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October 10, 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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION NO. 6025
(SECTION 6.2.2) AND 6057 (SECTION 1)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Requests for Additional Information (RAIs) No. 6025 (CP RAI #229) and No. 6057 (CP RAI #231) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAIs address the containment cleanliness program and compliance with Regulatory Guide 1.26, respectively.

Should you have any questions regarding these responses, 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 October 10, 2011.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

- Attachments: 1. Response to Request for Additional Information No. 6025 (CP RAI #229)
2. Response to Request for Additional Information No. 6057 (CP RAI #231)

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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.: 6025 (CP RAI #229)

SRP SECTION: 06.02.02 - Containment Heat Removal Systems

QUESTIONS for Containment and Ventilation Branch 1 (AP1000/EPR Projects) (SPCV)

DATE OF RAI ISSUE: 9/12/2011

QUESTION NO.: 06.02.02-4

This is a follow-up question to RAI Letter Number 76 (3105) Question 06.02.02-3.

NUREG-0800, Standard Review Plan (SRP) 6.2.2, 'Containment Heat Removal Systems,' and Regulatory Guide 1.82, 'Water Sources for Long-term Recirculation Cooling Following a Loss-of-Coolant Accident,' Revision 3, establish an acceptable approach with criteria that the NRC staff will use to evaluate whether an applicant meets applicable NRC's regulations.

Regulatory Guide 1.82, Revision 3, as modified and supplemented for pressurized water reactors by the Nuclear Energy Institute (NEI) Guidance Report (NEI 04-07 GR) and the NRC safety evaluation (SE), dated September 20, 2004 (ADAMS Accession Number ML042640307) provide guidance for cleanliness programs and debris evaluations.

The Comanche Peak Nuclear Power Plant (CPNPP) COL Application Part 2, FSAR Sub-section 6.2.2.3, Revision 2 provides a STD COL item 6.2(5) requiring the preparation of a containment cleanliness program. STD COL item 6.2(5) states that containment cleanliness program includes guidance documents used to develop the cleanliness program survey/sampling methods. The staff request that the COL applicant document in COL item 6.2(5) the specific criteria or guidance documents used so the staff can evaluate the acceptability of CPNPP's approach. As an example, the staff found the cleanliness program survey/sampling methods presented in NEI 04-07 as supplemented by the NRC SE to be an acceptable approach. If the COL applicant intends to be consistent with this guidance, the staff request that the COL applicant update COL item 6.2(5) with this information.

ANSWER:

The COL applicant will develop a cleanliness program using guidance documents to develop the cleanliness program survey/sampling methods including NEI 04-07 (Ref. 1) and the NRC Safety Evaluation of NEI 04-07 (Ref. 2) to maintain the latent debris quantity in containment below 200 lb as assumed in DCD Subsection 6.2.2.3. These references have been incorporated into FSAR Subsection 6.2.2.3.

References

- 1) Nuclear Energy Institute (NEI), NEI 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology," Revision 0, December 2004 (ML050550138).
- 2) Nuclear Regulatory Commission, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Generic Letter 2004-02", Revision 0, December 6, 2004 (ML050550156).

Impact on R-COLA

See attached marked-up FSAR Revision 2 page 6.2-1.

Impact on S-COLA

None; this response is standard.

Impact on DCD

None.

Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 2, FSAR

6.2 CONTAINMENT SYSTEMS

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

6.2.2.3 Design Evaluation

STD COL 6.2(5) Replace the last sentence of the the first bullet of tenth paragraph in DCD Subsection 6.2.2.3 with the following.

Administrative procedures in Subsection 13.5.1 implement the containment cleanliness program.

The program includes the following:

- Organizational responsibilities for implementing the program
- Controls and limits on type and quantity of materials for all modes of operation (not limited to outages)
- Guidance documents used to develop the cleanliness program survey/sampling methods including NEI 04-07(Ref. 6.2-24) and associated NRC safety evaluation dated December 6, 2004.
- Inspection frequency
- Evaluation frequency
- Reporting requirements for degraded conditions or non-conforming results

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2.02-4

Procedures to remove foreign materials and minimize the amount of debris that might be left in containment following refueling and maintenance outages address the following:

- Frequency of cleanliness control and inspection activities for operation and maintenance
- Restriction of materials introduced into the containment
- Accounting for materials introduced into and out of the containment (e.g., scaffold, tape, labels, plastic film, paper, cloth, keys, and pens)
- Cleaning of maintenance outage area, including areas associated with removal or replacement of insulation

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.: 6057 (CP RAI #231)

SRP SECTION: 01 - Introduction and Interfaces

QUESTIONS for USAPWR Projects Branch (NMIP)

DATE OF RAI ISSUE: 9/27/2011

QUESTION NO.: 01-6

COLA, Revision 2, Enclosure 11, Quality Assurance Program Description," Revision 1, Part IV Regulatory Commitments lists the regulatory guides (RGs) and the other quality assurance standards that were selected to support the Luminant QAPD. RG 1.26, "Quality Group Classifications and Standards for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants," Revision 4, March 2007 is one of the RGs listed in Part IV. However, RG 1.26 is not listed on FSAR Chapter 1, Table 1.9-201, "Comanche Peak Nuclear Power Plant, Units 3 and 4 Conformance with Division 1 Regulatory Guides."

RG 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)," C.I.1.9.1 states, in part, "for the site-specific portions of the facility design that are not included in the referenced certified design, a COL applicant should address conformance with RGs in effect 6 months before the submittal date of the COL application."

As such, Luminant is requested to revise FSAR Chapter 1, Table 1.9-201 to include RG 1.26.

ANSWER:

FSAR Table 1.9-201 has been revised to include RG 1.26. The RG is listed in the notes for Table 3.2-201 as one of the "Codes and Standards" used to classify site-specific systems, components and equipment. Although not currently used as a specific standard for any of the systems and components listed on the table, this RG is one of the standards used to assess the proper classification of systems and components as noted in the QAPD as referenced by FSAR Section 17.5.

Impact on R-COLA

See attached marked-up FSAR Revision 2 page 1.9-4.

Impact on S-COLA

None; this response is site-specific.

Impact on DCD

None.

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 2, FSAR**

CP COL 1.9(1)

**Table 1.9-201 (Sheet 1 of 12)
Comanche Peak Nuclear Power Plant Units 3 & 4 Conformance with Division 1 Regulatory Guides**

RG Number	RG Title	Revision/Date	COLA FSAR Status	Corresponding Chapter/Section
1.8	Qualification and Training of Personnel for Nuclear Power Plants	Revision 3 May 2000	Conformance with exceptions (Criterion 2: The minimum qualification requirement of the plant staff conforms to CPNPP Units 3 and 4 technical specification and Chapter 13. And QA conforms to quality assurance program description [QAPD].)	12.1.1.3.1 13.1 17.5 COLA Part 4
1.12	Nuclear Power Plant Instrumentation for Earthquakes	Revision 2 March 1997	Conformance	3.7.4
1.16	Reporting of Operating Information – Appendix A Technical Specifications	Revision 4 August 1975	Not applicable (This RG was withdrawn on 8/11/2009.)	N/A
1.21	Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants	Revision 1 June 1974	Conformance with exceptions (ANSI N13.1-1999 is applied in C.6.)	11.5.2
1.23	Meteorological Monitoring Programs for Nuclear Power Plants	Second Proposed Revision 1 April 1986	Conformance; revision of record CPNPP Units 1 and 2	2.3.3 2.3.4
1.24	Assumptions Used for Evaluating the Potential Radiological Consequences of a Pressurized Water Reactor Radioactive Gas Storage Tank Failure	Revision 0 March 1972	Conformance	N/A
<u>1.26</u>	<u>Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants</u>	<u>Revision 4</u> <u>March 2007</u>	<u>Conformance</u>	<u>3.2</u> <u>17.5 (QAPD)</u>

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