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Ref. # 10 CFR 52

November 14, 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. CP RAI #198 (10 CFR PARTS 30, 40, AND 70)

Dear Sir:

As a result of several conference calls with the NRC staff, Luminant Generation Company LLC (Luminant) submits herein supplemental information for the response to CP RAI #198 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The supplemental information addresses receipt of byproduct, source, or special nuclear material.

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 14, 2011.

Sincerely,

Luminant Generation Company LLC

A handwritten signature in black ink that reads "Donald R. Woodlan for".

Rafael Flores

Attachment: Supplemental Response to Request for Additional Information No. CP RAI #198

DD90
NRD

Electronic distribution w/attachment:

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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.: CP RAI #198

**REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE STANDARD LICENSE
CONDITIONS FOR TITLE 10 OF THE CODE OF FEDERAL REGULATIONS, PARTS 30, 40 AND 70**

DATE OF RAI ISSUE: 1/14/2011

QUESTION NO.: 198-2

As part of its response to this RAI, Luminant is requested to provide information on the specific Parts 30, 40 and 70 licenses being requested and sufficient information in the COLA, Part 2, FSAR that demonstrates compliance with the applicable portions of 10 CFR Parts 30, 40 and 70. For example, in the COLA, Part 2, FSAR Chapter 1, Luminant may provide a subsection or a chart that informs the NRC staff of the locations within the COLA, Part 2, FSAR, where it describes how Luminant has addressed the applicable requirements of 10 CFR Parts 30, 40 and 70, for example radiation protection, emergency preparedness, security, non-licensed plant staff training, and fire protection program elements that will be in place prior to receipt of the byproduct, source, or SNM authorized by the proposed license in paragraph 1, above.

SUPPLEMENTAL INFORMATION:

Based upon conferences with the NRC related to the FSAR Chapter 12 Safety Evaluation with Open Items, the last remaining open item related to the 10 CFR 30, 40 and 70 exemption and license conditions is for Luminant to establish a Radiation Protection Supervisor (ANS-3.1-1993 in Table 13.1-201) to control receipt of byproduct, source or special nuclear material (SNM) for CPNPP Units 3 and 4. After issuance of the COL and prior to the Commission's 10 CFR 52.103(g) finding, the Radiation Safety Officer shall be the designated radiation protection supervisor. The radiation sources will be used by or under the supervision of the radiation protection supervisor implementing the program. The radiation protection supervisor's position is identified in FSAR Section 13.1 and Table 13.1-201. This position meets the guidance of ANSI/ANS-3.1-1993 with the selection, training and qualifications consistent with the guidance of Regulatory Guide 1.8 as stated in FSAR Section 13.1, and utilizing NEI 07-03A for implementation of the Radiation Protection Program.

FSAR Table 13.4-201 has been revised to identify a Radioactive Source Control RP Supervisor assigned prior to initial receipt of by-product, source, or SNM (excluding Exempt Quantities as described in 10 CFR 30.18).

Impact on R-COLA

See attached marked-up FSAR Revision 2 page 13.4-7.

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 13.4(1)

Table 13.4-201 (Sheet 6 of 11)

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				Milestone	Requirement
10.	Radiation Protection Program	10 CFR 20.1101	12.5	Prior to initial receipt of by-product, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18) for those elements of the Radiation Protection (RP) Program necessary to support such receipt	License Condition
	<ul style="list-style-type: none"> • <u>Radioactive Source Control (assignment of RP Supervisor)</u> • <u>Assignment of RP Supervisor</u> • <u>Assignment of Nuclear RP Manager</u> 	10 CFR 20.1801			
	<ul style="list-style-type: none"> • Ground Water Monitoring Program 	10 CFR 20.1406	12.5	<ul style="list-style-type: none"> Prior to fuel receipt for those elements of the RP Program necessary to support receipt and storage of fuel on-site Prior to fuel load for those elements of the RP Program necessary to support fuel load and plant operation Prior to first shipment of radioactive waste for those elements of the RP Program necessary to support shipment of radioactive waste 	License Condition
11.	Non licensed Plant Staff Training Program	10 CFR 50.120 10 CFR 52.78	13.2.2	18 months prior to scheduled fuel load	10 CFR 50.120(b)

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