stated. The staff continues to assess whether this list encompasses a complete set of operational programs. The staff might consolidate the operational programs identified above and in SECY-05-0197 in future rulemakings. For example, since the issuance of SECY-05-0197, clarifications in the scope of the operational programs for security have resulted in a reorganization and consolidation of the security programs designated in SECY-05-0197. Table 13.4-1 in Section C.I.13.4 of this guide reflects the reorganization and consolidation of operational programs for security. The vehicle control program, access authorization program, and fitness for duty program are part of the physical security program identified in Table 13.4-1. The weapons training program and weapons qualification and requalification program are part of the training and qualification program identified in Table 13.4-1 of this guide.

C.IV.4.2 Treatment of Operational Programs in COL Applications

In its SRM regarding SECY-05-0197, the Commission endorsed the staff's proposal that an operational program does not require ITAAC in the COL application, provided that the application "fully describes" the program and its implementation. Thus, to avoid the need to propose ITAAC for a given operational program,[1] the COL applicant must fully describe the following:

(1) the operational program
(2) the implementation of the operational program

In the SRM for SECY-04-0032, dated May 14, 2004, the Commission defined "fully described" as follows:

> In this context, "fully described" should be understood to mean that the program is clearly and sufficiently described in terms of scope and level of detail to allow a reasonable assurance finding of acceptability. Required programs should always be described at a functional level and at an increased level of detail where implementation choices could materially and negatively affect the program effectiveness and acceptability.
>
> Toward that end, Section 13.4 of the FSAR should provide a table that lists each operational program, the sections of the FSAR that fully describes the operational program, and the associated implementation milestones...
>
> **C.IV.4.4 Optional Treatment of Operational Programs**
>
> COL applicants may choose to use an operational program although the program is not explicitly required by regulation. For example, a COL applicant might adopt a sump strainer cleanliness program to satisfy the ECCS requirements in the regulations. In such instances, the COL applicant should add the operational program to its list of programs in Section 13.4 of the FSAR and should fully describe the program and its implementation in the FSAR.

The guidance in RG 1.206 clearly requires a License Condition for the operational programs identified. The Luminant COLA addresses operational programs in Table 13.4-201 and Part 10 of the application.

Luminant's Position

The RAI identifies several items and proposes several additional License Conditions related to the ITP for the Luminant COLA. These items are not within the scope of operational programs as discussed above. Per RG 1.206 and ISG-015, these items do not meet guidance criteria for a license condition (e.g., operational restrictions for the facility, restrictions on operating power levels, the performance of special tests, operational constraints associated with implementation of specific design features). The items are not necessary to make a finding required for license issuance. The items (1) do request licensee plans and procedures, (2) establish schedules to provide the information, and (3) request schedule information regarding the licensee's activities – all to facilitate NRC inspection activities. These items are inconsistent with NRC guidance in RG 1.206, RG 1.68 and SRP Section 14.2.

As such, Luminant believes the appropriate way to establish these items on the CPNPP Units 3 and 4 docket is either as Regulatory Commitments provided by letter or to include them in the CPNPP FSAR. Either approach is acceptable to Luminant. Refer to Table 1 below.

Impact on R-COLA

None.

Impact on DCD

None.

Table 1

Item	Request	Response
Preoperational test specifications	Make available to NRC inspectors 60 days prior to use	DCD Subsection 14.2.11 and 14.2.12.1 make this commitment
Startup test specifications	Make available to NRC inspectors 60 days prior to use	DCD Subsection 14.2.11 makes this commitment
Preoperational test procedures	Make available to NRC inspectors 60 days prior to use	FSAR Subsection 14.2.3 and DCD Subsection 14.2.11 make this commitment
Startup test procedures	Make available to NRC inspectors 60 days prior to use	FSAR Subsection 14.2.3 and DCD Subsection 14.2.11 make this commitment
Startup administration manual (SAM) (procedures)	Provide to on-site NRC inspectors	CPNPP could make a commitment or FSAR change however, both seem unnecessary as this is standard procedure, already included in NRC guidance, and normal practice as part of the interaction with the on-site inspectors.

Item	Request	Response
Power Ascension Test Phase	Certain milestones in the startup testing phase of the ITP (e.g., pre-critical testing, criticality testing and low-power testing) should be controlled through this license condition to ensure that the designated licensee management reviews, evaluates, and approves relevant test results before proceeding to the power ascension test phase. Accordingly, the licensee shall perform the following: (a) Complete all pre-critical and criticality testing and confirm that the test results are within the range of values predicted in the FSAR acceptance criteria. After completing and evaluating criticality test results, the licensee will conduct low-power tests and will operate the facility at reactor steady-state core power levels not in excess of 5 percent power, in accordance with the conditions of the license. (b) Complete all low-power testing and confirm that the test results are within the range of values predicted in the acceptance criteria in the facility's FSAR. After completing and evaluating low-power test results, the licensee will conduct power ascension testing and will operate the facility at reactor steady-state core power levels not in excess of 100 percent power, in accordance with the conditions of the license. The licensee is responsible for the review and evaluation of the adequacy of these test results, as well as final review of overall test results. Test results, which do not meet acceptance criteria, are identified and corrective actions and retests are performed. These results shall be made available to on-site NRC inspectors.	Although some of these concepts are found in DCD Subsection 14.2.5, the details belong in the licensee's manuals and procedures rather than the FSAR or a commitment. DCD 14.2.11 says that power ascension procedures are provided 60 days before fuel load.

Item	Request	Response
Test Program Schedule	Prior to initial fuel load, the licensee shall submit a schedule, no later than 12 months after issuance of the COL, and updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the operational program for the ITP in Comanche Peak Nuclear Power Plant (CPNPP) COL FSAR Table 13.4-201, Item 19, has been fully implemented or the plant has been placed in commercial service, whichever comes first. This schedule shall support implementation details of the ITP and planning for the conduct of NRC inspections of operational programs listed in the operational program CPNPP COL FSAR Table 13.4-201, Item 19	The first part of this item is similar to the ITAAC requirements in 10 CFR 52.99(a). While such detailed instructions and reporting may be appropriate for ITAAC, this type of information is exchanged with the NRC inspectors on an ongoing basis. Currently FSAR Subsection 14.2.11 commits to providing an "event-based schedule…relative to the start of fuel loading…to the NRC six months prior to the start of preoperational testing." Neither a further commitment nor FSAR update is appropriate as they would create unnecessary bureaucracy that would not enhance the inspection process but would put an unnecessary burden on the licensee.
Test Changes	Within one month of any ITP changes described in CPNPP Units 3 and 4 FSAR Section 14.2, the licensee shall evaluate these changes in accordance with the provisions of 10 CFR 50.59 or Section VIII of Appendix A to 10 CFR Part 52 and report them in accordance with 10 CFR 50.59(d)	This item requires compliance with the regulations. Both DCD 14.2.11 and RG 1.206 Section C.I.14.2.11 indicate "timely" notification to the NRC of procedure changes. This is probably the source of the "within one month" provided in the RAI. Neither a commitment nor an FSAR update is required.

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.: 5121 (CP RAI #184)

SRP SECTION: 03.07.02 - Seismic System Analysis

QUESTIONS for Structural Engineering Branch 1 (AP1000/EPR Projects) (SEB1)

DATE OF RAI ISSUE: 10/25/2010

QUESTION NO.: 03.07.02-18

This request for additional information (RAI) is necessary for the staff to determine if the application meets the requirements of 10 CFR Part 50, Appendix A, General Design Criteria 2; 10 CFR Part 50 Appendix S; and 10 CFR Part 100; as well as the guidance in NUREG-0800, 'Standard Review Plan (SRP) for the Review of Safety Analysis for Nuclear Power Plants,' Chapter 3.7.2, 'Seismic Design Parameters.'

According to Comanche Peak COL Part 2 FSAR Appendices 3LL, 3MM, and 3NN, the soil structure interaction (SSI) analyses reported were performed using computer program ACS SASSI Version 2.2. Version 2.2.1 of ACS SASSI is subject to a 10 CFR Part 21.21 report regarding numerical instabilities that may occur with high numbers of soil layers even though the properties and number of layers are within the parameters stated in the User's Manual. In order for the staff to complete the evaluation of the SSI analysis, the applicant is requested to provide additional information demonstrating that the SSI results are valid and meet the guidelines of SRP 3.7.2.II.4

ANSWER:

Version 2.2.1 of ACS SASSI was used to perform the soil structure interaction analyses for CPNPP Units 3 and 4. The ACS SASSI Version 2.2.1 Software Error Notification (SEN-01-2009) issued by the software vendor, Ghiocel Predicative Technologies, Inc., was evaluated per the requirements of the project Quality Assurance Program. As noted in the Software Error Notification, Ghiocel performed an intensive in-house investigation on the cause of the error and concluded there was a numerical malfunction that was expressed by a numerical instability in SSI results. Ghiocel stated that

> "...this specific numerical malfunction was only noted in an extreme condition of soil layering modeling when a very large number of soil layers, specifically, more that 80 layers, were used to model a deep soft deposit with a non-uniform property variation with depth."

Review of the site-specific soil conditions and the SSI analyses confirmed that neither of these error conditions is applicable to CPNPP Units 3 and 4. This is a rock site and no more than 45 soil layers were used in each of the SSI models. It was concluded that the error condition described in the SEN-01-2009 had no impact on the completed SSI analyses as documented in FSAR Appendices 3KK (which also

described analyses using SASSI), 3LL, 3MM, and 3NN, which remain valid and meet the guidelines of SRP 3.7.2.II.4.

Impact on R-COLA

None.

Impact on DCD

None.

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.: 5164 (CP RAI #186)

SRP SECTION: 16 - Technical Specifications

QUESTIONS for Technical Specification Branch (CTSB)

DATE OF RAI ISSUE: 10/25/2010

QUESTION NO.: 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.'

ANSWER:

(1) Luminant understands the NRC staff's position that if a COL applicant chooses to adopt RITS Initiative 4a and 5b, the NRC staff must review and approve plant-specific changes to the current revisions of NEI 06-09 and NEI 04-10 prior to issuance of a COL. Additionally, Luminant understands the staff's position that the process (methodology) for preparing the supporting PRA for RMTS initiatives must be established at the issuance of the COL. CPNPP Units 3 and 4 TS 5.5.18 and 5.5.19 have been revised to reference potential future revisions of NEI 06-09 and NEI 04-10 and supplemental documentation. These changes have been included in brackets, indicating they will be modified in the future when the appropriate revisions of the NEI documents have been determined and the supplemental documentation is developed for NRC staff review.

(2) Luminant understands the NRC staff's intention to keep acceptance of TS 5.5.18 and 5.5.19 for the Comanche Peak Nuclear Power Plant COL as open items.

(3) CPNPP Units 3 and 4 TS 5.5.18 has been revised as requested.

Impact on R-COLA

See attached marked-up Technical Specifications (COLA Part 4) Revision 1 pages 5.5-17 and 5.5-18.

Impact on DCD

The same changes will be made to US-APWR DCD Chapter 16 in Revision 3.

5.5.17 Battery Monitoring and Maintenance Program

This Program provides for battery restoration and maintenance, based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer including the following:

a. Actions to restore battery cells with float voltage < 2.13 V, and

b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit.

5.5.18 Configuration Risk Management Program (CRMP)

This program provides controls for Completion Times. The program shall ensure that the assessment of configuration-specific risk to support the extension of Completion Times, and reassessment of configuration changes, and implementation of compensatory measures and actions at the appropriate risk thresholds are performed sufficient to assure the associated Limiting Conditions for Operation are met.

a. When entering into this specification, the following actions shall be taken in accordance with ~~NEI 06-09 (Revision 0), "Risk Managed Technical Specifications (RMTS) Guidelines."~~[NEI 06-09 (Revision y), "Risk Managed Technical Specifications (RMTS) Guidelines" and supplemental documentation]." | RCOL2_16-2 0

1. Within the completion time of the referencing specification determine that the plant configuration is acceptable beyond the completion time,

AND

2. Calculate the Risk-Informed Completion Time (RICT),

AND

3. Restore required subsystems or components to operable status within the RICT or 30 days, whichever is less.

OR

Take the ACTIONs required in the referencing specification for the required action and associated completion time not met.

b. The RICT shall be recalculated whenever plant configuration change occurs ~~within 12 hours from the configuration change~~, in accordance with NEI 06-09. | RCOL2_16-2 0

5.5.18 Configuration Risk Management Program (CRMP) (continued)

c. This program shall satisfy all the requirements specified in NEI 06-09 including, but not limited to, the following:

1. Station procedure of the CRMP process with specifying the station functional organizations and personnel responsible for each action of CRMP implementation,

2. Training of responsible personnel,

3. PRA model to meet the technical adequacy requirements of NEI 06-09, [and supplementary documentation on PRA development] RCOL2_16-2 0

4. Appropriate CRM tool.

5.5.19 Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.

b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with ~~NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.~~[NEI 04-10 (Revision z), "Risk-Informed Method for Control of Surveillance Frequencies" and supplemental documentation]. RCOL2_16-2 0

c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.