

PMComanchePeakPEm Resource

From: Woodlan, Don [Donald.Woodlan@luminant.com]
Sent: Tuesday, November 08, 2011 5:09 PM
To: Monarque, Stephen; ComanchePeakCOL Resource
Cc: Conly, John; Evans, Todd; 'nicholas_kellenberger@mnes-us.com'; 'Russ Bywater'; 'tapia_joseph@mnes-us.com'
Subject: 2011-11-08 RCOL Ch 1 - RAI Number 236 - RG 1.143, Potential Clarification

Steve,

We may need a clarifying conference call on this RAI. We agree that the RG 1.143 should be included in Chapter 1 and we intend to do so in our answer to the RAI. The RAI also states:

In addition, the applicant took an exception to this RG, due to the fact that the RG does not include guidance concerning evaporation ponds, or impoundment facilities used in relation to the plant liquid effluents at Comanche Peak Nuclear Power Plant. Therefore, the applicant is requested to revise Table 1.9-201 to include RG 1.143 and note the exception in this table.

Luminant does not understand the reference to an exception to the RG. As noted in the draft SER with Open Items for Chapter 11, we conform to RG 1.143 for the mobile liquid radioactive waste processing equipment and interconnections. The SER also acknowledges the Luminant position that the evaporation pond is not part of the LWMS and, as such, RG 1.143 would not apply. The RG itself states, "The radwaste system terminates at the point of controlled discharge to the environment, at the point of recycle to the primary or secondary water system storage tanks, or at the point of storage of packaged solid wastes." As noted in the FSAR and the SER, the liquid radwaste system ends at the isolation valve in the discharge header to the evaporation pond. A release to the evaporation pond is considered a release to the environment and the evaporation pond is only designed to manage the H-3 concentration in the SCR. There is no mention of exceptions to this RG in the Chapter 11 SER with Open Items or in the CPNPP FSAR.

The RAI question seems to imply that there is an exception to the RG and we should so note in the answer and FSAR update. We do not believe that either the FSAR or SER implies that an exception exists. We do not believe that any exceptions to this RG should be listed in Chapter 1. Does the reviewer agree or is there an issue that we are not aware of?

Please provide clarification. An email or phone call will suffice or we can schedule a conference call if appropriate.

Thanks,

Donald R. Woodlan

Manager, Nuclear Regulatory Affairs

Luminant Power

O- 254-897-6887 C- 214-542-7761

From: Monarque, Stephen [<mailto:Stephen.Monarque@nrc.gov>]
Sent: Wednesday, November 02, 2011 3:10 PM
To: Conly, John; Woodlan, Don; 'cp34-rai-luminant@mnes-us.com'; Evans, Todd; joseph tapia; 'Kazuya Hayashi'; Weeks, Matthew; 'Russ Bywater'; MNES RAI mailbox (cp34-rai-luminant@mnes-us.com)
Cc: ComanchePeakCOL Resource
Subject: 2011-11-02 Comanche Peak RCOL Chapter 1 - RAI Number 236

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 35 calendar days of **November 2, 2011**.

Note: The NRC staff requests that the RAI response include any proposed changes to the FSAR.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

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Mail Envelope Properties (A34507C196705B44B7F8F0B1BFE80AAE085F30BD02)

Subject: 2011-11-08 RCOL Ch 1 - RAI Number 236 - RG 1.143, Potential Clarification
Sent Date: 11/8/2011 5:08:40 PM
Received Date: 11/8/2011 5:08:25 PM
From: Woodlan, Don

Created By: Donald.Woodlan@luminant.com

Recipients:

"Conly, John" <John.Only@energyfutureholdings.com>
Tracking Status: None
"Evans, Todd" <Eric.Evans@luminant.com>
Tracking Status: None
"nicholas_kellenberger@mnes-us.com" <nicholas_kellenberger@mnes-us.com>
Tracking Status: None
"Russ Bywater" <russbywater@gmail.com>
Tracking Status: None
"tapia_joseph@mnes-us.com" <tapia_joseph@mnes-us.com>
Tracking Status: None
"Monarque, Stephen" <Stephen.Monarque@nrc.gov>
Tracking Status: None
"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>
Tracking Status: None

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Files	Size	Date & Time
MESSAGE	3794	11/8/2011 5:08:25 PM

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