



**Luminant**

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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  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION NO. 6137  
(SECTION 1)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 6137 (CP RAI #235) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAI response addresses COL holder items.

Should you have any questions regarding this response, 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

Rafael Flores

Attachment: Response to Request for Additional Information No. 6137 (CP RAI #235)

DO9D  
NRD

Electronic distribution w/ attachment:

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**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

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**Comanche Peak, Units 3 and 4**

**Luminant Generation Company LLC**

**Docket Nos. 52-034 and 52-035**

**RAI NO.: 6137 (CP RAI #235)**

**SRP SECTION: 01 - Introduction and Interfaces**

**QUESTIONS for USAPWR Projects Branch (NMIP)**

**DATE OF RAI ISSUE: 10/31/2011**

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**QUESTION NO.: 01-7**

Comanche Peak Nuclear Power Plant, Units 3 and 4 COL application, Part 2, FSAR, Chapter 1, Table 1.8-201, 'Resolution of Combined license Items for Chapters 1 - 19,' page 1.8-79, Note 3c. specifies the term 'Holder Items' as one of several resolution categories for each COL Information Item.

The NRC staff issued Interim Staff Guidance (ISG)-15, "Final Interim Staff Guidance on Post-Combined license Commitments," ESP/DC/COL-ISG-015. This ISG states that COL Holder Items were defined by some applicants as COL action items that could not be completed until after license issuance. ISG-015 further states that the term 'COL holder item' is not defined in NRC regulations or guidance and applicants should refrain from using this term. As such, the applicant is requested to delete Table 1.8-201 Note 3c from FSAR, chapter 1.

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**ANSWER:**

FSAR Table 1.8-201 has been revised to delete the term 'Holder Item' as requested. In addition, Part 10 Section 2.2 also describes COL Holder Items and has been deleted. Finally, the introduction to Part 4 uses the term COL Holder Items in Section A and this reference has been deleted.

Impact on R-COLA

See attached marked-up FSAR Revision 2 page 1.8-80, Part 4 Revision 2 page 1, and Part 10 Revision 2 page 2.

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**

**Table 1.8-201 (Sheet 69 of 69)**

**Resolution of Combined License Items for Chapters 1 - 19**

CP COL 1.8(2)

COL Item No.	COL Item	FSAR Location	Resolution Category
COL 19.3(6)	The COL applicant develops an accident management program which includes severe accident management procedures that capture important operator actions. Training requirements are also included as part of the accident management program.	19.2.5	2

**Note:**

The designation of the resolution category indicates the resolution status of each COL item categorized to 1a, 1b, 2, 3a, 3b, 3c, 4, or 5

1. Operational programs
  - 1a. Applicant item as License Condition for Operational program
  - 1b. Applicant item as Commitment for Operational program
2. Plant procedures
3. Design information
  - 3a. Applicant item Design information provided in FSAR
  - 3b. Applicant item as Commitment for Design information to be provided before COL issuance
  - 3c. ~~Holder item~~ Not used
4. Detailed schedule information
5. The inspections, tests, analyses, and acceptance criteria (ITAAC)  
(See Subsection 1.8.1.2 for further discussion.)

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-7

**Comanche Peak Nuclear Power Plant, Units 3 & 4  
COL Application  
Part 4, Technical Specifications**

## **TECHNICAL SPECIFICATIONS AND BASES**

### **Introduction**

The US-APWR Technical Specifications (TS) and Bases in DCD are incorporated by reference into the Plant-Specific Technical Specifications (PSTS) with the following departures and/or supplements.

Section A addresses the completion of the bracketed information from the US-APWR TS and Bases in DCD as well as any additional departures or supplements identified during the development of the Combined Operating License (COL) Application. Section B provides a complete copy of the PSTS suitable for enclosing with the Combined License.

### **Section A. Plant-Specific Technical Specifications compared to the US-APWR Technical Specifications in DCD**

#### **~~1. COL Holder Items~~**

~~There is no COL Holder Item.~~

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#### **2. COL Applicant Items and other Supplemental Information**

The remaining bracketed items in the US-APWR TS and Bases in DCD are plant-specific and are addressed as follows. PSTS pages reflecting each PSTS change to the US-APWR TS and Bases are provided following this section.

#### **CP COL 16.1(1) Risk-Managed Technical Specifications**

US-APWR TS Wording in DCD  
EXAMPLE 1.3-8 in Section 1.3 placed in brackets [ ].

Required Actions stated as "Apply the requirements of Specifications 5.5.18" with their completion time in Section 3 and associated Bases placed in brackets [ ].

Subsection 5.5.18 placed in brackets [ ] with a sentence "Not used OR" at the beginning of the description.

PSTS Wording  
All of the brackets noted above were removed.

The sentence "Not Used OR" was removed in Subsection 5.5.18.

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

**1. ITAAC**

The ITAAC for the COLA consist of the following:

- 1) Design Certification ITAAC are contained in DCD Tier 1 and are incorporated by reference.
- 2) Plant-Specific ITAAC are provided in Appendices A.1, A.2, A.3, and A.4. The design description information contained in the Appendices is a compilation of information from various sources in the FSAR and is included to assist the reader in reviewing information pertinent to the Plant-Specific ITAAC.
- 3) Emergency Planning ITAAC are provided in Appendix B.
- 4) Physical Security ITAAC for the DCD are contained in DCD Tier 1 and are incorporated by reference. Plant Specific Security ITAAC are provided in Appendix C.

**2. Proposed License Conditions**

The NRC and industry are currently evaluating the appropriate license conditions for a Combined Operating License (COL). Identified below are several possible topics for license conditions that serve as a starting point for consideration. The listing is not final nor are all items necessarily appropriate. As a result, this section will not be updated during the COL review until further NRC and industry guidance is available. As specific license conditions are identified they will be added to section 3 below.

**2.1 Completion of ITAAC**

Completion of the ITAAC listed in the previous section may be a proposed license condition to be satisfied prior to fuel load. However, this license condition may not be necessary as the ITAAC may be adequately controlled by the regulations.

**2.2 ~~COL Holder Items~~ Not Used**

~~COL Information Items are identified in Chapter 1 of the FSAR (Table 1.8-201) and are cross-referenced to identify the section in this COLA that addresses each Information Item from the referenced certified design. Items that cannot be resolved prior to issuance of the COL are identified as Holder Items. Implementation of all Holder Items by the milestone stated in the relevant section of the FSAR, is potential condition to the license. There are alternate methods to track these items including a commitment tracking system or NRC inspection schedules. If such alternate systems are found to be appropriate, a license condition may not be necessary or a more limited license condition addressing only selected Holder Items may be appropriate.~~

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