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December 6, 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. 6135
(SECTION 1.0)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein the response to Request for Additional Information (RAI) No. 6135 (CP RAI #236) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The RAI response addresses conformance with Regulatory Guide 1.143.

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 December 6, 2011.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: Response to Request for Additional Information No. 6135 (CP RAI #236)

DO90
K110

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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.: 6135 (CP RAI #236)

SRP SECTION: 01 - Introduction and Interfaces

QUESTIONS for Health Physics Branch (CHPB)

DATE OF RAI ISSUE: 11/2/2011

QUESTION NO.: 01-8

The guidance described in NUREG-0800 Standard Review Plan, Chapter 1.0, 'Introductions and Interfaces,' step 9 specifies that FSAR chapter 1 of the combined license application include an identification and description of deviations from the guidance contained in the regulatory guides (RG) with appropriate references to the FSAR sections where they are addressed.

Based on the NRC staff's review of COLA FSAR Chapter 1, Section 1.9, 'Conformance with Regulatory Criteria,' the staff has determined that the applicant did not include RG 1.143, 'Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water Cooled Nuclear Power Plants,' in the COLA FSAR Table 1.9-201. This RG is referenced in Chapter 11 of the COLA FSAR. 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.

ANSWER:

RG 1.143 has been added to FSAR Table 1.9-201 to reflect full conformance. Full conformance applies to the site-specific design and operation information for mobile equipment in the liquid waste management system (LWMS) and solid waste management system (SWMS) added to the FSAR in COLA Revision 2 (Subsections 11.2.1.6, 11.4.1.6, and 11.4.4.5).

RG 1.143 does not apply to the design of the evaporation pond because the evaporation pond is not part of the LWMS, as stated in the response to RAI No. 3398 (CP RAI #49) Question 11.02-8 (ML093370112). RG 1.143 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.

The evaporation pond is downstream from the "controlled discharge to the environment". Therefore, it is not part of the radwaste system, is not subject to RG 1.143, and no exception is taken to RG 1.143.

This agrees with a statement in the CPNPP Units 3 and 4 Safety Evaluation with Open Items on page 11-13 that states, in part, "Because the evaporation pond is not part of the LWMS considering the guidance in SRP Section 14.3.7 and RG 1.143...". During a clarification call with the NRC staff on November 16, 2011, the staff confirmed that RG 1.143 is not applicable to the evaporation pond and no exception to RG 1.143 is necessary.

Impact on R-COLA

See attached marked-up FSAR Revision 2 page 1.9-11.

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 1.9-201 (Sheet 8 of 13)

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	
1.143	<u>Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants</u>	<u>Revision 2 November 2001</u>	<u>Conformance</u>	<u>3.2 11.2.1.6 11.2.3.1 11.4.1.6 11.4.4.5</u>	RCOL2_01-8
1.145	Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants	Revision 1 November 1982	Conformance	2.3.4	
1.147	In-service Inspection Code Case Acceptability, ASME Section XI, Division 1	Revision 15 October 2007	Conformance	3.8.1.7 5.2.1.2	
1.149	Nuclear Power Plant Simulation Facilities for Use in Operator Training and License Examinations	Revision 3 October 2001	Conformance	13.2	
1.150	Ultrasonic Testing of Reactor Vessel Welds During Preservice and In-service Examinations	Revision 1 February 1983	Not applicable (This RG has been withdrawn by NRC.)	N/A	
1.159	Assuring the Availability of Funds for Decommissioning Nuclear Reactors	Revision 1 October 2003	Not applicable (This RG is outside the scope of the FSAR. COLA Part 1 addresses this information.)	N/A	
1.160	Monitoring the Effectiveness of Maintenance at Nuclear Power Plants	Revision 2 March 1997	Conformance	3.8.4.7 17.6	
1.161	Evaluation of Reactor Pressure Vessels with Charpy Upper-Shelf Energy Less Than 50 Ft-Lb	Revision 0 June 1995	Not applicable (Materials for new units are procured with specifications so that the expected USE will be greater than 50 ft-lb throughout the reactor pressure vessel life.)	N/A	