



Luminant

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March 14, 2011

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
RESCHEDULED REGULATORY COMMITMENTS**

Dear Sir:

Luminant Generation Company LLC (Luminant) hereby notifies the NRC that four regulatory commitments addressing the site-specific seismic margin analysis (SMA) have been consolidated and rescheduled. The four commitments are:

- 6481 ML092720676 ML101460210 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.
- 6491 ML092720676 ML101460210 When the seismic margin analysis for the design certification is available, we will confirm that the analysis envelopes the plant-specific design.
- 6631 ML093200501 ML101460210 With regard to the application of more recent guidance for probabilistic risk assessment - 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 Interim Staff Guidance (ISG-20), which is expected to prescribe detailed items that should be included in the FSAR. EPRI TR-1002989, "Seismic Probabilistic Risk Assessment Implementation Guide" may also be incorporated into the FSAR.
- 6641 ML093200501 ML101460210 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.

The Mitsubishi US-APWR SMA has been delayed by the Design Certification application seismic review. Thus, the SMA for Comanche Peak Units 3 and 4 has been delayed beyond the current commitment completion date of March 30, 2011 as well.

DO90
MRO

Luminant has combined the four closely-related commitments into a single commitment to simplify tracking and completion, as follows, which effectively completes the four commitments:

8256 Luminant commits to complete the site-specific SMA and update Final Safety Analysis Report Chapter 19 accordingly within four months of completion of the US-APWR SMA. The site-specific SMA will include evaluation of the site-specific structures using the guidance of ISG-20.

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

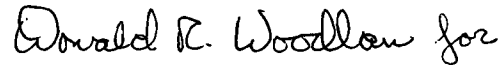
The only new commitment in this letter is #8256 addressed above.

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

Executed on March 14, 2011.

Sincerely,

Luminant Generation Company LLC



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