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November 8, 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. 5391 (SECTION 14.3.3)

Dear Sir:

As a result of informal correspondence with the NRC staff on October 24, 2011, Luminant Generation Company LLC (Luminant) submits herein supplemental information for the response to RAI No. 5391 (CP RAI #212) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The supplemental information addresses ITAAC Table A.2-1.

Should you have any questions regarding the 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 November 8, 2011.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: Supplemental Response to Request for Additional Information No. 5391 (CP RAI #212)

DO90
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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.: 5391 (CP RAI #212)

SRP SECTION: 14.03.03 - Piping Systems and Components - Inspections, Tests, Analyses, and Acceptance Criteria

QUESTIONS for Engineering Mechanics Branch 1 (AP1000/EPR Projects) (EMB1)

DATE OF RAI ISSUE: 3/21/2011

QUESTION NO.: 14.03.03-5

This question is a follow-up to question 14.03.03-4, (2) of RAI Letter No 56 (2583).

As previously requested, the staff requests the applicant revise the ITAAC Number 5.b of Part 10, Table A.1-1. To bring consistency among all the columns in the ITAAC as well as clarify the seismic category of the piping systems, use the phrases "Seismic Category I piping" in the Design Commitment and "as-built Seismic Category I piping" in the Acceptance Criteria (AC) and Inspections, Tests, Analyses (ITA).

SUPPLEMENTAL INFORMATION:

Luminant submits this supplemental response to correct ITAAC Item 2.c in Table A.2-1 to bring consistency among the columns in the ITAAC.

Impact on R-COLA

See attached marked-up Part 10 Revision 2 page 24.

Impact on S-COLA

This response is site-specific.

Impact on DCD

None.

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 10 - ITAAC and Proposed License Conditions
Appendix A.2**

**Table A.2-1 (Sheet 1 of 2)
UHS ESW Pump House Ventilation System
Inspections, Tests, Analyses, and Acceptance Criteria**

| Design Commitment | Inspections, Tests, Analyses | Acceptance Criteria |
|--|---|---|
| 1.a The functional arrangement of the UHS ESW pump house ventilation system is as described in the Design Description of Section A.2.1 and as shown in Figure A.2-1 | 1.a Inspection of the as-built UHS ESW pump house ventilation system will be performed. | 1.a The as-built the UHS ESW pump house ventilation system conforms to the functional arrangement as described in the Design Description of Section A.2.1 and as shown in Figure A.2-1. |
| 1.b Each mechanical division of the UHS ESW pump house ventilation system (Division A, B, C & D) is physically separated from the other divisions so as not to preclude accomplishment of the safety function. | 1.b Inspection and analysis of the as-built UHS ESW pump house ventilation system will be performed. | 1.b A report exists and concludes that each mechanical division of the as-built UHS ESW pump house ventilation system is physically separated from other mechanical divisions by spatial separation, barriers, or enclosures so as to assure that the functions of the safety related systems are maintained. |
| 2. The seismic Category I equipment, identified in Table A.2-2, can withstand seismic design basis loads without loss of safety function. | 2.a Inspections will be performed to verify that the seismic Category I as-built equipment identified in Table A.2-2 is located in a seismic Category I structure. | 2.a The seismic Category I as-built equipment identified in Table A.2-2 is located in a seismic Category I structure. |
| | 2.b Type tests, analyses, or a combination of type tests and analyses of the seismic Category I equipment identified in Table A.2-2 will be performed using analytical assumptions, or will be performed under conditions, which bound the seismic design basis requirements. | 2.b A report exists and concludes that the seismic Category I equipment identified in Table A.2-2 can withstand seismic design basis loads without loss of safety function. |
| | 2.c Inspection and analyses will be performed to verify that the as-built <u>seismic Category I</u> equipment identified in Table A.2-2, including anchorages, is seismically bounded by the tested or analyzed conditions. | 2.c A report exists and concludes that the as-built seismic Category I equipment identified in Table A.2-2, including anchorages, is seismically bounded by the tested or analyzed conditions. |
| 3.a Class 1E equipment identified in Table A.2-2 is powered from its respective Class 1E division. | 3.a A test will be performed on each division of the as-built Class 1E equipment identified in Table A.2-2 by providing a simulated test signal only in the Class 1E division under test. | 3.a The simulated test signal exists at the as-built Class 1E equipment identified in Table A.2 -2 under test. |

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