



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

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August 4, 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
SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
NO. 5369 (SECTION 9.5.2)

Dear Sir:

As a result of a public meeting with the NRC Staff, Luminant, and Mitsubishi Nuclear Energy Systems on June 30, 2011, US-APWR Design Control Document (DCD) Subsection 9.5.2 has been revised to delete COL Information Items 9.5(7) and 9.5(9). In order to preserve consistency between the DCD and the Combined License Application, Luminant Generation Company LLC (Luminant) submits herein supplemental information for the response to Request for Additional Information (RAI) No. 5369 (CP RAI #196) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4.

Should you have any questions regarding this supplemental information, 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 August 4, 2011.

Sincerely,

Luminant Generation Company LLC


Rafael Flores

Attachment: Supplemental Response to Request for Additional Information No. 5369 (CP RAI #196)



Electronic distribution w/attachment:

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.Only@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
sfrantz@morganlewis.com
jrund@morganlewis.com
tmatthews@morganlewis.com
regina.borsh@dom.com
diane.aitken@dom.com
askolhek@bechtel.com
yoshinori_fujiwara@mhi.co.jp
kano_saito@mhi.co.jp
shigemitsu_suzuki@mhi.co.jp
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
yukako_hill@mnes-us.com
nicholas_kellenberger@mnes-us.com
ryan_sprengel@mnes-us.com
al_freitag@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
Frank.Akstulewicz@nrc.gov
ComanchePeakCOL.Resource@nrc.gov

SUPPLEMENTAL 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.: 5369 (CP RAI #196)

SRP SECTION: 09.05.02 - Communications Systems

**QUESTIONS for Instrumentation, Controls and Electrical Engineering 1 (AP1000/EPR Projects)
(ICE1)**

DATE OF RAI ISSUE: 1/14/2011

QUESTION NO.: 09.05.02-4 S01

Luminant is requested to rewrite a sentence in Section 9.5.2.2.2.2 of the COL FSAR to clarify the meaning of the information.

10 CFR 52.79(a)(2) requires "the descriptions shall be sufficient to permit understanding of the system designs and their relationship to the safety evaluations."

Section 9.5.2.2.2.2 of the FSAR includes the sentence "In emergency offsite communication, as the emergency notification system is connected through a local telephone company system, then a station package is required," which is unclear to the NRC staff. Luminant is requested to clarify this sentence.

SUPPLEMENTAL INFORMATION:

As a result of a public meeting with the NRC Staff, Luminant, and Mitsubishi Nuclear Energy Systems on June 30, 2011, US-APWR DCD Subsection 9.5.2 was revised (Reference 1) to delete COL Information Items 9.5(7) and 9.5(9) because neither 10 CFR 73.45 nor 10 CFR 73.46 is applicable to commercial nuclear power plants and because security communications for the US-APWR are addressed in DCD Section 13.6. Accordingly, FSAR Table 1.8-201 and Subsection 9.5.2 have been revised to delete the information addressing the two COL Information Items.

Reference

Letter, Yoshiki Ogata (MHI) to Jeff Ciocco (NRC), "MHI's Supplemental Response to US-APWR DCD RAI No. 139-1533 Revision 1 (SRP 09.05.02)," UAP-HF-11234, July 26, 2011

Impact on R-COLA

See attached marked-up FSAR Revision 2 pages 1.8-52, 9.5-20, 9.5-21, 9.5-22, and 9.5-23.

Impact on S-COLA

This response is considered standard.

Impact on DCD

None.

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Table 1.8-201 (Sheet 41 of 68)

COL 1.8(2)

Resolution of Combined License Items for Chapters 1 - 19

| COL Item No. | COL Item | FSAR Location | Resolution Category |
|--------------|--|------------------------------------|---------------------|
| COL 9.5(6) | The COL Applicant addresses connections to the Technical Support Center from where communications networks are provided to transmit information pursuant to the requirements delineated in 10 CFR 50 Appendix E, Part IV.E.9. | 9.5.2.2.5.2 | 3a |
| COL 9.5(7) | The COL Applicant addresses a continuously manned alarm station required by 10 CFR 73.46(e)(5) and the communications requirements delineated in 10 CFR 73.45(g)(4)(i) and (ii). The COL Applicant addresses notification of an attempted unauthorized or unconfirmed removal of strategic special nuclear material in accordance with 10 CFR 73.45(e)(2)(iii). Deleted from the DCD. | 9.5.2.2.5.2 9.5.2.3 | 3a |
| COL 9.5(8) | The COL Applicant addresses offsite communications for the onsite operations support center. | 9.5.2.2.5.2 | 3a |
| COL 9.5(9) | The COL Applicant addresses the emergency communication system requirements delineate in 10 CFR 73.55(f) such that a single act cannot remove onsite capability of calling for assistance and also as redundant system during onsite emergency crisis. Deleted from the DCD. | 9.5.2.2.5.2 | 3a |
| COL 9.5(10) | Deleted from the DCD. | | |
| COL 9.5(11) | The COL Applicant is to specify that adequate and acceptable sources of fuel oil are available, including the means of transporting and recharging the fuel storage tank, following a design basis accident. | 9.5.4.3 | 3a |
| COL 9.5(12) | The COL Applicant is to address the need for installing unit heaters in the Power Source Fuel Storage Vault during the winter for site locations where extreme cold temperature conditions exist. | 9.5.4.3 | 3a |

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RCOL2_02.05-4 S01

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Plant specific redundant external communication links include.

- Copper and fiber optic telephone circuits
- Microwave telephone links
- Fiber optic data links
- Emergency radio communication links
- Direct telephone links to utility operations centers, the NRC, and State and Local Emergency Operations facilities
- Personal cell phone links (no credit is taken but these links provide alternate links which allow for additional communication paths)

9.5.2.2.5.2 Emergency Communications

STD COL 9.5(6)
~~STD COL 9.5(7)~~
STD COL 9.5(8)
~~STD COL 9.5(9)~~

Replace the second and third sentence of the second paragraph in DCD Subsection 9.5.2.2.5.2 with the following.

RCOL2_09.0
5.02-4 S01

The effectiveness of the overall emergency response plan is in conformance with the requirements of 10 CFR 50.47 (b)(8). Adequate communications equipment are provided and maintained to allow the control room to communicate with offsite personnel and organizations. Pursuant to the emergency response plan, the following equipment is tested.

- An inspection and test is performed of the TSC voice communication equipment.
- An inspection and test is performed of the operation support center voice communication equipment.
- An inspection and test is performed of the EOF voice communication equipment.
- A test is performed of the means for warning or advising onsite individuals of an emergency.

~~A continuously manned alarm station as required by 10 CFR 73.46(e)(5) is provided.~~

RCOL2_09.0
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~~Communication subsystems are provided as required by 10 CFR 73.46(e)(5). Each guard, watchman, or armed responder on duty maintains continuous communication with each continuously manned alarm station. The individual in the alarm station is capable of calling for assistance from other guards, watchmen, armed responders, and from law enforcement authorities.~~

~~Communication network and equipments for rapid and accurate transmission of routine security information to onsite personnel are provided for assessment of a~~

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~~contingency and response to a contingency and for rapid transmission of information to offsite assessment team. This is in conformance to the requirements of 10 CFR 73.45(g)(4)(i) and (ii).~~

RCOL2_09.0
5.02-4 S01

~~Each alarm station required by 10 CFR 73.46 (e)(5) of the regulation has both conventional telephone service and radio or microwave transmitted two way voice communication, either directly or through an intermediary, for the capability of communication with the law enforcement authorities.~~

The offsite communications systems within the onsite Technical Support Center provide for emergency response following a design basis accident. During emergencies, the TSC is the primary onsite communication center for the communications to the control room, the operations support center and the NRC.

The Operations Support Center (OSC) is equipped with a PABX system similar to that provided for the TSC and the EOF. This PABX telephone system is connected to the offsite commercial telephone system and provides voice and facsimile communications capability for normal and emergency communications between the MCR, TSC, EOF, OSC, Corporate Offices, NRC, State agencies and county Sheriff's offices. In addition to the PABX system, the plant communication systems for the OSC also include the public address system / plant page – party system, the plant radio system and the sound powered telephone system.

In addition, provisions for communication with state and local operations centers are provided in the onsite TSC to initiate early notification and recommendations to offsite authorities prior to activation of the EOF. This is in accordance with the requirements of 10 CFR 50 Appendix E, Part IV.E.9.

STD COL 9.5(5)
STD COL 9.5(6)
~~STD COL 9.5(9)~~

Replace sixth paragraph in DCD Subsection 9.5.2.2.5.2 with the following.

The emergency offsite communication system serves as an alternate means of communication to notify local authorities of an emergency at the nuclear plant. Radios are provided for communications with the main control room, TSC, EOF, and local authorities.

RCOL2_09.0
5.02-4 S01

This emergency radio communications system connects onsite and offsite monitoring teams with the operation support center and EOF respectively.

~~The plant is provided with separate telephone systems for operations and for security pursuant to 10 CFR 73.55(f).~~ Data Communications is discussed in Section 7.9. Fire brigade communications is covered in Subsection 9.5.1.

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The emergency plan and security plan are described in Sections 13.3 and 13.6, respectively. These plans require testing of offsite communications links.

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9.5.2.3 Safety Evaluation

RCOL2_09.0
5.02-4 S01

~~STD COL 9.5(7) Add the following paragraph after the first paragraph in DCD Subsection 9.5.2.3.~~

~~Plant specific safety evaluations and procedures are established by the plant operator to prevent any unauthorized access to secure locations and or unconfirmed removal of strategic special nuclear material in accordance with 10 CFR 73.45(e)(2)(iii).~~

9.5.4.2.2.1 Fuel Oil Storage Tanks and Piping

CP COL 9.5(12) Replace tenth paragraph in DCD Subsection 9.5.4.2.2.1 with the following.

Insulation and heat tracing on the fuel oil piping in the concrete pipe chase and on a portion of the piping running down into the PSFSV area are provided to maintain fuel oil temperature within specification during winter. The concrete pipe chases between each fuel oil tank room and each PS/B are the areas through which the fuel oil piping passes through. Within each concrete pipe chase is a 3-hour fire rated wall that separates each PS/B from the associated PSFSV. The door and penetrations through each wall are all 3-hour fire rated. One side of each concrete pipe chase is part of a PS/B, which is a normally heated building.

9.5.4.3 Safety Evaluation

CP COL 9.5(11) Replace the second sentence of the seventh paragraph in DCD Subsection 9.5.4.3 with the following.

Fuel oil is normally brought in by tank truck for recharging the storage tank. Additionally, if circumstances require, railroad tank cars can be brought in on the site railroad spur. The CPNPP Units 3 and 4 are located approximately 90 miles southwest of the Dallas - Ft. Worth area. Dallas - Ft. Worth is a major commercial area which has distributors of diesel fuel that represent the majority of the major oil companies. The cities, such as Houston, Beaumont etc, within 300 miles from site are capable of supplying diesel fuel oil within seven days.

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9.5.9 Combined License Information

Replace the content of DCD Subsection 9.5.9 with the following.

CP COL 9.5(1)
STD COL 9.5(1) **9.5(1) Fire protection program, fire fighting procedures, and quality assurance**

This COL item is addressed in Subsections 9.5.1, 9.5.1.3, 9.5.1.6, Table 9.5.1-1R and Table 9.5.1-2R.

CP COL 9.5(2)
STD COL 9.5(2) **9.5(2) Site specific fire protection aspects**

This COL item is addressed in Subsection 9.2.1.2.1, 9.5.1.2.1, 9.5.1.2.2, 9.5.1.2.3, 9.5.1.2.4, Table 9.5.1-1R, Table 9.5.1-2R, Figure 9.5.1-201, Figure 9.5.1-202 and Appendix 9A.

CP COL 9.5(3)
STD COL 9.5(3) **9.5(3) Apparatus for plant personnel and fire brigades**

This COL item is addressed in Subsection 9.5.1.6.1.8 and Table 9.5.1-2R.

CP COL 9.5(4)
STD COL 9.5(4) **9.5(4) Communication system interfaces external to the plant (offsite locations)**

This COL item is addressed in Subsection 9.5.2, 9.5.2.2.2, 9.5.2.2.2.2 and 9.5.2.2.5.1.

STD COL 9.5(5) **9.5(5) The emergency offsite communications**

This COL item is addressed in Subsection 9.5.2.2.2, 9.5.2.2.2.2 and 9.5.2.2.5.2.

STD COL 9.5(6) **9.5(6) Connections to the Technical Support Center**

This COL item is addressed in Subsection 9.5.2.2.5.2

~~STD COL 9.5(7) **9.5(7) Continuously manned alarm station**~~Deleted from the DCD.

~~*This COL item is addressed in Subsection 9.5.2.2.5.2 and 9.5.2.3.*~~

RCOL2_09.0
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STD COL 9.5(8) **9.5(8) Offsite communications for the onsite operations support center.**

This COL item is addressed in Subsection 9.5.2.2.5.2

~~STD COL 9.5(9) **9.5(9) Emergency communication system**~~Deleted from the DCD.

~~*This COL item is addressed in Subsection 9.5.2.2.5.2.*~~

RCOL2_09.0
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9.5(10) Deleted from the DCD.

CP COL 9.5(11) **9.5(11) Fuel oil recharging**