

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Monday, May 21, 2012 2:10 PM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; 'cp34-rai-luminant@mnes-us.com'; Eric.Evans@luminant.com; joseph tapia; 'Kazuya Hayashi'; 'Russ Bywater'; MNES RAI mailbox (cp34-rai-luminant@mnes-us.com); na3raidommailbox@dom.com  
**Cc:** ComanchePeakCOL Resource; Takacs, Michael  
**Subject:** Comanche Peak RCOL Chapter 13 Section 13.3 - RAI Number 258 -  
**Attachments:** RAI 6449 (RAI 258).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 **May 21, 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:** 1688

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**Subject:** Comanche Peak RCOL Chapter 13 Section 13.3 - RAI Number 258 -  
**Sent Date:** 5/21/2012 2:10:21 PM  
**Received Date:** 5/21/2012 2:10:24 PM  
**From:** Monarque, Stephen

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

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Tracking Status: None

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RAI 6449 (RAI 258).docx	21389	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Request for Additional Information (RAI) No. 6449, COLA Revision 2

RAI Letter Number 258

5/21/2012

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035  
SRP Section: 13.03 - Emergency Planning  
Application Section: Part 5: Emergency Planning

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

13.03-43

Open Item-13.03-13: Emergency Action Levels (EALs)

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50

In its September 16, 2010, response to RAI No. 3295 (ADAMS Accession No. ML102630014), Luminant provided a table (entitled "EAL Differences and Deviations from NEI Guidance") that identifies differences between the proposed Comanche Peak Units 3 and 4 emergency action levels (EALs) and NRC-endorsed NEI 99-01 (Revision 5) and NEI 07-01 (Revision 0). The staff has determined that additional information is needed in regard to the level of detail in the table associated with the differences from NEI 99-01 that relate to digital instrumentation and control (I&C) EALs given that Luminant has not committed to a specific digital I&C platform. Specifically, for referenced EALs associated with digital I&C (i.e., EALs: CU7, CA7, SA7, and SS7), provide – as a supplement to the table – the proposed new EALs, or EAL sets, in the same format as NEI 07-01, which include (as applicable) the initiating condition, operating modes, notes, EAL threshold(s), basis information, and developer guidance for how a particular set-point is (or will be) determined. Revise the table, as appropriate, to address these four EALs. It should be noted that initiating conditions CU7 and SA7 should be identical and based upon a partial loss of digital I&C (currently SA7 is based upon a full loss of digital I&C and therefore should be revised). In addition, initiating conditions CA7 and SS7 should be identical and based upon a full loss of digital I&C. Please revise accordingly or provide justification of why this is not necessary.

13.03-44

Open Item-13.03-14: Emergency Action Levels (EALs)

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50

On page II-36, within Section D "Emergency Classification System" of Revision 2 of the CPNPP 3 and 4 Emergency Plan it states "the classification system is not intended to include minor deviations during normal operation." Please justify this statement, as it is not the staff's position to discard consideration of emergency classifications should an applicant consider those classifications to be "minor deviations." There are EALs within the 99-01 Rev. 5 EAL scheme that specifically allow for minor deviations by the inclusion

of a timing statement, but this information must be sufficiently justified, submitted for review, and approved by the NRC staff. Please revise Section D of the CPNPP 3 and 4 Emergency Plan accordingly or provide justification of why this is not necessary.

#### 13.03-45

Open Item-13.03-15: Emergency Action Levels (EALs)

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50

In letter dated September 16, 2010, Luminant provided supplemental information for response to request for additional information (RAI) NO. 3295 dated November 18, 2009. The supplemental information involved the Emergency Action Levels in the Emergency Plan and the additional information supplemented Luminant letter TXNB-10019 submitted on March 5, 2010 (ADAMS Accession No ML100700262). Upon the staff's review of the supplemental information provided, the staff has determined that the justification for the revision of the initiating conditions for SU3, CU2, HA1, AU1, AA1, AS1, AG1, HU1, and SU8 needs to be enhanced in order for the staff to reach an independent decision of reasonable assurance. Please revise accordingly or provide justification of why this is not necessary.