



Luminant

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CP-201100828
TXX-11074

Ref: 10 CFR 50.54(hh)(2)

June 8, 2011

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
30-DAY RESPONSE TO NRC BULLETIN 2011-01, MITIGATION STRATEGIES

REFERENCE: NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011

Dear Sir or Madam:

Pursuant to 10 CFR 50.54(f), this letter provides the Luminant Generation Company LLC (Luminant Power) 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011. The bulletin was issued to confirm continued compliance with 10 CFR 50.54(hh)(2) and request information regarding the mitigation strategies programs.

The NRC identified the following three objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

NRC Bulletin 2011-01 requested that within 30 days, licensees submit a response to questions to confirm continued compliance with 10 CFR 50.54(hh)(2) and requested within 60 days that licensees provide information regarding mitigation strategies programs required by 10 CFR 50.54(hh)(2). Luminant Power's 30-day response is provided in the attachment.

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NRR

This communication contains no new licensing basis commitments regarding Comanche Peak Units 1 and 2.

Should you have any questions, please contact Dennis Buschbaum at (254) 897-5851, or dennis.buschbaum@luminant.com.

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

Executed on June 8, 2011.

Sincerely,

Luminant Generation Company LLC

A handwritten signature in black ink that reads "Rafael Flores". The signature is written in a cursive, flowing style.

Rafael Flores

Attachment - 30-Day Response to Bulletin 2011-01

c - E. E. Collins, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak

30-Day Response to Bulletin 2011-01
Comanche Peak Nuclear Power Plant Units 1 and 2

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "*Mitigating Strategies*." The NRC is issuing this bulletin to achieve the following objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima-Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

The Bulletin requested that within 30 days of the date of this Bulletin, licensees provide information on their NRC mitigating strategies programs. The NRC questions related to the 30-day response are restated below followed by the Luminant Power, response for the Comanche Peak Units 1 and 2.

1. *Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?*

Response

Comanche Peak inspected and verified the availability of the equipment necessary to execute the mitigating strategies required by 10 CFR 50.54 (hh)(2) and as described in CPNPP submittals to the NRC. In addition, the portable pump required for some of the strategies was tested to ensure it was capable of performing its intended function with respect to the mitigation strategies. Letters of Agreement/Memorandums of Understanding with offsite organizations were also re-validated.

Luminant Power has confirmed that the equipment necessary to execute the mitigating strategies is available and capable of performing its intended function at Comanche Peak Units 1 and 2.

2. *Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?*

Response

10 CFR 50.54 (hh)(2) requires licensees to implement guidance and strategies under the circumstances associated with loss of large areas of the plant due to explosions or fire, in the following areas:

- (i) Fire fighting;
- (ii) Operations to mitigate fuel damage; and
- (iii) Actions to minimize radiological release.

Comanche Peak verified that the mitigation strategies associated with large area fires and explosions are implemented and capable of being performed as described in the Mitigation Strategy License Condition. Each procedure implementing the required mitigation strategies was walked down to ensure the procedures are in place and capable of being executed. The staffing and skill levels required to implement the mitigation strategies were also considered.

Luminant Power has confirmed that the guidance and strategies being implemented at Comanche Peak Units 1 and 2 are capable of being executed considering the current configuration of the facilities and current staffing and skill levels of the Comanche Peak personnel.

Reference: Comanche Peak Steam Electric Station, Units 1 and 2 Conforming License Amendments to Incorporate the Mitigation Strategies Required by Section B.5.b of Commission Order EA-02-026 (TAC NOS. MD4522 AND MD4523) dated July 26, 2007