

## PMComanchePeakPEm Resource

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**From:** Woodlan, Don [Donald.Woodlan@luminant.com]  
**Sent:** Friday, August 05, 2011 2:23 PM  
**To:** Evans, Todd; Conly, John  
**Cc:** ComanchePeakCOL Resource  
**Subject:** 2011-08-05 Woodlan, Clarification of NRC ACRS slides for Ch 8

Todd,

Do you intend to call Ngola or send the email? I am okay with your giving him a call but suggest avoiding phone tag. He is hard to get hold of. If you decide to call and don't reach him, send the email. If you decide not to call, that is fine too. Please be sure to copy the ComanchePeakCOL Resource address.

### Donald R. Woodlan

Manager, Nuclear Regulatory Affairs

**Luminant Power**

O- 254-897-6887 C- 214-542-7761

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**From:** Evans, Todd  
**Sent:** Friday, August 05, 2011 1:07 PM  
**To:** Woodlan, Don; Conly, John  
**Subject:** RE: 2011-08-05 Woodlan, RE: Evans RAI #9 S01 Draft C FSAR Markup

No problem. We can stick with using "shared" in our response and in the FSAR. I just wanted to get this alternative considered, which has been done. We'll wait for MNES to send in the final Rev 0 and go with it.

Todd

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**From:** Woodlan, Don  
**Sent:** Friday, August 05, 2011 1:07 PM  
**To:** Evans, Todd; Conly, John  
**Subject:** 2011-08-05 Woodlan, RE: Evans RAI #9 S01 Draft C FSAR Markup

Todd,

I do not know how we can say that the switching station is not shared. I do not favor the changes proposed to the supplemental response because I do not believe that the revised response will satisfy the reviewer. Yes, this is a partial implementation of GDC 5. If you look closely, I believe we also implement aspects of GDCs 2 and 4 in the design of the switching station and the transmission system. Although not as clean as one might like, I do not think this is unacceptable or different from other COLs (and even operating plants). I would prefer to avoid the word shared but the reviewer was explicit.

I agree with your assessment of the capability of offsite power.

### Donald R. Woodlan

Manager, Nuclear Regulatory Affairs

**Luminant Power**

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**From:** Evans, Todd  
**Sent:** Friday, August 05, 2011 12:50 PM  
**To:** Conly, John; Woodlan, Don  
**Subject:** FW: 2011-08-05 Woodland, RE: RAI #9 S01 Draft C FSAR Markup

I'm sorry this issue is consuming so much of everyone's time, including mine. I know there are many more important things that everyone needs to be working on. In spite of this, here are a few points I would like to make on this subject:

1. I went back and read and reflected on GDC 17. The entire context of GDC 17, at least the way I understand it, is in the context of a single unit. It has requirements for the "onsite electric power system" and the "offsite electric power system". For the offsite electric power system, it has requirements for the "two physically independent circuits". GDC 17 does allow "A switchyard common to both circuits", however, it does not speak to the situation of multi-unit sites with common or shared switchyards.
2. BTP 8-3 is in regard to "Stability of the Offsite Power Systems". The only scenario mentioned in the BTP is the "basic requirement is that loss of the largest operating unit on the grid will not result in loss of grid stability and availability of the offsite power to the plant under consideration." BTP 8-3 does not speak to multi unit sites, one way or the other. It does reference other documents (RG and IEEE) which I have not studied as part of this review.
3. GDC 5 seems to be where the words "sharing will not significantly impair their ability to perform their safety functions, including, in the event of an accident in one unit, an orderly shutdown and cooldown of the remaining units." These words do not come from GDC 17 and they do not come from BTP 8-3.

Therefore, with our current proposed response, we are basically conceding **some of** the words/aspects of GDC 5 as a design basis for the offsite power system without conceding the applicability of GDC 5 to the offsite power system.

It's interesting that the North Anna response avoids saying that the North Anna switchyard is "shared". They state that "the offsite power system has been shown to have adequate capacity to support auxiliary loads of one unit during an accident when the other two units are in a safe shutdown condition." Likewise, the words they put into their FSAR do not use the word shared. In hindsight, I think we should not have used the word "shared" in our response given what we know now, i.e. that the North Anna response is acceptable. Even though we used the word "shared" in our original response to RAI 9, **we might want to reconsider**, based on the recent knowledge of the acceptability of the North Anna response, **some different words in our RAI supplemental response and in what we put in the FSAR. Please see the attached markup of the RAI response.** The words in the FSAR markup would need to also change to these words. Of course, this would also change my email to Ngola should we choose to send him an email. I can still live with the current RAI response words that use the term "shared", but it would be very nice for the long term if we could walk away from this without have used "shared" in the FSAR similar to how North Anna did.

On a related subject, I have done a little more studying on what our basis is for making the statement that we are making, i.e. regarding offsite power system capacity during accident, etc. The Oncor stability study that I have (May 16, 2008, which I do not know if it is the current document or not – MNES should know what the version of the stability study is that our statements are based on), does not directly have a Case for this scenario. However, I believe that this case we are now saying we comply with is enveloped by the stability study. The stability study is based on several assumptions, including that the "Gross output of each CPNPP 3&4 unit is assumed to be 1730 MW with a total auxiliary load of 180 MW explicitly modeled for a total net output of 3280 MW." Then, Case 11 is for loss of the largest generator on the grid, which is the simultaneous loss of CPNPP 3&4, i.e. 3280 MW. What is not clear to me (because I don't have the details of the computer runs for the Case) is what load is assumed to remain imposed on the grid by CPNPP 3&4. I have to assume it remains at the 180 MW for two units. To me, this bounds the scenario we are now stating in the FSAR because the scenario has one unit in an accident condition for which the loads would be much less than 90 MW for that unit (the 90 MW is a conservative value for auxiliary load for a unit running at 100% power whereas accident loads would have to be no more than the rating of two GTGs, i.e. 9 MW). Therefore, I am comfortable that the stability study provides a basis for the statement we are making. **Does anyone see any holes in this thought process?**

Todd

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**From:** Woodlan, Don  
**Sent:** Friday, August 05, 2011 9:31 AM  
**To:** richard\_barnes@mnes-us.com  
**Cc:** Evans, Todd; Conly, John; joseph\_tapia@mnes-us.com; nicholas\_kellenberger@mnes-us.com; Bird, Bobby; 'russell\_bywater@mnes-us.com'  
**Subject:** RE: 2011-08-05 Woodland, RE: RAI #9 S01 Draft C FSAR Markup

Richard,

Thanks for bringing up these issues. I agree that if we are not careful, we can use the wrong terms and send the wrong message. GDC 17 and "offsite power system" seem to mean different things to different people even though the US-APWR has attempted to establish clear definitions. I believe the NRC believes we have shared equipment due to our original response to RAI-9. In that response we state:

(1) Comanche Peak Unit 3 and 4 are designed as a single-unit plant and onsite power systems important to safety are not shared by Units 3 and Unit 4. The only portions of power systems shared between Unit 3 and Unit 4 are the plant switching station and the transmission system. Unit 3 and Unit 4 are completely separate from Unit 1 and Unit 2 as shown in Figure 8.2-201.

I don't think there is any denying that the switching station is used by both Units 3 and 4. I know there may be some controversy over "important to safety" and "off site power system" as used by the US-APWR design. For that reason, we are not using the terms "important to safety" or "offsite power system" in the proposed FSAR update. The FSAR update is focused on the switching station.

As you continue your review, if you see any specific wording that is incorrect or may be misleading, please bring it up and we can address.

**Donald R. Woodlan**

Manager, Nuclear Regulatory Affairs

**Luminant Power**

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**From:** richard\_barnes@mnes-us.com [mailto:richard\_barnes@mnes-us.com]

**Sent:** Friday, August 05, 2011 8:54 AM

**To:** Woodlan, Don

**Cc:** Evans, Todd; Conly, John; joseph\_tapia@mnes-us.com; nicholas\_kellenberger@mnes-us.com

**Subject:** Re: 2011-08-05 Woodland, RE: RAI #9 S01 Draft C FSAR Markup

Don,

Please consider that within the context of GDC 17 and the "off site power system," there is no shared switching station equipment between CP3/4. The FSAR revision being proposed strongly implies that there is.

We will process the RAI supplemental response based upon your direction.

Thank you

RAB

"Woodlan, Don" <Donald.Woodlan@luminant.com>

08/05/2011 08:56 AM

To "Conly, John" <John.Conly@luminant.com>

cc "Evans, Todd" <Eric.Evans@luminant.com>, "Conly, John" <John.Conly@luminant.com>, "joseph\_tapia@mnes-us.com" <joseph\_tapia@mnes-us.com>, "richard\_barnes@mnes-us.com" <richard\_barnes@mnes-us.com>, "nicholas\_kellenberger@mnes-us.com" <nicholas\_kellenberger@mnes-us.com>

Subject 2011-08-05 Woodlan, RE: RAI #9 S01 Draft C FSAR Markup

John,

I prefer to put the same words in the FSAR that are in the response. “[The] switching station equipment shared between Units 3 and 4 has the capacity and is configured such that sharing will not significantly impair the ability to provide offsite power in response to an accident in one unit and an orderly shutdown and cooldown of the remaining unit.”

**Donald R. Woodlan**

Manager, Nuclear Regulatory Affairs

**Luminant Power**

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**From:** nicholas\_kellenberger@mnes-us.com[mailto:nicholas\_kellenberger@mnes-us.com]  
**Sent:** Friday, August 05, 2011 7:40 AM  
**To:** Conly, John  
**Cc:** Woodlan, Don; Evans, Todd; Conly, John; joseph\_tapia@mnes-us.com; richard\_barnes@mnes-us.com  
**Subject:** Re: RAI #9 S01 Draft C

John,

Here is the correct file. It was sitting right above the one I attached on my previous email.

Regards,

Nick Kellenberger  
COLA Licensing Engineer  
Mitsubishi Nuclear Energy Systems, Inc.  
600 East Las Colinas Blvd., Suite 850  
Irving, TX75039  
Tel: 972-401-5257  
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nicholas kellenberger/MHI

To "Conly, John" <John.Conly@luminant.com>

08/04/2011 03:07 PM

cc Donald.Woodlan@luminant.com, Eric.Evans@luminant.com,  
joseph\_tapia@mnes-us.com, richard barnes/MHI

Subject Re: RAI #9 S01 Draft C [Link](#)

John,

What do you think of these markups?

[attachment "FSAR\_CH08\_RAI182DraftC (Licensing Comments).pdf" deleted by nicholas kellenberger/MHI]

Regards,

Nick Kellenberger  
COLA Licensing Engineer  
Mitsubishi Nuclear Energy Systems, Inc.  
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"Conly, John" <John.Conly@luminant.com>

To "MNES RAI mailbox" <cp34-rai-luminant@mnes-us.com>

08/04/2011 12:19 PM

cc "Woodlan, Don" <Donald.Woodlan@luminant.com>, "Evans, Todd"  
<Eric.Evans@luminant.com>

Subject RAI #9 S01 Draft C

As a result of the NRC comments by Ngola, Luminant requests that MNES review attached Draft C of the supplemental information for this RAI. The NA3 response was recommended by the NRC as acceptable and Don altered that response to reflect CPNPP 3&4. Please ensure that MNES and MHI (if appropriate) are satisfied that the response is true and accurate. We respectfully request Rev 0 no later than CoB Monday, 8/8. Please call for discussion if necessary.

Thanks,

**John T. Conly**

**COLA Project Manager**

**(254) 897-5256**

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**From:** Woodlan, Don

**Created By:** Donald.Woodlan@luminant.com

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Tracking Status: None  
"Conly, John" <John.Conly@luminant.com>  
Tracking Status: None

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