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CP-201101661  
Log # TXNB-11086

Ref. # 10 CFR 52  
10 CFR 2.390

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

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein supplemental information for the response to Request for Additional Information (RAI) CP RAI #198 for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The supplemental information addresses Bulletin 2005-01 and the special nuclear material physical protection plan.

Attachment 2 to this letter contains Security-Related Information and should be withheld from public disclosure. This letter is unclassified upon removal of Attachment 2.

Should you have any questions regarding this response, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

Attachment 2 to this letter completes Regulatory Commitments #8272 and #8273 from letter TXNB-11029 dated May 6, 2011 (ML11129A156). There are no new commitments in this letter.

I state under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2011.

Sincerely,

Luminant Generation Company LLC

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

Rafael Flores

Attachment 1: Supplemental Response to Request for Additional Information No. CP RAI #198

Attachment 2: Comanche Peak Nuclear Power Plant Units 3 and 4 Special Nuclear Material (SNM) Physical Protection Program Description, Revision 0, December 2011 (SRI)

DO90  
NRO

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U. S. Nuclear Regulatory Commission  
CP-201101661  
TXNB-11086  
12/8/2011

## **Attachment 1**

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

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**SUPPLEMENTAL 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.: CP RAI #198**

**QUESTIONS Related to Standard License Conditions for 10 CFR Parts 30, 40, and 70**

**DATE OF RAI ISSUE: 1/14/2011**

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**QUESTION NO.: 5 (in part)**

Part 1, Section 1.0, Introduction (Page 7) and Part 2, FSAR, Section 13.4, Operational Programs, Table 13.4-201 (Pages 13.4-1 to 13.4-4): Describe the physical protection and management controls for how nuclear material will be protected in accordance with the applicable requirements for 10 CFR Parts 30, 40, and 70, for the licenses to receive a title to, own, acquire, deliver, receive, possess, use, and/or transfer specific SNM types, form, enrichment, and quantities requested...

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**ANSWER:**

The response to this question (ML11129A156) stated that a separate letter would be forthcoming that would provide the SNM Physical Protection Program during the time that the requirements of 10 CFR 73.67 are in effect. That program description is provided in Attachment 2 (SRI) to this letter. The details of the program, such as SNM transfer operations and the SNM accountability plan, are included in the procedures that will be implemented in accordance with the milestone in FSAR Table 13.4-201. At that time, CPNPP Units 3 and 4 will adopt the SNM physical protection procedures that CPNPP Units 1 and 2 have been using successfully for many years.

Impact on R-COLA

None.

Impact on S-COLA

None; this response is site specific.

Impact on DCD

None.

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**SUPPLEMENTAL 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**

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**QUESTION NO.: 6 (in part)**

Part 1 Section 1.0 Introduction (Page 7) and Part 2, Section 13.4, Operational Programs, Table 13.4-201 (Pages 13.4-1 to 13.4-4): The applicant is requested to comply with the requirements of 10 CFR 70.22(b) for addressing material control and accounting of SNM by providing descriptions of how the applicable requirements for material accounting and controls under 10 CFR 74 will be met for the possession and storage of SNM during construction and prior to the operation of the nuclear power plant...

b. Luminant is also requested to revise COLA, Part 2, FSAR, Section 1.9, "Conformance with Regulatory Criteria," Table 1.9-220, "Evaluation of NRC Generic Communications Issued since March 2007 Revision of NUREG-0800, "to include NRC Bulletin 2005-01, "Material Control and Accounting at Reactors and Wet Spent Fuel Storage Facilities." In addition, Luminant is requested to provide a response to this bulletin for the COLA.

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**ANSWER:**

The response to this question (ML11129A156) stated that a response to Bulletin 2005-01 would be submitted in a separate letter. The portion of Bulletin 2005-01 applicable to CPNPP Units 3 and 4 is Part (ii)(b), provide a description of their SNM physical inventory and accounting processes. This description is included in the program description provided as Attachment 2 to this letter.

Impact on R-COLA

None.

Impact on S-COLA

None; this response is site specific.

Impact on DCD

None.