

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Wednesday, January 05, 2011 2:12 PM
To: John.Only@luminant.com; Donald.Woodlan@luminant.com
Cc: ComanchePeakCOL Resource
Subject: Comanche Peak COL List of Regulatory Commitments
Attachments: LICENSE CONDITIONS and regulatory commitments list.docx

I have updated my list of regulatory commitments. Please review and provide me with your feedback.

Thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

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From: Monarque, Stephen

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LIST OF LICENSE CONDITIONS

FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 3 AND 4

1. By letter dated May 1, 2009 ML091250488, Luminant in response to RAI #2 (2317) for FSAR section 5.3.2, stated "in order to ensure timely NRC review of PTS evaluation using the as-procured reactor vessel material properties, the evaluation will be provided within 12 months after acceptance of RV. This commitment will be included as part of the proposed license condition, Table 13.4-201, item 5."

In response to a follow-up RAI 8 (2353), Luminant deleted the phrase 'This commitment will be included as part of the proposed license condition, Table 13.4-201, item 5.' And will submit this license condition in COLA part 10, Inspections, tests, Analyses and acceptance criteria and proposed license conditions.

LIST OF REGULATORY COMMITMENTS

FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 3 AND 4

1. By letter dated April 21, 2009, Luminant provided conditions for using the online reference portal. (ML091120717)

Number

5751

Commitment

Luminant confirms that the conditions listed in the referenced NRC letter will be maintained throughout the duration of the CPNPP COL application review process for as long as the electronic room is available to NRC reviewers.

Due Date/Event

Ongoing

2. By letter dated May 1, 2009, Luminant provided responses to requests for additional information No 2317 and 2332. (ML091250488)

Number

5761

Commitment

In order to enable timely NRC review of the pressurized thermal shock (PTS) evaluation using the as-procured reactor vessel material properties, the evaluation will be provided within 12 months after acceptance of the reactor vessel. This commitment will be included as part of the proposed license condition in Table 13.4-201, item 5.

Due Date/Event

This commitment will be implemented prior to initial criticality.

3. By letter dated October 29, 2010 Luminant provided Mitgative Strategies Report Revision 1. This letter provided additional commitments and listed those commitements that have been deleted.

~~Number _____ Commitment _____~~

~~5911 _____ Training will be performed for fire brigade personnel in large area accelerant fed fires.~~

~~Commitment Due Date/Event~~

~~Commitment deleted duplicate of 5901.~~

~~Number _____ Commitment _____~~

~~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.~~

~~Commitment Due Date/Event~~

~~Commitment deleted~~

4. By letter dated June 17, 2009, Luminant provided responses to request for additional information No 2614. (ML091740112)

Number

6101

Commitment

Inservice Inspection: The COL applicant is to establish a turbine maintenance and inspection procedure prior to fuel load.

Due Date/Event

This commitment will be implemented prior to fuel load.

5. In response to staff's RAI 8 (2353), on August 7, 2009, Luminant to provide regulatory commitment to FSAR 5.3.2.

<u>Number</u>	<u>Commitment</u>	<u>Due Date</u>
6231	The COL holder will update the P/T limits prior to fuel loading using PTLR methodologies approved in the USAPWR DCD and the plant Specific material properties and inform the NRC of the updated P/T limits as required by the CPNPP 3 and 4 technical specifications.	prior to initial fuel load

6. In response to the staff RAI 7 (2513), on August 7, 2009, Luminant to provide a regulatory commitment to FSAR Table 1.8-201, revise COL 10.3(1), and revise FSAR, Revision 0, pages 10.3-1, 10.3-2, and 10.3-3 (FSAR section 10.3.6.3.1) to reflect this commitment

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6241	the flow accelerated corrosion (FAC) monitoring program will be established	prior to initial fuel load

7. By letter dated September 22, 2009, Luminant provided responses to requests for additional information No 2730, 2737, 3287. (ML092670160)

Number

6451

Commitment

The PRA for RMTS will be updated to satisfy the PRA technical adequacy described in the NEI guidelines and will be available one year prior to fuel load.

Due Date/Event

One year prior to fuel load

8. TXMB-09048, dated September 24, 2009 ML092720676

Number

Commitment

6481

Plant high confidence of low probability of failure (HCLPF) values for the plant specific SSCs such as cooling towers, will be confirmed with a calculation using EPRI TR-103959 methodology after completion of seismic design and stress analysis of the SSCs.

Commitment Due Date/Event

Mid 2010

Revised Commitment Due Date/Event

March 31, 2011 – By letter dated May 24, 2010, ML101460210, Luminant revised this date. since the seismic design and stress analysis will not be completed until the end of 2010, followed by the HCLPF calculations by the end of March 2011.

9. TXMB-09048, dated September 24, 2009 ML092720676

<u>Number</u>	<u>Commitment</u>
6491	When the seismic margin analysis for the design certification is available, we will confirm that the analysis envelopes the plant specific design.

Commitment Due Date/Event

Mid 2010

Revised Commitment Due Date/Event

March 31, 2011 – By letter dated May 24, 2010, ML101460210, Luminant revised this date. Since the seismic design and stress analysis will not be completed until the end of 2010, followed by the seismic margin analysis by the end of March 2011.

10. On October 19, 2009, Luminant provided its response to staff's RAIs 2749, 2751, 2758, 2760, 2795, 2970, 2971, 3033, 3225, 3398, 3401, 3402, 2556, and 3557.

<u>Number</u>	<u>Commitment</u>
6521	the details of the requested information will be submitted with the procedure generation package for the EOPs that will be submitted to the NRC at least 3 months prior to the start of formal operator training on the EOPs. The PGP will include detailed information on the following (a) a description of the process used to develop plant specific technical guidelines (P-STGs) from the USAPWR generic technical guidelines, (b) identification of (safety) significant deviations from the generic guidelines, including the identification of additional equipment beyond that identified in the generic technical guidelines, and engineering evaluations or analyses as necessary to support the adequacy of each deviation, and (c) in accordance with the human factors program (FSAR Section 18.8), a description of the process used to identify operator information and control requirements.

Commitment Due Date/Event

3 months prior to start of formal operator training

<u>Number</u>	<u>Commitment</u>
6531	Specific sample points will be located during detailed design and will ensure that representative samples of the pond are taken before the contents are transferred To the Squaw Creek Reservoir via the CPNPP Units 1 and 2 circulating water return line.

Commitment Due Date/Event

Detailed design

<u>Number</u>	<u>Commitment</u>
6541	The [interim radioactive waste] building will be designed in accordance with the applicable regulatory requirements and NRC/industry guidance referenced in FSAR Subsection 11.4.2.3.

Commitment Due Date/Event

Detailed design

11. In response to the NRC staff's RAI 52 (3294) on October 21, 2009, Luminant provided a regulatory commitment to FSAR 9.1.5 to reflect this commitment.

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6551	<p>A heavy load handling program, including associated procedural load and administrative controls, will be established prior to fuel load and will address the following attributes consistent with the standard and regulatory guidance identified in revised FSAR section 9.1.5:</p> <p>A listing of all heavy loads and heavy load handling equipment outside the scope of loads described in the referenced certified design and the associated heavy load attributes (load weight and typical load path)</p> <p>Heavy load handling safe load paths and routing plans including descriptions of automatic and manual interlocks and safety devices and procedures to assure safe load path compliance</p> <p>Heavy load handling equipment maintenance manuals and procedures Heavy load handling equipment inspection and test plans Heavy load handling personnel qualifications, training, and control programs</p> <p>Quality assurance (QA) programs to monitor, implement, and ensure compliance with the heavy load handling program.</p>	prior to fuel

12. By letter dated October 26, 2009, in response to the Staff's RAIs 54-59, Luminant provided the following regulatory commitments.

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6561	Luminant confirms that alternate methods for verification of Valve position indicator operation, and the justification, that Are incorporated into the IST program will be made available Consistent with the implementation schedule for the IST program to provide for timely review during NRC inspection of the IST program prior to plant operation. Alternate methods for verification of valve position indicator operation, if necessary, will meet requirements of ASME OM Code ISTC-3700.	prior to commercial service

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6571	Luminant will transition the activities for the NuBuild project To the QAP Document based on NQA-1, RG 1.8, RG 1.28, And RG 1.33 sometime during the construction of CPNPP Units 3 and 4. The transition will be complete no later than 30 days before fuel load of CPNPP, Unit 3.	No later than 30 days prior to Unit 3 fuel load

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6581	Site-specific operational procedures for CPNPP units 3 and 4 will be developed during the transition as they are needed. In particular, procedures for radioactive effluents, analytical Procedures, instrument calibration and regulated records will be developed before Unit 3 fuel load which will comply with the CPNPP 3 and 4 QAPD, NQA-1 and relevant NRC RGs as discussed in the COLA.	No later than 30 days prior to Unit 3 fuel load

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6431	The plan for the CPNPP Units 3 and 4 seismic qualification program will be provided in MUAP-08015, revision 1, by the end of October 2009	Dec 31, 2009 (revised from October 30, 2009)

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6591	Luminant commits to submit a schedule to the NRC that supports the planning and conduct of NRC inspections of operational programs, including the IST program, no later than 12 months after issuance of the COL or at the start of construction as defined in 10 CFR 50.10a, whichever is later. This is similar to the approach for the ITAAC schedule required in 10 CFR 52.99(a).	12 months after COL or at start of construction, whichever is later

13. By letter dated November 5, 2009, Luminant provided its response to the staff's RAIs 27557, 2819, 2836, 2837, and 3592.

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6601	Luminant does plan to hare resources between the proposed CPNPP Units 3 and 4 and the existing CPNPP U 1 and 2 at the Comanche peak site. The plans for resources sharing are not yet matured, but will be provided to the NRC 18 months prior to Unit 3 fuel load. The plan will include sharing of personnel between the units, a description of their duties, and proportion of their time that they may routinely be assigned between the units.	18 months prior to U 3 fuel load

<u>Number</u>	<u>Commitment</u>	<u>Due date</u>
6611	In addition, the training program will be accredited prior to fuel load or within the time frame established by INPO and the operating company senior management using the guidance provided by ACAD 08-001, "The Process for Initial Accreditation of Training in the Nuclear Power Industry."	Prior to fuel load

14. By letter dated November 11, 2009, Luminant provided its response to staff's RAIs 3113, 3315, 3319, 3511, 3674, 3675, 3677, 3705, 3729, 3790, and 3834.

Number

Commitment

6631 With regard to the application of more recent guidance for PRA-based SMA methodology as applicable to the site specific features of the COLA, Luminant plans to revise the COLA to incorporate the EPRI TR-1002988, "Seismic Fragility Application Guide" in response to the draft ISG-20, which is expected to prescribe detailed items that should be included in the FSAR. EPRI TR-1002989, "Seismic PRA Implementation Guide," may also be incorporated into the FSAR.

Due Date

COLA Revision 2

Revised Commitment Due Date/Event

March 31, 2011 – By letter dated May 24, 2010, ML101460210, Luminant revised this date. Since the seismic design and stress analysis will not be completed until the end of 2010, followed by the seismic margin analysis by the end of March 2011.

Number

Commitment

6641 Luminant will revise the FSAR to include a description of the site specific SMA results, including makeup water and seismically driven common failure mode considerations for the UHS mechanical draft cooling towers, in response to ISG-20.

Due Date

COLA revision 2

Revised Commitment Due Date/Event

March 31, 2011 – By letter dated May 24, 2010, ML101460210, Luminant revised this date. Since the seismic design and stress analysis will not be completed until the end of 2010, followed by the seismic margin analysis by the end of March 2011.

Number Commitment

6651 In accordance with the changes to the DCD, CPNPP, Units 3 and 4 plant specific TS will use ISG option 3 as proposed in DC/COL-ISG-8, with the reference to USAPWR Technical report MUAP-09022 (NRC approved version)

Due Date

COLA revision 2

Number Commitment

~~6661 The response to RAI 3698 (RAI # 109) question 09.02.01-1 will provide the calculation of available NPSH and will provide changes to FSAR subsection 9.2.5 regarding required ESW pump NPSH during the 30 day period following a LOCA.~~

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

15. By letter dated November 12, 2009, Luminant provided its response to staff's RAIs 3105, 3327, and 3451.

No. Commitment

~~6671 A proposed license condition will be included in a future revision to Part 10 of the COLA.~~

~~_____ Due Date~~

~~_____ November 19, 2009~~

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

16. By letter dated November 13, 2009, Luminant provided its response to RAIs 2736, 2840, 2996, 3293, 3366, and 3532. Supplemental letter dated January 13, 2010 Luminant revised due date for commitment 6711 from 'January 13, 2010' to 'when NRC approves of final version of NEI 06-14A.'

<u>Number</u>	<u>Commitment</u>
6681	This transition [to the CPNPP 3 and 4 QAPD] will be complete no later than 30 days before fuel load for CPNPP Unit 3.

Due Date/event

30 days prior to Unit 3 fuel load

<u>Number</u>	<u>Commitment</u>
6691	RG listed in COLA FSAR Table 1.9-201 that are not in the CPNPP 1 and 2 QAP will be included as part of contract requirements for companies performing COLA work.

Due Date/event

Ongoing

<u>Number</u>	<u>Commitment</u>
6711	RG 1.8, RG 1.28, and RG 1.33 have been added to Revision 1 of the QAPD, but the following exceptions not listed in Revision 1 are to be taken by Luminant. These exceptions will be incorporated into an update of the CPNPP 3 and 4 QAPD.

Due Date/event

~~When NRC approves of final version of NEI 06-14A.~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory commitment 6711.

<u>Number</u>	<u>Commitment</u>
6721	Although this response [to CP RAI #83 Question 14.03.07-28] addresses the question asked, Luminant commits to revise the ITAAC by December 10, 2009 to include a description for each system in the COLA ITAAC to be consistent with DCD Tier 1 system descriptions.

Due Date/event

~~December 10, 2009~~

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

17. By letter dated November 16, 2009, Luminant provided its response to staff's RAIs 3316, 3318, 3510, and 3673.

No. Commitment

~~6731 Once NEI 07-08 is approved by the NRC, FSAR chapter 12 referenced sections will be revised to reflect the approved version NEI 07-08A and differences, if any, will be addressed.~~

~~_____ Due Date~~

~~_____ June 30, 2010~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory commitment 6731.

Number Commitment

~~6741 Once NEI 08-08 is approved by the NRC, FSAR chapter 12 referenced sections will be revised to reflect the approved version NEI 08-08 and all differences, if any, will be addressed.~~

~~_____ Due Date~~

~~_____ June 30, 2010~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory commitment 6741.

18. By letter dated November 16, 2009, Luminant provided its response to the staff's RAI 3183.

No. Commitment

~~6751 proposed revisions to the ETE report require review by state and local governments prior to implementation. The revised ETE will be submitted to state and local Governments for final review and certification, and will be submitted to NRC Following certification.~~

~~_____ Due date~~

~~_____ June 30, 2010~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory Commitment 6751.

19. By letter dated November 20, 2009, Luminant provided its response to RAIs 2828 and 3698.

No. Commitment

6801 FSAR figure 9.5.1-201 will be revised to show the fire protection water supply system interface with ESWS

Due Date

February 23, 2010

20. By letter dated November 18, 2009, Luminant submitted its response to staff's RAI 2864, 3295, and 3327.

Number Commitment

~~6761 CPNPP EALs provided in Appendix 1 of the Emergency Plan will be updated to include current US APWR design information and to indicate the differences and deviations (to NEI 99-01, Revision 5) currently known to Luminant.~~

Due Date/Event

~~COLA Revision 2~~

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

Number Commitment

6771 As discussed in Critical Element 2, the fully developed site-specific EAL scheme will be incorporated into Appendix 1 of the Emergency Plan. Accordingly, future changes to the EAL scheme will require an evaluation under 10 CFR 50.54(q) to determine if these changes will reduce the effectiveness of the Emergency Plan.

Due Date/Event

At least 180 days prior to initial fuel load

Number Commitment

6781 The existing EOF will be modified to include Units 3 and 4 data displays described in the US-APWR DCD.

Due Date/Event

Prior to implementation of Emergency plan

21. By letter dated November 24, 2009, Luminant submitted its response to staff's RAI 2879.

Number _____ Commitment

~~6811~~ _____ ~~The COLA FSAR will be revised to incorporate as necessary the results of the MHI SSI analyses.~~

Due Date/Event

~~COLA Revision 2~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory Commitment 6811.

Number _____ Commitment

~~6821~~ _____ ~~The site specific SSI analyses of the R/B will be revised to address the changes in the building basement configuration and design enhancements. The FSAR will be revised in COLA Revision 2 to include the SSI analyses that will provide SASSI calculated dynamic earth pressures for direct comparison. FSAR Sections 3.7 and 3.8 and Appendix 3NN will be revised in the next COLA revision to address the basemat configuration and design embedments and to provide SASSI calculated dynamic earth pressures.~~

Due Date/Event

~~COLA Revision 2~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory Commitment 6821.

6831' Because of the large ratio of the standard plant input motion versus the site-specific input motion, the assumptions for the standard plant design of the A/B and T/B were considered to envelope the critical responses of the non-uniform site-specific soil column profiles, and were not validated by performing site-specific SSI analyses. SSI analyses for A/B and T/B in generic standard soil input will be performed by May 2010.

Due Date/Event

May 2010

Revised Commitment Due Date/Event

January 31, 2011 – By letter dated May 24, 2010, ML101460210, Luminant revised this date. Since the SSI analysis for seismic category 2 buildings has been rescheduled to be completed by December 31, 2010.

22. By letter dated December 10, 2009, Luminant provided its response to staff's RAI 2994.

Number Commitment

6871 the response to RAI 3006 question 3.8.4-52, to be submitted no later than December 21, 2009, provides further discussion on the testing methods of the engineered backfill for CPNPP, Units 3 and 4

Due Date/Event

December 21, 2009

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

Number Commitment

6881 The description of this equivalent time travel method will be added to FASR sections 3NN.2 and 3NN.3 in the response to RAI 3006 (CP RAI 122) question 03.08.04-53 to be submitted to the NRC no later than December 21, 2009.

Due Date/Event

December 21, 2009

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

23. By letter dated December 16, 2009 Luminant submitted its responses to RAIs 3232 and 3762.

Number Commitment

6891 FSAR figure 3.8-206 and related chapter 3 figures will be revised in a future FSAR UTR as the detailed ESW and transfer pump room ventilation design and equipment layout progresses.

6901 The ESW transfer pump room flooding event evaluation will be described in a new FSAR subsection 3.4.1.5.3 and the details of the floor drain and sill design will be shown in FSAR figure 3.8-209 or related section 3.8 figures in a future UTR. FSAR subsection 9.4.5.3.6 will also be revised to reflect the new flooding related FSAR information.

Due Date/Event

Future UTR

24. By letter dated February 19, 2010, Luminant provided its response to RAIs 127, 128, and RAI 10.

Number Commitment

7201 ~~DCD Tier 2 subsections 9.5.1.1 will be revised to address deviations from the NFPA codes and standards as identified in RG 1.189 Regulatory position 1.8.6 and FSAR 9.5.1-1R. Revision to DCD Tier 2 subsection 9.5.1.1 will be provided in an upcoming DCD UTR.~~

Due Date/Event

~~April 30, 2010~~

By letter dated April 20, 2010 TXNB-10033, this above commitment was completed.

25. By letter March 5, 2010, Luminant provided its response to RAIs 135, and supplemental response to RAI 97.

Number Commitment

7221 ~~site specific design considerations for compliance with RG 4.21 will be added in FSAR chapter 12. This RAI response will be revised to incorporate the changes by end of May 2010.~~

Due Date/Event

~~May 31, 2010~~

Number Commitment

7231 ~~subsection 12.3.1 will be added to the DCD to delineate the design features incorporated into the USAPWR. This section will identify the design features discussed in RG 4.21 and where these features are specifically discussed in the DCD. The changes will be provided in MHI letter to NRC by end of May 2010.~~

Due Date/Event

~~May 31, 2010~~

By letter dated June 29, 2010, Luminant revised the commitments dates for 7221 and 7231 from May 31, 2010 to June 30, 2010.

By letter dated October 29, 2010, Luminant informed the NRC staff that it had completed 7221 and 7231.

26. By letter dated April 5, 2010, Luminant provided its response to RAIs 149 and 150.

<u>Number</u>	<u>Commitment</u>
7351	The first sentence in the third paragraph of DCD subsection 3.3.2.3 will be corrected in the next revision of the DCD to delete 'including loss of its siding' for the AC/B.

Due Date/Event

DCD Revision 3

27. By letter dated April 12, 2010, Luminant submitted security changes due to the opening of Squaw creek Reservoir.

<u>Number</u>	<u>Commitment</u>
7381	include SCR change in the next revision of the physical security plan.

Due Date/Event

COLA Revision 2

28. By letter dated April 20, 2010, Luminant provided its response to RAIs 143 and 144.

<u>Number</u>	<u>Commitment</u>
7391	Calculation packages 011 and 012 are currently under revision in response to questions 2.4.3-5, 2.4.3-7, 2.4.3-8, and 2.4.3-10. Calculation package 015 is currently under revision in response to RAI No 4311 (CP # 140) questions 2.4.4-6 and 7. The revised calculation packages will be submitted upon completion.

Due Date/Event

~~December 20, 2010~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory Commitment 7391.

29. By letter dated May 18, 2010, Luminant provided its response to RAI 152.

<u>Number</u>	<u>Commitment</u>
7431	periodic testing of cable insulation for underground (including medium voltage) cable within the scope of the maintenance rule (10 CFR 50.65) is conducted IAW established industry guidance to detect potential degradation from moisture intrusion. A cable monitoring program that includes methods for cable selection, test methods, and test frequencies will be implemented prior to fuel load authorization.

Due Date/Event

Fuel load authorization

30. By letter dated June 10, 2010, Luminant provided its response to COLA Part 1 RAIs.

<u>Number</u>	<u>Commitment</u>
7501	Question 2a. The tables presenting this financial data will be updated in future Updated Tracking Report.

Due Date/Event

~~June 30, 2010~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory Commitment 7501.

<u>Number</u>	<u>Commitment</u>
7511	Question 5a. These changes regarding the citizenship of the representative Group members will be incorporated in and a markup will be provided with the Updated Tracking Report for an update to the tables in Part 1.

Due Date/Event

~~June 30, 2010~~

By letter dated July 28, 2010, Luminant informed the NRC staff that it had completed regulatory Commitment 7511.

31. By letter dated June 24, 2010, Luminant provided its response to COLA RAIs 4585

<u>Number</u>	<u>Commitment</u>
7531	UAP-SGI-08002, high assurance evaluation assessment will be revised as slated in response to questions 13.06.01-25, 27, 28, 33, 34, and 35.

Due Date/Event

December 31, 2010

<u>Number</u>	<u>Commitment</u>
7541	question 13.06.01-35, DCD subsection 13.6.2.6 will be revised to provide consistency in use of backup and standby power.

Due Date/Event

Next DCD revision

<u>Number</u>	<u>Commitment</u>
7551	question 13.06.01-4, Luminant confirms 10 CFR 74.19 record keeping requirements will be fully implemented for possession and storage of category III SNM prior to receipt of fuel onsite for CPNPP Units 3 and 4 in the protected area.

Due Date/Event

Prior to receipt of fuel in protected area

<u>Number</u>	<u>Commitment</u>
7561	security plan will be revised as stated in response to questions 13.06.01-14, 15, 16, 19, 20-23, 26, 29, 30, 35, 36, 41, 45-47, 50, and 51

Due Date/Event

Next COLA revision

<u>Number</u>	<u>Commitment</u>
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7571 (question 13.06.01-27), UAP-SGI-10003, revision 0, will be revised to clearly indicate that waterborne threat is encompasses in analysis.

Due Date/Event

December 31, 2010

32. By letter dated June 25, 2010, Luminant provided its response to COLA RAIs 4607, 4613, 4681, and 4712.

Number Commitment

~~7581 (RAI CP # 164 Question 14.02-18) Similar changes to table 1.9-201 will be made for other RGs not associated with Section 14.2 in a future FSAR update tracking report.~~

Due Date/Event

~~Future FSAR UTR~~

By letter dated October 29, 2010, Luminant informed the NRC staff that it had completed 7581.

33. By letter dated September 22, 2010, Luminant provided its response to COLA RAI 4206.

Number Commitment

7801 In the next revision of the DCD docuent currently scheduled for march 2011, subsection 9.1.3.2.1.3 will be revised to include the operating experience discussed in EPRI TR 1013470.

Due Date/Event

March 30, 2011

34. By letter dated September 29, 2010, Luminant provided supplemental response to RAI 3592, 4606, and 4607.

Number _____ Commitment

7781 _____ This response to question 2.5.4-22 will be supplemented with figures to provide additional information regarding excavations, fills, and slopes for category 1 structures.

Due Date/Event

October 25, 2010

Number _____ Commitment

7811 _____ Luminant is determining if there are other necessary changes to the FSAR resulting from the response to this question, CP RAI 155, question 2.3.1-6. Any additional FSAR changes will be submitted as a supplement to this response no later than October 29, 2010.

By letter dated October 29, 2010, Luminant informed the NRC staff that it had completed 7781 and 7811.

35. By letter dated November 8, 2010, Luminant submitted supplemental responses to RAIs 2818 and 2819. In this same letter, Luminant stated that it had completed Regulatory Commitment 8131 made in a letter TXNB-10073, dated October 21, 2010.

36. By letter dated October 25, 2010 Luminant provided a reply to notice of violation 05200034(350/2010-201-01. (ML102990430)

Number _____ Commitment

8151 _____ MNES will revise procedure QAP-GEN-7.5 to provide enhanced instructions to inform all affected organizations when a supplier deviation report is issued and also to ensure timely corrective action.

Due Date/Event

December 31, 2010

37. By letter dated October 29, 2010 Luminant provided Mitgative Strategies Report Revision 1. This letter provided additional commitments and listed those commitments that have been deleted.

<u>Number</u>	<u>Commitment</u>
8191	Site procedures and guidelines address dosiemetry for offsite responders, including estimates for quantities, the process for distribution and the process for acquiring additional dosimetry resources. These procedures will be revised and updated to incorporate Units 3 and 4.

Due Date/Event

Six months prior to fuel load

<u>Number</u>	<u>Commitment</u>
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 and 4 using performance based evaluations.

Due Date/Event

Six months prior to fuel load

<u>Number</u>	<u>Commitment</u>
8211	CPNPP 3 and 4 Guidance will contain requirements to maintain radios at multiple locations and have sufficient chargers and batteries.

Due Date/Event

Six months prior to fuel load

<u>Number</u>	<u>Commitment</u>
8221	These emergency plan procedures have been evaluated and found to be adequate for projecting doses for offiste exposure for CPNPP 3 and 4 and will be revised to include CPNPP 3 and 4.

Due Date/Event

Six months prior to fuel load

38. By letter dated November 24, 2010, Luminant provided response to RAIs 173, 184, and 186. This letter provided commitment no. 8239.

Number

Commitment

8239

Revise DCD technical specifications 5.5.18 and 5.5.19.

Due Date/Event

Revision 3 of the USAPWR DCD