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September 30, 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
INTEGRATED SEISMIC CLOSURE PLAN**

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, for Combined Licenses for two Mitsubishi US-APWR reactors to be constructed at the existing Comanche Peak Nuclear Power Plant site. One of the remaining challenges for phase 2 of the safety review is the review and closure of activities related to the seismic design of the structures at the site (primarily Final Safety Analysis Report Sections 3.7 and 3.8). Luminant is developing an Integrated Seismic Closure Plan to address the various unresolved issues, including potential departures, in a comprehensive and coordinated manner.

This plan addresses the seismic issues that remain to be resolved, including:

- Standard plant seismic analysis methodology and results
- Impact of changing the assumed groundwater level
- Assessment of building sliding
- Response to Request for Additional Information (RAI) No. 5798 (CP RAI #221)
- Response to RAI No. 5947 (CP RAI #226)
- US-APWR seismic margin analysis (SMA)

Some of the key activities and projected completion dates are listed below:

- Respond to RAI-221 (complete)
- Develop scope and high level schedule (complete)
- Drop-in visit with NRC for an administrative discussion of plan (complete)
- Respond to RAI-226 (October 28, 2011)
- Update SMA description in FSAR (October 2011)

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- Assess the standard plant design to determine which aspects of the DCD design impact the site-specific design for standard plant structures and site-specific structures, and identify the CPNPP products which are impacted (e.g., require confirmation, reanalysis or updating) (November 2011)
- Resolve SASSI subtraction method issues (November 2011)
- Meet with NRC (probably a public meeting) to present a more detailed plan regarding seismic closure activities (December 2011)
- Complete activities and provide updates to NRC (June 2012)

The proposed meeting with the NRC Staff in December 2011 is a key event. Luminant anticipates that a more detailed plan will be presented based on the assessments to be performed over next several months and the issuance of the US-APWR DCD seismic products scheduled for completion in this same time frame. Luminant does not intend to pursue departures to some new aspects of the DCD design (namely shear keys and the addition of ballast to some base-mats) at this time. Luminant intends to discuss these potential departures in more detail at the December meeting. Other topics of interest such as the use of waterproof membranes and the application of Finite Element Models will also be discussed at that time.

The schedule above is aggressive and is based upon the standard plant schedule and some assumptions. Luminant believes that quality products can be produced per the schedule above if the standard plant schedule is maintained and the assumptions remain valid. Luminant will communicate challenges and changes to the plan as they are identified to allow the NRC to plan review activities.

Should you have any questions regarding Luminant's Integrated Seismic Closure Plan, 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 September 30, 2011.

Sincerely,

Luminant Generation Company LLC


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