

## PMComanchePeakPEm Resource

---

**From:** Conly, John [John.Conly@luminant.com]  
**Sent:** Monday, August 29, 2011 4:34 PM  
**To:** Akstulewicz, Frank; Ciocco, Jeff; Collins, Elmo; Hamzehee, Hossein; Johnson, Michael; Kramer, John; Matthews, David; Monarque, Stephen; ComanchePeakCOL Resource; Plisco, Loren; Singal, Balwant; Takacs, Michael; Tindell, Brian; Vrahoretis, Susan; Williamson, Alicia; Willingham, Michael  
**Subject:** Luminant Submits Licensing-Basis Freeze Point Letter  
**Attachments:** TXNB-11056 Licensing Basis Freeze.pdf

Luminant has submitted the attached letter to the NRC informing the NRC that the licensing-basis freeze point for CPNPP Units 3 and 4 is June 28, 2011, which is the submittal date of COLA Rev 2. If there are any questions regarding this submittal, please contact me or contact Don Woodlan (254-897-6887, [Donald.Woodlan@luminant.com](mailto:Donald.Woodlan@luminant.com)).

Thanks,

*John J. Conly*

**COLA Project Manager**  
**(254) 897-5256**

Confidentiality Notice: This email message, including any attachments, contains or may contain confidential information intended only for the addressee. If you are not an intended recipient of this message, be advised that any reading, dissemination, forwarding, printing, copying or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by reply message and delete this email message and any attachments from your system.

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 1497

**Mail Envelope Properties** (D7A32D47A61872409CE74F57B83C8B011CB9C0D58D)

**Subject:** Luminant Submits Licensing-Basis Freeze Point Letter  
**Sent Date:** 8/29/2011 4:34:02 PM  
**Received Date:** 8/29/2011 4:34:27 PM  
**From:** Conly, John

**Created By:** John.Conly@luminant.com

**Recipients:**

"Akstulewicz, Frank" <Frank.Akstulewicz@nrc.gov>  
Tracking Status: None  
"Ciocco, Jeff" <Jeff.Ciocco@nrc.gov>  
Tracking Status: None  
"Collins, Elmo" <Elmo.Collins@nrc.gov>  
Tracking Status: None  
"Hamzehee, Hossein" <Hossein.Hamzehee@nrc.gov>  
Tracking Status: None  
"Johnson, Michael" <Michael.Johnson@nrc.gov>  
Tracking Status: None  
"Kramer, John" <John.Kramer@nrc.gov>  
Tracking Status: None  
"Matthews, David" <David.Matthews@nrc.gov>  
Tracking Status: None  
"Monarque, Stephen" <Stephen.Monarque@nrc.gov>  
Tracking Status: None  
"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>  
Tracking Status: None  
"Plisco, Loren" <Loren.Plisco@nrc.gov>  
Tracking Status: None  
"Singal, Balwant" <Balwant.Singal@nrc.gov>  
Tracking Status: None  
"Takacs, Michael" <Michael.Takacs@nrc.gov>  
Tracking Status: None  
"Tindell, Brian" <Brian.Tindell@nrc.gov>  
Tracking Status: None  
"Vrahoretis, Susan" <Susan.Vrahoretis@nrc.gov>  
Tracking Status: None  
"Williamson, Alicia" <Alicia.Williamson@nrc.gov>  
Tracking Status: None  
"Willingham, Michael" <Michael.Willingham@nrc.gov>  
Tracking Status: None

**Post Office:** MDCEXMB01.tceh.net

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1005	8/29/2011 4:34:27 PM
TXNB-11056 Licensing Basis Freeze.pdf		128801

**Options**  
**Priority:** Standard

**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**



**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

CP-201101177  
Log # TXNB-11056

Ref. # 10 CFR 52

August 29, 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  
IMPLEMENTATION OF LICENSING-BASIS FREEZE POINT

Dear Sir:

The NRC staff is currently reviewing the application by Luminant Generation Company LLC (Luminant), acting for itself and as agent for Comanche Peak Nuclear Power Company LLC (CPNPC), for Combined Licenses (COLs) for two Mitsubishi US-APWR reactors to be constructed at the existing Comanche Peak Nuclear Power Plant site. The NRC staff is conducting Phase 2 of the safety review of this application. Based on Interim Staff Guidance ISG-011, Luminant has established the licensing-basis freeze point for the COLA review as the issue date for COLA Revision 2 (June 28, 2011).

The purpose of the freeze point is to establish the licensing basis upon which the NRC will issue the COL. After the freeze point, the design and licensing basis for the units may continue to change. Changes after the freeze point will be assessed to determine if the application needs to be revised (necessary changes) or if the change can be tracked internally until the COL is issued and then processed via the appropriate regulatory process (deferred changes). In general, a change will be deferred unless it meets one or more of the criteria described in ISG-011 or the criteria listed below:

- Substantive changes made to the US-Advanced Pressurized Water Reactor (US-APWR) Design Control Document (DCD) that affect the COLA
- Correction of significant errors in the COLA
- Changes needed to ensure compliance with NRC regulations
- Changes needed to support other licensing-basis documents (e.g., conforming changes to information in the FSAR supporting technical specifications)
- Significant technical corrections associated with the design or program described in the licensing document (i.e., if not changed, would preclude operation within the bounds of the licensing basis, as opposed to proposed alternatives to the described design or program)
- Changes needed to address a significant vulnerability identified by probabilistic risk assessments (PRAs) or other studies (e.g., a change in a PRA insight)

In general, changes needed to respond to RAIs and allow the NRC to write the SERs needed for the COLA review would meet either the second or third bullet above. Changes that meet any of these criteria will not be deferred. Deferred changes will be screened in accordance with internal guidance to confirm that the criteria of ISG-11 are met. If circumstances dictate any deviation from this freeze point process, the NRC will be notified in writing.

This letter contains the following commitments:

No.	Commitment
8300	Deferred Changes will be screened in accordance with internal guidance to confirm that the criteria of ISG-11 are met.
8301	Changes that meet any of the stated criteria will not be deferred. Luminant will notify the NRC in writing if circumstances dictate any deviation from this licensing-basis freeze point process.

Should you have any questions regarding Luminant's implementation of the licensing-basis freeze point, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

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

Executed on August 29, 2011.

Sincerely,

Luminant Generation Company LLC



Rafael Flores

Electronic distribution:

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.Conly@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