

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Tuesday, February 07, 2012 4:50 PM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; 'cp34-rai-luminant@mnes-us.com'; Eric.Evans@luminant.com; joseph tapia; 'Kazuya Hayashi'; Matthew.Weeks@luminant.com; 'Russ Bywater'; MNES RAI mailbox (cp34-rai-luminant@mnes-us.com)  
**Cc:** ComanchePeakCOL Resource  
**Subject:** Comanche Peak RCOL Chapter 1 - RAI Number 246 - Parts 30 40 and 70  
**Attachments:** RAI 6310 (RAI 246).docx

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 **February 7, 2012**.

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

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 1614

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**Subject:** Comanche Peak RCOL Chapter 1 - RAI Number 246 - Parts 30 40 and 70  
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**Received Date:** 2/7/2012 4:50:31 PM  
**From:** Monarque, Stephen

**Created By:** Stephen.Monarque@nrc.gov

**Recipients:**

"ComanchePeakCOL Resource" <ComanchePeakCOL.Resource@nrc.gov>

Tracking Status: None

"John.Only@luminant.com" <John.Only@luminant.com>

Tracking Status: None

"Donald.Woodlan@luminant.com" <Donald.Woodlan@luminant.com>

Tracking Status: None

"cp34-rai-luminant@mnes-us.com" <cp34-rai-luminant@mnes-us.com>

Tracking Status: None

"Eric.Evans@luminant.com" <Eric.Evans@luminant.com>

Tracking Status: None

"joseph tapia" <joseph\_tapia@mnes-us.com>

Tracking Status: None

"Kazuya Hayashi" <kazuya\_hayashi@mnes-us.com>

Tracking Status: None

"Matthew.Weeks@luminant.com" <Matthew.Weeks@luminant.com>

Tracking Status: None

"Russ Bywater" <russell\_bywater@mnes-us.com>

Tracking Status: None

"MNES RAI mailbox (cp34-rai-luminant@mnes-us.com)" <cp34-rai-luminant@mnes-us.com>

Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

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RAI 6310 (RAI 246).docx	22632	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Request for Additional Information (RAI) No. 6310, COLA Revision 2

RAI Letter Number 246

2/7/2012

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035  
SRP Section: 01 - Introduction and Interfaces  
Application Section: Chapter 1.0

QUESTIONS for Reactor Security and Programs Branch (NSIR/DRP/RSPLB)

01-9

**(U)** Provide information on the amount of uranium hexafluoride (UF6) to be utilized on-site. Provide information on where the UF6 will be stored, how much will be on-site, the enrichment, how it will be stored and transported on-site, what it will be used for, and how it will be processed. If UF6 is to be utilized on-site, additional information that satisfies the security requirements contained in the Interim Compensatory Measures Orders (ICMO) EA-03-225, dated March 6, 2003 [Safeguards Information] will be requested once the security review under 10 CFR Part 73.67 commences. In addition to the additional security requirements, a Critical Target Area (CTA) analysis must be completed and the results provided to the staff for review.

**(U)** Regulatory Basis: In accordance with 10 CFR 70.9(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects. In addition, in accordance with 10 CFR 70.23(a) an application for a license will be approved if the Commission determines that: (3) The applicant's proposed equipment and facilities are adequate to protect health and minimize danger to life or property.

This is a follow-up request for additional information to RAI 6209 (Letter Number 198) Question Number 4.

01-10

**(U)** Clarify the following points in your Part 11 submittal dated May 6, 2011, titled *Special Nuclear Material (SNM) Control and Accounting (MC&A) Program Description* Revision 0:

1. Page MC&A-3 states the SNM custodian is responsible for the functions that relate to the control of SNM. What position has responsibility for the implementation of the SNM control and accounting function?

2. Page MC&A-4 states the accounting group maintains procedures for SNM in the plant's possession as required in 10 CFR 74.19(b). Which group is responsible for maintaining records as required under 10 CFR 74.19(d)?

3. Page MC&A-5, *Unit of Control*, states that units of SNM that require control are the items defined in paragraph 2.6. Is 2.6 the correct reference since that is the definition for *item control area*? Did you mean to refer generically to 2.0 since several definitions contain SNM that would require control or to another specific definition such as 2.5?

4. Please clarify the following information in your May 6, 2011 submittal, Part 7: Your exemption request to 10 CFR 70.22(b), 70.32(c) and the associated parts of 74 is titled, "Basis for Exemption from 10 CFR 50.71(e)(3)(iii)." Request you review this and re-title page 1-1 to reflect the topic of the exemption request.

**(U) Regulatory Basis:** The applicant requests a material license pursuant to 10 CFR 30, 10 CFR 40, and 10 CFR 70. In regards to clarification and additional information requested above, 10 CFR 70.9 *Completeness and accuracy of information* states in part: (a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

10 CFR 70.22, *Content of Applications* states the following in (d) and (e):

(d) The Commission may at any time after the filing of the original application, and before the expiration of the license, require further statements in order to enable the Commission to determine whether the application should be granted or denied or whether a license should be modified or revoked. All applications and statements shall be signed by the applicant or licensee or a corporate officer thereof.

(e) Each application and statement shall contain complete and accurate disclosure as to all matters and things required to be disclosed.

This is a follow-up request for additional information to RAI 6209 (RAI Letter Number 198), Question Number 6

01-11

**(U)** Provide specifics regarding non-fuel special nuclear material (SNM), the chemical or physical form, and the maximum amount at any one time for the requested material license under Title 10, Code of Federal Regulation (CFR) Parts 30, 40, and 70. Provide specific material information in accordance with requirements for 10 CFR 30.32, 10 CFR 40.31, and 10 CFR 70.21 and 70.22. Specific to the request for a SNM licensed pursuant to 10 CFR 70, identify the types of non-fuel SNM that is planned to be used, how it is to be used, and the quantities of SNM associated with these usages.

**(U) Regulatory Basis:** The applicant requests a material license pursuant to 10 CFR 30, 10 CFR 40, and 10 CFR 70 in Part 1, Section 1.1.3, to receive possess, and use byproduct, source, and SNM. The applicant is required to provide specific descriptions of the nuclear materials to include the types, chemical or physical form, and the maximum quantities, in accordance with the applicable requirements of 10 CFR 30, 10 CFR 40, and 10 CFR 70 for the license requested. Title 10 CFR 30.32 and 10 CFR 40.31 for license of byproduct and source material requires the applicant to include specific information of nuclear material requested and their use or purpose for the license. In accordance with 10 CFR 70.22(a)(4), applicants must include, the name, amount, and specifications (including the chemical and physical form and, where applicable, isotopic

content) of the special nuclear material the applicant request to possess and use for a 10 CFR Part 70 license.

This is a follow-up RAI to RAI 6209 (RAI Letter Number 198) Question 5.