

## PMComanchePeakPEm Resource

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**Sent:** Wednesday, June 20, 2012 8:47 AM  
**To:** Monarque, Stephen; ComanchePeakCOL Resource; Galvin, Dennis; Kallan, Paul; Otto, Ngola; Patel, Chandu; Reyes, Ruth; Roy, Tarun; Takacs, Michael; Vokoun, Patricia; Ward, William; Ciocco, Jeff  
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**Subject:** 2012-06-20 Woodlan, COLA Conference Call Talking Points  
**Attachments:** 2012-06-20 Talking Points.pdf; 2012-06-20 Responded Questions by age.pdf; 2012-06-20 Confirmatory Questions.pdf

Steve,

Attached are the talking points for today's COLA conference call.

**Donald R. Woodlan**

Manager, Nuclear Regulatory Affairs

**Luminant Power**

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**Subject:** 2012-06-20 Woodlan, COLA Conference Call Talking Points  
**Sent Date:** 6/20/2012 8:46:47 AM  
**Received Date:** 6/20/2012 8:48:20 AM  
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MESSAGE	726	6/20/2012 8:48:20 AM

2012-06-20 Talking Points.pdf	212873	
2012-06-20 Responded Questions by age.pdf		64688
2012-06-20 Confirmatory Questions.pdf		66530

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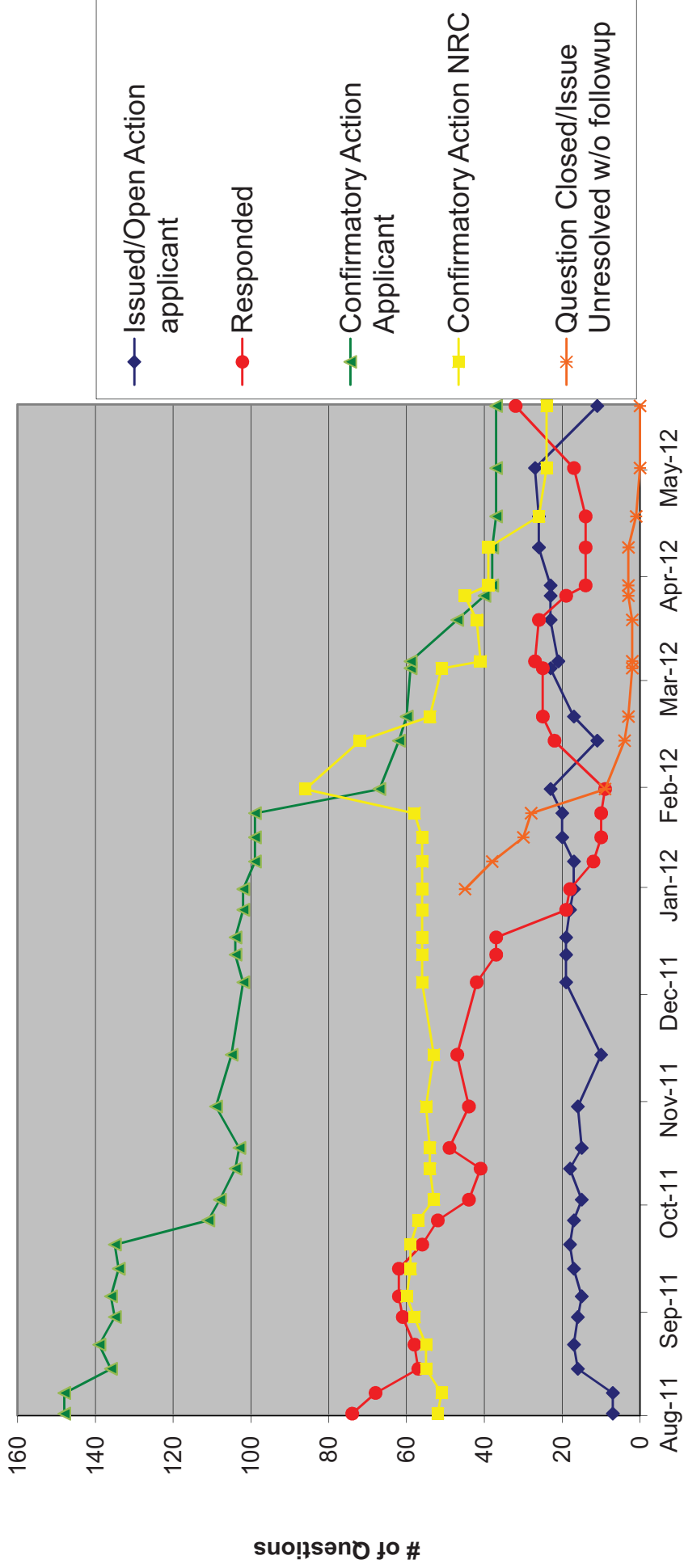
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**2012-06-20 RAI Trends**

The number of Responded RAIs went up and the number of Issued RAIs went down as Luminant submitted RAI responses.

No questions in the Closed/Issued Unresolved without follow-up category.

**eRAI Question Status Trends**



2012-06-20 Talking Points  
 Based on eRAI table dated 6/18/12  
 Page 1 of 11

# Licensing Conference Calls

Cancel Filter

	Title ▼▲	Description	PM Status Update	Action Required	Date ▼▲
<b>00 Misc (8)</b>					
<b>010 Logistics (2)</b>					
	WCR Petition	A petition has been filed in 19 proceedings to hold in abeyance decisions in all pending reactor licensing proceedings based upon the recent court decision which vacated the waste confidence rule, 10 CFR 51.23.		<b>Luminant to answer petition within 10 days.</b>	6/25/2012
	COLA Revision 3			<b>Luminant submit COLA revision 3.</b>	6/29/2012
<b>045 Recent Letters (4)</b>					
	TXNB-12014 COLA Part 10 ITAAC R2 UTR R0	Provides Update Tracking Report Revision 0 to COLA Part 10, ITAAC and License Conditions, Revision 2 in preparation for issuing COLA Revision 3.		None.	5/21/2012
	TXNB-12015 TS R2 UTR R0	Provides Updated Tracking Report Revision 0 for part 4, the tech specs, for the COLA in preparation for issuing COLA revision 3.		<b>None.</b>	5/31/2012
	TXNB-12017 ER R2 UTR R0	Provides Update Tracking Report Revision 0 for Environmental Report Revision 2 in preparation for COLA Revision 3.		None	5/31/2012
	TXNB-12020 FSAR R2 UTR R1	Submits Update Tracking Report Revision 1 to the FSAR R2.		None. Supports development of FSAR R3.	6/11/2012
<b>090 Action CPNPP (1)</b>					
	Regulatory Commitments List	Periodically confirm with NRO the list of reg commitments. A report re closed commitments provided Quarterly.	4/20/2010 (TXNB-10033), 7/28/2010 (TXNB-10054), 1/31/2001 (TXNB-11007), 4/25/11 (TXNB-11028), 7/29/11 (TXNB-11051), 10/25/11 (TXNB-11070), 1/30/12 (TXNB-12004), 4/23/12 (TXNB-12011)	<b>Luminant provide July 2012 update.</b>	7/31/2012
<b>120 ACRS (1)</b>					
	ACRS	<p>* Chap 15 (DCD, COLA and Topicals) [July 9-10], 2012</p> <p>*ACRS full committee changed to July (10?) 2012. CPNPP COLA may be included.</p> <p>* Chap 13 (COLA) August 14, 2012 (8am to 10am) - tentative.</p>	<p>* Chap 5 (1/2 day), May 27 - COMPLETE.</p> <p>* Chap 8, 10 Aug 17-18 - COMPLETE</p> <p>* Chap 11, 12, &amp; PRA Briefing (NRC), Oct 20 - COMPLETE</p> <p>Chapter 2 will be in two parts. 2.0 to 2.3 will be first and the rest of Chapter 2 later. SER for 2.0 to 2.3 expected in February or Early March 2012.</p>	<b>NRC - continue to provide updated schedules.</b>	

<p>Subcommittee Meeting Schedule</p>	<p><b>* DCD Chap 15 Non-LOCA Topical, tentatively October 2012</b>  <b>* Chap 4 (DCD &amp; COLA), September 20 &amp; 21, 2012</b>  <b>* Chap 7 (DCD and RCOLA) [Nov 15 &amp; 16], 2012</b></p>	<p><b>* Adv Accumulator DCD briefing - TBD</b>  <b>* Chap 18 (DCD &amp; COLA), TBD (tentatively 12/18-19/2012)</b>  <b>* Chap 17 &amp; 19 DCD, tentatively Feb [21-22,]2013</b>  <b>* Chap 6 DCD, tentatively March 21 &amp; 22, 2012 for DCD and COLA</b>  <b>* Chap 14 DCD, tentatively April [25-26,] 2013 COLA TBD</b>  <b>*Chap 3, DCD TBD, COLA TBD</b>  <b>* Chap 1, 2, 9, 16 , TBD</b></p>	<p><b>Provide presentation to ACRS staff.</b></p> <p>2012-06-20 Talking Points Page 2 of 11</p> <p>6/29/2012</p>
<p><b>01 (3)</b></p>			
<p><b>030 Issued RAIs (2)</b></p>			
<p>01 Construction Impacts</p>	<p>NRC is considering an RAI re section 1.10 on construction impacts. Will be based on ISG-22 which is in draft. Luminant updated the FSAR re construction impacts on operations via TXNB-11090, FSAR R2 UTR R0, dated 12/20/11.</p>	<p>3/14/12 Update, ISG may get issued in March 2012.</p>	<p>After ISG-22 is finalized, NRC will assess information in Section 1.10 of the FSAR and draft an RAI if needed . No projected date as of yet.</p>
<p>01 RAI-154 (4494) DCD Reference</p>	<p>Question 01-3. Luminant to supplement COL FSAR to incorporate certified version of US-APWR DCD.</p>	<p><b>Question 01-3.</b> This RAI is the closure path for OI 01-1</p>	<p><b>Luminant respond after US-APWR certification is complete.</b></p> <p>6/30/2014</p>
<p><b>035 Responded RAIs (1)</b></p>			
<p>01 RAI-246 (6310) Part 30, 40 and 70 Licenses</p>	<p>Questions 01-9, 10 and 11. This is a followup to RAI-198. Questions 9 - UF6 amounts re security Question 10 - MC&amp;A Program Question 11 - SNM type and amounts Response submitted in TXNB-12007 dated 3/9/12.</p>	<p><b>2/29/12 Update - Staff needs confirmation that fuel SNM description is in FSAR. Woodlan provided email on 3/1/12.</b>  <b>4/27/12 Question 01-9 changed from Responded to Confirmatory Applicant.</b>  <b>4/25/12 Follow-up RAI expected.</b></p>	<p>NRC review responses.</p> <p>3/13/2012</p>
<p><b>02 (11)</b></p>			
<p><b>035 Responded RAIs (1)</b></p>			
<p>02.05.04 RAI-233 (6115) Groundwater impact on seismic</p>	<p>Question 02.05.04-26. Followup information regarding the impact of changing groundwater level on slopes and sliding. On 11/18, the NRC staff approved a new due date of 12/2/11. Luminant responded in TXNB-11081 on 12/1/11.</p>	<p>2/1/12 Update - NRC asked that Luminant resend the RAI response. 2/7/12 Luminant provided response and eRAI table changed Q 02.05.04-26 to Responded. Project status report says RAI-233 is confirmatory. 4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology. 4/27/2012 updated. Included in IHCP and response scheduled for 2/28/2012.</p>	<p><b>NRC update the eRAI table to show as confirmatory.</b></p> <p><b>Luminant to address/update as part of IHCP and scheduled date for supplemental response is 2/28/2013.</b></p> <p>4/30/2012</p>
<p><b>042 Audit Open Items (1)</b></p>			
<p>02.04.12-6 DCD Compliance Open Item</p>	<p><b>Potential impact of seismic event on groundwater level</b> Need: Address potential impact of seismic event on groundwater level. Not on NRC project status list as of</p>	<p>NRC issued a white paper 10/12/11. Conf call planned for 10/26/11. In lieu of a conference call, a public meeting is planned for 3/20/12. 2/14/12 Update: Question 02.04.12-9 (RAI-147) is the follow-up question and the eRAI table shows the status as Confirmatory.</p>	<p><b>NRC to review. NRC provide update at 5/24 public meeting. (Update still needed.)</b></p> <p>11/17/2011</p>

7/5/2011. See TXNB-11046 dated 7/14/2011.	2/29/12 Update - NRC feels issue is closed but has not determined best method to so indicate. 5/9/12 Update - NRC to discuss during 5/24 public meeting.	2012-06-20 Talking Points Page 3 of 11
<b>075 Conference Calls (1)</b>		
Ground Water Modeling	To describe/discuss assumptions made and how they are being used in the Groundwater Modeling system (GMS) model for IHCP and get early feedback of any NRC concerns.	Luminant to provide talking points by Monday, June 25, 2012. Call to address groundwater only.  7/11/2012
<b>090 Action CPNPP (8)</b>		
02.04.02-1 Surface Flooding Open Item	<b>Onsite Flooding from potential Intense Precipitation.</b> Need: Weakness in surface flooding calc need to be addressed. Luminant submitted an updated response via TXNB-11066 on 10/21/11. RAI-139 S01 (Q 02.04.02-2).	NRC issued a white paper 10/12/11. Conf call held on 12/1/11. Calculations are impacted by standard plant layout changes and will need to be updated. 2/14/12 Update - RAI-139 is now confirmatory in eRAI Table. 4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology.  12/31/2012 <b>Luminant to address/update as part of IHCP in a supplement to RAI-139.</b>
02.04.10-1 Surface Flooding Open Item	<b>Surface Flooding</b> Need: Discussion re erosion due to onsite flooding and drainage, the impact of 3 & 4 drainage on 1 & 2 (boundary), and ongoing actions to ensure design drainage remains available (e.g., surveillances, operation observations, housekeeping) RAI-139 S01 (Q 02.04.02-2). RAI-139 supplement issued 10/21/11 via TXNB-11066.	NRC issued a white paper 10/12/11. Conf call held 12/1/11. Calculations are impacted by standard plant layout changes and will need to be updated. 2/14/12 Update - RAI-139 is now confirmatory in eRAI Table. 4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology.  12/31/2012 <b>Luminant to address/update as part of IHCP.</b>
RAI-233 Stability	Supplement response to RAI-233, revise FSAR 2.5.4 and 2.5.5, and update settlement and bearing capacity, stability of sloper and laterla earth pressure analysis.	<b>Luminant submit revised response to RAI-233 and address other stability and structural issues.</b>  2/28/2013
02.04.12-1 Groundwater Open Item	Luminant, prepared and submitted an overarching description. Luminant supplemented <b>RAI-147 (S02), Q 02.04.12-8</b> re ground water flow in Glen Rose Formation. Response to <b>RAI-22 Q 02.04.05-11</b> revised to properly reflect groundwater level. See TXNB-11057 dated 8/29/2011. Supp 03 provided by TXNB-11082 on 11/28/11 and included fill properties and extent of above ground fill.	<b>Luminant to address/update as part of IHCP including a supplemental response to RAI-147. Luminant to include input/output files for MODFLOW model. Update FSAR 2.4.12.</b>  3/29/2013
02.04.12-3 Groundwater	<b>Groundwater in existing soil structure</b> Need: Address different interpretations re groundwater in existing soil based on slow rise of level in some monitoring wells. Luminant, incorporate alternate	<b>Luminant to address/update as part of IHCP as part of supplement</b>  3/29/2013

Open Item	interpretations re groundwater in overarching description. Luminant supplement RAI-147 (S02), Q 02.04.12-9 re shallow ground water. See TXNB-11057 dated 8/29/2011.	confirmatory. 4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology. 4/26/12 update. Luminant provided an updated white paper to NRC and asked for a conference call.	to RAI-147.  2012-06-20 Talking Points Page 4 of 11
02.04.12-4 Leakage Paths Open Item	<b>Potential error in calculation</b> Luminant has provided a clarification which was included in COLA Rev. 2 dated 6/28/11.	NRC issued a white paper 10/12/11. Conf call planned for 10/26/11. In lieu of conference call, public meeting planned for 3/20/12.  2/14/12 Update: All RAI-145 questions are now Confirmatory.  4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology.	Luminant to address/update as part of IHCP including a supplement to RAI-145. Luminant to provide input/output files for RESRAD model. Update FSAR 2.3.13.  3/29/2013
02.04.12-5 and 02.04.13-2 Vertical Flow Paths Open Item	<b>Potential vertical leakage path</b> Need: Quantitative assessment of a vertical leakage path to groundwater below. Luminant, pursue options to provide quantitative assessment. RAI-145, Q 2.4.13-5, 6, and 7. See TXNB-11057 dated 8/29/2011.	NRC issued a white paper 10/12/11. Conf call held 10/26/11. In lieu of conference call, a public meeting is scheduled for 3/20/12.  2/14/12 Update: All RAI-145 questions are now Confirmatory.  4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology.	Luminant to address/update as part of IHCP and as part of the supplement to RAI-145.  3/29/2013
02.04.13-3 RAI-145 Open Item	<b>Horizontal Leakage Path for Tank Failure</b> Need: Overarching description of leakage path and basis for assumptions used in the analysis. A description of the physics involved in assessing the leakage path. Areas of interest include groundwater dilution assumptions, SCR dilution assumptions, and effects of any installed drainage systems. Luminant prepared and provided an overarching description of the horizontal leakage path, to discuss the physics involved and to identify and justify assumptions used. RAI-145 S01, Q2.4.13-5, 6 & 7. See TXNB-11057 dated 8/29/2011.	NRC preparing detailed comments to be followed by a conference call (10/26). In lieu of a conference call, a public meeting is scheduled for 3/20/12.  2/14/12 Update: eRAI table shows the status for Question 02.04.13-3 as Resolved/Closed. Questions 5, 6, and 7 are shown as Confirmatory.  4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology.	Luminant to address/update as part of IHCP and as part of supplement to RAI-145.  3/29/2013
<b>03 (18)</b>			
<b>030 Issued RAIs (1)</b>			
03.03.02 RAI-250 (6342) Hurricane Missiles	One question, 03.03.02-9. Relates to a new regulatory guide on hurricane winds.	This question is linked to a DCD question. Luminant should not answer until the DCD formal response is submitted. Extension granted to 5/24/12. 5/9/12, extension granted to 6/26/12.  This RAI is linked to the final response from MHI to RAIs (908-6327 and 907-6321) related to RG 1.221 R0 which are scheduled to be submitted by the end of August 2012. Luminant expects to submit its response by September 14, 2012. 2012-06-19 - due date moved to 9/14/12.	Luminant respond to RAI.  9/14/2012



**035 Responded RAIs (2)**

<p>03.11 RAI-239 (6159) EQ Followup - Questions 03.11-18, 19 and 20</p>	<p>Q 03.11-18 followup to Q 03.11-1. The NRC is preparing a followup question to 03.09.06-13 which is very similar to this question. Q 03.11-19 followup to Q 03.11-2. Describe the transition from the initial EQ program to the EQ program to be implemented during plant operation. Q 03.11-20 followup to Q 03.11-11. License condition for program implementation. 12/15, NRC granted extension to 1/31/2012. Response submitted via TXNB-12006 on 2/27/12.</p>	<p>Luminant to prepare a generic license condition of operational program inspection activity. 4/27/12 Question 03.11-20 changed from responded to confirmatory applicant.</p>	<p><b>NRC review response.</b></p> <p>2/29/2012</p>	<p>2012-06-20 Talking Points Page 5 of 11</p>
<p>03.09.06 RAI-244 (6222) IST</p>	<p>Questions 03.09.06-21, 22, and 23. Relate to IST and procurement specifications. Will be answered along with RAI-239. Due date extended to 1/31/2012 to be consistent with RAI-239. Clarifying conference call held. Response submitted via TXNB-12006 on 2/27/12 for questions 21 and 23. Response to question 22 submitted via TXNB-12007 dated 3/9/12. TXNB-12021 dated 6/13/12 provided a supplemental response to question 22 (to correct the revision level of NUREG-1482).</p>	<p>Also being tracked as three open items. Linked to a DCD question. Extended to 2/29/12 awaiting final DCD response. Question 03.09.06-22 is delayed until 3/30/12 awaiting final DCD mark-up in DCD response to an RAI. 4/3/12 update - Q22 changed from issued to responded 4/27/12 Question 23 changed from Responded to confirmatory applicant. NRC needs clarification re question 22.</p>	<p><b>NRC review responses.</b></p> <p>6/13/2012</p>	

**040 SER Open Items (4)**

<p>03.09.06-21 RAI-244 IST</p>	<p>Responded.</p>		<p><b>NRC review response.</b></p> <p>2/27/2012</p>	
<p>03.11-18 RAI-239 EQ Open Item</p>	<p>Responded</p>		<p><b>NRC review response.</b></p> <p>2/27/2012</p>	
<p>03.11-19 RAI-239 EQ Open Item</p>	<p>Responded.</p>		<p><b>NRC review response.</b></p> <p>2/27/2012</p>	
<p>03.09.06-22 RAI-244 IST</p>	<p>Supplemental response provided.</p>		<p><b>NRC review Luminant response.</b></p> <p>6/13/2012</p>	

**045 Recent Letters (1)**

<p>TXNB-12021 RAI-244(6222) IST</p>	<p>Corrects the revision level of NUREG-1482.</p>		<p><b>NRC review supplemental information.</b></p> <p>6/13/2012</p>	
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**090 Action CPNPP (10)**

<p>3-7-3-8-10 Evaluation of NI SSI</p>	<p>Evaluation of the NI Complex which shows that the site-specific SSI analysis results of NI Complex are enveloped by DCD SSI analysis results.</p>		<p><b>Luminant complete evaluation.</b></p> <p>9/28/2012</p>	
<p>3-7-3-8-20 FSAR R3 UTR R0</p>	<p>FSAR R3 UTR R0 to include: Updates to the plot plan (1.2 and 2.1); Atmospheric dispersion (2.3); Aircraft hazards (3.5); Main control room habitability (6.4); Grounding and lightning protection (8.3); HVAC (9.4); radiation protection (12.3); and PRA (19.1)</p>		<p><b>Luminant prepare and submit UTR.</b></p> <p>10/31/2012</p>	
<p>3-7-3-8-30 Physical Security Plan and High Assurance</p>	<p>Via separate letter, updates to the Physical Security Plan and High Assurance Evaluation will be developed to include plant layout</p>		<p><b>Luminant prepare and submit PSP updates. Luminant work with MHI re</b></p> <p>10/31/2012</p>	

	changes.			<b>Submittal of HAE update.</b>	
	UTR will contain the updates based on seismic closure plan including: text, table and figure updates to reflect common foundation and new plant layout (F2.1-1, F2.3-26, F2.3-27, F3.1-1, F3.4-3, F4.1-1, and F6.3-1); table update due to source or receptor location if needed (T5.4-1 and T5.4-3)			<b>Luminant prepare and submit UTR.</b>	2012-06-20 Talking Points Page 6 of 11 11/30/2012
	UTR to include: updates to reflect EPRI guidance for earthquake sources in the CEUS (2.5); Fire protection updates (9.5 and 9.A)			<b>Luminant prepare and submit UTR.</b>	2/28/2013
	Follow-up to RAI-226 questions: 03.07.02-26 is follow-up for 23 (items 2.5,6,7,9,10, and 13) 03.07.02-27 is follow-up for 24 (items 1,3,4,6,7,8 and 9)		The 2/14/12 eRAI Table listed RAI-226 questions 03.07.02-23 and 24 as Confirmatory Action NRC. 4/16/12 Update - Luminant has rolled the response to this RAI into the ISCP.	<b>Luminant prepare and submit responses.</b>	4/30/2013
	Updates to site-specific seismic analyses in 3.7, 3.8 and Appendices 3H, 3I, 3J, 3KK, 3LL, and 3MM)		3/17/12 Update - Currently Luminant believes that Appendices 3H, 3I, and 3J do not require update.	<b>Luminant prepare and submit UTR.</b>	4/30/2013
	Supplement response to RAI-221 to reflect updated site-specific seismic analysis.			<b>Luminant prepare and submit supplement.</b>	4/30/2013
	Supplement response to RAI-226 to reflect updated site-specific seismic analysis.			<b>Luminant prepare and submit supplement.</b>	4/30/2013
	UTR to include site-specific analysis of NI complies 3.7, 3.8 and Appendix 3NN).			<b>Luminant prepare and submit UTR.</b>	6/28/2013
<b>06 (4)</b>					
<b>035 Responded RAIs (1)</b>					
	Q 06.04-14 and 15. Control Room Habitability. A clarifying call was held on 12/13/11. Luminant needs more time to obtain, V&V and run ALOHA code. NRC approved extension to respond to 3/30/2012. Response provided via TXNB-12008 on 3/29/12. TXNB-12021 provided a missing figure from the original response.		Also being listed as two open items. 4/5 Q 14 and 15 Changed from issued to responded.	<b>NRC review Luminant's response.</b>	6/13/2012
<b>040 SER Open Items (2)</b>					
	06.04-14 RAI-240 CR Hab	Stated as Responded.		<b>NRC review Luminant's response.</b>	3/29/2012
	06.04-15 RAI-240 CR Hab	Stated as responded (4/5/12)		<b>NRC review Luminant's response.</b>	6/13/2012
<b>045 Recent Letters (1)</b>					
	TXNB-12021 RAI-240(6158) CRH	Supplement provided figure omitted from original response.		<b>NRC review response.</b>	6/13/2012
<b>08 (2)</b>					
<b>035 Responded RAIs (1)</b>					
			3/1/12 Woodlan - this is the third or fourth time we have addressed these issues. Regulatory basis is unclear. OPS for CPNPP is not committed to GDC 5.	<b>NRC consider position on</b>	

<p>08.01 RAI-249 (6316) Shared Offsite Elec</p>	<p>NRC is asking questions re GDC-5. One question, 08.01-3, with four parts. Response provided via TXNB-12013 dated 5/16/2012.</p>	<p>Future interactions may include public conference calls, public meetings or discussions during DCWG meetings. 3/29/12 Update - Clarifying conference call held. Luminant asked for more time to respond re GDC 5 concerns. NRC to reassess their position. Extension granted to 5/17/12. 4/26/12 - Clarifying call held with branch chief. NRC to provide position on GDC 5.</p>	<p>application of GDC 5 to offsite power systems.  NRC move question to responded status. NRC review responses.</p>	<p>2012-06-20 Talking Points Page 7 of 11</p>
<p><b>100 Action NRO (1)</b></p>				
<p>ACRS Questions re Chapter 8</p>	<p>The ACRS sub-committee has issued five questions resulting from their briefing on Chapter 8.</p>	<p>NRC will address but method has not been finalized. NRC may choose to ask RAIs to get applicant input.</p>	<p>NRC determine method to address questions.</p>	<p>3/30/2012</p>
<p><b>09 (9)</b></p>				
<p><b>035 Responded RAIs (2)</b></p>				
<p>09.02.01 RAI-251 (6348) ESWS</p>	<p>Questions 09.02.01-6 to 11. Q6 is a follow-up to RAI-109 Q1 Q7 is a follow-up to RAI-109 Q2 Part B Q8 to 10 are new and seem to be derived from DCD review. Luminant responded via TXNB-12016 on 5-31-12.</p>	<p>It is unexpected to get "follow-up" RAIs for questions which are statused as Resolved/Closed.  Luminant response development impacted by DCD ACRS presentation on Chapter 9. Extension granted to 5/11/12 update, NRC granted extension to 5/31/12.</p>	<p>NRC review responses.</p>	<p>5/31/2012</p>
<p>09.02.05 RAI-252 (6358) UHS</p>	<p>RAI-252 09.02.05-18 to 26 UHS Response submitted via TXNB-12018 on 6/7/12.</p>	<p>4/16 update, Luminant does not need a clarifying conference but needs an extension until 5/17/12. Extension granted 6/7/12.</p>	<p>NRC review response.</p>	<p>6/7/2012</p>
<p><b>040 SER Open Items (1)</b></p>				
<p>09.04.05-23 RAI-243 (6124) UHS Vent</p>	<p>Responded.</p>	<p>NRC review response.</p>	<p>Luminant to supplement response.</p>	<p>2/27/2012</p>
<p><b>045 Recent Letters (3)</b></p>				
<p>TXNB-12016 RAI-251(6348) ESWS</p>	<p>Responds to questions 09.02.01-6 to 11.</p>	<p>NRC review responses.</p>	<p>NRC review responses.</p>	<p>5/31/2012</p>
<p>TXNB-12018 RAI-252(6358) UHS Design</p>	<p>Responds to questions 09.02.05-18 to 26</p>	<p>NRC review responses.</p>	<p>NRC review responses.</p>	<p>6/7/2012</p>
<p>TXNB-12021 RAI-052 S01(3294) re Heavy Loads</p>	<p>Clarifies certain aspects of Heavy Loads program based on feedback from NRC staff.</p>	<p>NRC review supplemental information.</p>	<p>NRC review supplemental information.</p>	<p>6/13/2012</p>
<p><b>070 Site Visits/Audits (1)</b></p>				
<p>Chap 9 UHS Audit</p>	<p>NRC would like to conduct an audit of Chapter 9 UHS calculations in the July or August 2012 time frame. It will take one or two days. Location should allow maximum access to responsible SMEs.</p>	<p>4/11/12 update - Audit could be scheduled for June 2012. Luminant recommends the MNES offices in Arlington VA. Luminant requests the scope of the audit and proposed dates as soon as reasonable.</p>	<p>NRC propose specific dates and provide an audit scope as soon as reasonable.</p>	<p>6/29/2012</p>
<p><b>090 Action CPNPP (2)</b></p>				
<p></p>	<p>A conference call in 9.2.1 was held on 1/23/12 with the reviewer, Larry Wheeler. A</p>	<p>2/15/12 Update - NRC intends to issue RAIs to MHI on DCD.</p>	<p></p>	<p></p>

9.2.1 DCD Revisions	<p>series of issues (mostly clarifications and corrections) were discussed. In general, these issues need to be addressed in DCD and the FSAR will be updated to be consistent (RAI supplement or UTR).</p> <p>Questions 09-04-05-19 to 25.</p> <p>Q 19 if a followup to Q 12 and 14. Q 22 if a followup to Q 3, Q 23 if a followup to Q 5 and 17. Q 24 if a followup to Q 12 and 15. Q 25 if a followup to Q 10 and 18.</p> <p>Response submitted via TXNB-12006 on 2/27/12.</p>	<p><b>2/29/12 Update - NRC expects to issue RAI to DCD re the safety boundary and COL Item 9.2(7).</b></p> <p><b>3/12/12 Update - RAI 6344 issued in draft to DCD.</b></p> <p>Q23 listed as seven open item and Closed/Unresolved. Q25 is Resolved/Closed. Q19, 20, 21, 22 and 24 are CN-A <b>CU-Q</b> 09.04.05-23 ??</p> <p>5/9/12 update - NRC stated they would have an update the week of 5/14. Luminant is considering a redesign of portions of these rooms. Intendes to provide a response schedule by end of June 2012.</p>	<p><b>Luminant update FSAR per MHI response to related RAI.</b></p> <p><b>NRC review response.</b></p> <p><b>Luminant provide supplemental response to question 23 related to internal flooding.</b></p>	<p>4/30/2012</p> <p>2012-06-20 Talking Points Page 8 of 11</p> <p>6/29/2012</p>
<b>10 (1)</b>				
<b>035 Responded RAIs (1)</b>				
10.04.08 RAI-237 (6166) SGBD	Q 10.04.08-3 asks for additional details. TXNB-11084 dated 12/8/11 provides the Luminant response.	<b>2/28/12 Update - Linked to a DCD issue. Staff needs resolution on DCD issue first.</b>	<b>NRC review response.</b>	12/8/2011
<b>13 (3)</b>				
<b>030 Issued RAIs (1)</b>				
13.03 RAI-258 (6449) EALS	Questions 13.03-43, 44 and 45. Asking for more details.	Clarifying conference call held on 6/1/12. 2012-06-19 - Due date extended to 7/17/2012.	<b>Luminant respond to RAI.</b>	7/17/2012
<b>035 Responded RAIs (2)</b>				
13.04 RAI-255 (6447) Table Error	Question 13.04-6. Incorrect reference in Table 13.4-201. Response provided via TXNB-12013 dated 5/16/2012.	the reference to 52.78 appears to be a legacy reference and should have been deleted when part 52 was revised.	<b>NRC review response.</b>	5/16/2012
13.06.01 RAI-234 (6068) Security Followup	Questions 13.06.01-57 and 58. Followup questions concerning target sets and defense. Clarifying conference call held 11/2/11. Luminant to perform a table top. TXNB-11085 dated 12/8/11 provides the Luminant response. <b>Final resolution of the issues is tied to the HAE report which will be issued by Mitsubishi on the DCD docket after the standard plant layout is finalized. TXNB-12005 of 2/20/12 provided a submittal date of 10/31/12.</b>	2/15/12 Update - Discussed need to updated HAE one more time to address all layout changes and new scenarios based on this RAI response. <b>NRC intends to status as "Responded" until the HAE revision is received.</b>	<b>NRC Review response.</b> <b>Luminant provide HAE revision.</b>	10/31/2012
<b>14 (7)</b>				
<b>030 Issued RAIs (3)</b>				
14.02 RAI-257 (6457) UHS Testing	Question 14.02-21 re the testing of various UHS components. Somewhat repetitive of other RAI questions.	6/6/12 - luminant requested to extend Part 4 to August 24, 2012, and the remaining portions to June 22, 2012. 2012-06-19 - new due dates granted.	<b>Luminant respond to RAI.</b>	6/22/2012

14.03.07 RAI-254 (6403) Testing for UHS Components	Question 14.03.07-38 re testing (ITAAC?) for various UHS components.	Extension granted to 6/7/12. 6/6/12 - luminant requested to extend Parts 2 and 3 to August 24, 2012, and the remaining portions to June 22, 2012. 2012-06-19 - new due dates granted.	<b>Luminant provide response.</b>	6/22/2012
14.02 RAI-256 (6456) UHS Integrated Testing	Question 14.02-20. Integrated testing of the heat removal capability of the UHS.	6/6/12 - Luminant requested and received an extension to 7/20/12.	<b>Luminant submit response.</b>	7/20/2012
<b>035 Responded RAIs (1)</b>				
14.02 RAI-098 (3790) IST	<b>RAI-098, 14.02-15 to 16, Initial Test Prog</b> Answers submitted via TXNB-09064 on 1/11/09. Email of 2/27/12 requested more info on interlocks re UHS. Supplemental response provided by TXNB-12019 on 6/7/12.	14.02-15 Changed to Resolved Closed <b>CU-Q</b> <b>FU-Q</b> 14.02-16 Luminant to supplement RAI-256(6456) and 257(6457) are also follow-up RAIs to this question. 2/15/12 Update - NRC intends to develop a plan to address the question(s) for which no follow-up has been identified. Ngola sent email on 2/27 with areas in question 16 that need to be clarified. Luminant evaluating best approach to provide clarifications. 2012-04-03 Update. This supplement is potentially impacted by RAI-252 (Chapter 9). Supplement will not be submitted until that response is final. 2012-04-26 Update, NRC staff intends to issue two new RAIs as followup to Q 14.02-16.	<b>NRC review. NRC issue followup RAIs.</b>  <b>NRC review supplemental response.</b>	6/7/2012
<b>045 Recent Letters (1)</b>				
TXNB-12019 RAI-098 S01	Supplemental response to question 14.02-16 re UHS SSC testing of interlocks.		<b>NRC review supplemental response.</b>	6/7/2012
<b>075 Conference Calls (1)</b>				
ITAAC UHS Pump House Vent	NRC proposed a conference call to discuss Table A.2-1 Items 1.a and 1.b (AC), 2.c (ITA), 3.b (AC), 5.a (AC), and 6 (DC). Also wanted to discuss Table A.2-3 re Alarms, displays and control functions.		<b>Determine if call still needed and set date and time.</b>	6/20/2012
<b>090 Action CPNPP (1)</b>				
14.03 RAI-056 (2583) ASME ITAAC	RAI 56 14.3.3-1 to 4. ASME ITAAC 4 ques. Answers provided by TXNB-09058 dated 10/26/09. NRC provided a clarification re a needed ITAAC for design of components and piping.	Confirmatory: 1, 2 Resolved/Closed: 3 Closes/Unresolved: 4 CU-Q FU-Q 14.03.03-4 RAI-212 14.03.03-5 4/24 q 1 and 2 changed from CN-A to CN-N	<b>Luminant provide supplement (S01) to add ITAAC to address design of components and piping (to be modeled after similar DCD ITAAC).</b>	7/23/2012
<b>19 (5)</b>				
<b>030 Issued RAIs (1)</b>				
19-20 RAI-259 (6441) RITS External Events	Question 19-20 concerning external events in the RITS Methodology.	Luminant intends to provide response 6/22/12.	<b>Luminant respond to question.</b>	7/3/2012
<b>035 Responded RAIs (2)</b>				

<p>19 RAI-232 (6045) Screens External Events</p>	<p>Question 19-17 (7 parts), and 19-18 (5 parts). Relate to screens for external events and clarifications. These are follow-up questions to RAIs-165 and 166. Luminant needs to the 33 page table and address criterion used to screen external events. Refers to numerous other FSAR chapters and need to develop new discussions. 10/31/11 NRC granted an extension to 12/9/11. TXNB-11085 responded to RAI on 12/8/2011.</p>	<p>2/1/12 Update - status may to be changed to Closed/Unresolved in upcoming eRAI report. <b>2/28/12 Update - under review but no feedback yet.</b> <b>5/16/12 update - NRC to provide status in late May or early June.</b></p>	<p><b>NRC review response.</b> <b>NRC to provide feedback by 4/25/12 COLA conference call.</b></p>	<p>12/8/2011</p>
<p>19 RAI-248 (6320) Extreme Winds</p>	<p>One question, 19-19. This is a follow-up to RAI-210 (5069) question 19-14. Luminant responded via TXNB-12016 dated 6/7/12.</p>	<p>Question imposes new design requirements. Luminant will need to perform new assessments and PRA. NRC extended due date to 5/11/12. Luminant is coordinating with Dominion and Mitsubishi to develop a coordinated response. At this time, no clarifying call is needed. 5/9/12 update - NRC granted an extension to 5/31/12.</p>	<p><b>NRC review response.</b></p>	<p>5/31/2012</p>
<p><b>045 Recent Letters (1)</b></p>				
<p>TXNB-12016 RAI 248 (6320) Extreme Winds</p>	<p>Responds to question 19-19.</p>		<p><b>NRC review response.</b></p>	<p>5/31/2012</p>
<p><b>090 Action CPNPP (1)</b></p>				
<p>Provide figures for Mitigative Strategies</p>	<p>Provide the two figures which are part of the mitigative strategies report.</p>		<p><b>Luminant provide the figures in COLA revision 3.</b></p>	<p>6/29/2012</p>
<p><b>Part 01 Fin (1)</b></p>				
<p><b>090 Action CPNPP (1)</b></p>				
<p>Negotiation Action Plan</p>	<p>Discuss the potential for foreign influence. Call held on Thursday, 1/20, at 10am EST. Luminant assess NRC feedback and develop a plan to resolve. Luminant is standing by its submittal for now. Luminant is standing by the submitted plan at this time. May become an Open Item. Need to resolve before phase 6. Luminant submitted request to track as a Phase 2 Open Item on 7/28/11 (TXNB-11052).</p>		<p><b>Luminant to re-initiate review (approximately second quarter 2013).</b></p>	<p>6/29/2013</p>
<p><b>Part 03 ER (2)</b></p>				
<p><b>090 Action CPNPP (2)</b></p>				
<p>Potential alternate pipeline route</p>	<p>Luminant is exploring an alternate pipeline route based upon ability to obtain right-of-ways. The FSAR and ER have not been revised and may not be but Luminant wants to have alternatives identified and available. 5/19: Michael Willingham noted that any changes to the ER could affect the environmental review schedule.</p>		<p><b>Luminant determine if update required and inform NRC.</b></p>	<p>12/31/2012</p>
	<p>In March of 2010, Luminant informed the NRC that, due to actions by ERCOT, the studies (or</p>			

	<p>at least portions of the studies) regarding off-site power may need to be redone by Oncor. Some of the transmission lines or their routes may change. Some information may be available in the fall of 2010 but some final information may not be available until the spring of 2011.</p>	<p><b>Luminant keep NRC informed of update status. Subject of future drop in discussion with NRC.</b></p>	<p>12/31/2012</p>
<p><b>Part 10 ITAAC (1)</b></p>			
<p><b>100 Action NRO (1)</b></p>			
<p>Update NRO re Transmission Lines</p>	<p>License Conditions</p>	<p>Generic discussions are ongoing between the NRC Staff (Jerry Wilson) and the industry (NEI COL TF) re standard/typical license conditions. NRC staff is also looking at plant specific license conditions for CPNPP Units 3 and 4. A partial update was included in response to RAI-198 for 10 CFR 30, 40, and 70.</p>	<p><b>NRC, when time is appropriate, initiate discussion of license conditions for CPNPP Units 3 and 4.</b></p> <p>1/31/2013</p>

2012-06-20 Talking Points  
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Total: 75

2012-06-20 Responded questions sorted by age since response provided. Page 1 of 3

# Licensing Conference Calls



→	Title ▼▲	Description	RE ▼▲	PM Status Update	Action Required	Responded ▼▲
→	02.05.04 RAI-233 (6115) Groundwater impact on seismic	Question 02.05.04-26. Followup information regarding the impact of changing groundwater level on slopes and sliding. On 1/1/18, the NRC staff approved a new due date of 12/2/11. Luminant responded in TXNB-11081 on 12/1/11.	1	2/1/12 Update - NRC asked that Luminant resend the RAI response. 2/7/12 Luminant provided response and eRAI table changed Q 02.05.04-26 to Responded. Project status report says RAI-233 is confirmatory. 4/17/12 Update - Discussed during 3/27/12 Public Meeting on hydrology. 4/27/2012 updated. Included in IHCP and response scheduled for 2/28/2012.	<b>NRC update the eRAI table to show as confirmatory.</b> <b>Luminant to address/update as part of IHCP and scheduled date for supplemental response is 2/28/2013.</b>	12/1/2011
	10.04.08 RAI-237 (6166) SGBD	Q 10.04.08-3 asks for additional details. TXNB-11084 dated 12/8/11 provides the Luminant response.	1	<b>2/28/12 Update - Linked to a DCD issue. Staff needs resolution on DCD issue first.</b>	<b>NRC review response.</b>	12/8/2011
	13.06.01 RAI-234 (6068) Security Followup	Questions 13.06.01-57 and 58. Followup questions concerning target sets and defense. Clarifying conference call held 11/2/11. Luminant to perform a table top. TXNB-11085 dated 12/8/11 provides the Luminant response. <b>Final resolution of the issues is tied to the HAE report which will be issued by Mitsubishi on the DCD docket after the standard plant layout is finalized. TXNB-12005 of 2/20/12 provided a submittal date of 10/31/12.</b>	2	2/15/12 Update - Discussed need to updated HAE one more time to address all layout changes and new scenarios based on this RAI response. <b>NRC intends to status as "Responded" until the HAE revision is received.</b>	<b>NRC Review response.</b> <b>Luminant provide HAE revision.</b>	12/8/2011
	19 RAI-232 (6045) Screens External Events	Question 19-17 (7 parts), and 19-18 (5 parts). Relate to screens for external events and clarifications. These are follow-up questions to RAIs-165 and 166. Luminant needs to the 33 page table and address criterion used to screen external events. Refers to numerous other FSAR chapters and need to develop new discussions. 10/31/11 NRC granted an extension to 12/9/11. TXNB-11085 responded to RAI on 12/8/2011.	2	2/1/12 Update - status may to be changed to Closed/Unresolved in upcoming eRAI report. <b>2/28/12 Update - under review but no feedback yet.</b> <b>5/16/12 update - NRC to provide status in late May or early June.</b>	<b>NRC review response.</b> <b>NRC to provide feedback by 4/25/12 COLA conference call.</b>	12/8/2011
	03.11 RAI-239 (6159) EQ	Q 03.11-18 followup to Q 03.11-1. The NRC is preparing a followup question to 03.09.06-13 which is very similar to this question. Q 03.11-19 followup to Q 03.11-2. Describe the transition from the initial EQ program to the EQ program to be implemented during		Luminant to prepare a generic license condition of operational program inspection activity.	<b>NRC review response.</b>	



2012-06-20 Responded questions sorted by age since response provided. Page 2 of 3						
Followup - Questions 03.11-18, 19 and 20	plant operation. Q 03.11-20 followup to Q 03.11-11. License condition for program implementation. 12/15, NRC granted extension to 1/31/2012. Response submitted via TXNB-12006 on 2/27/12.	2	4/27/12 Question 03.11-20 changed from responded to confirmatory applicant.		2/27/2012	
01 RAI-246 (6310) Part 30, 40 and 70 Licenses	Questions 01-9, 10 and 11. This is a followup to RAI-198. Questions 9 - UF6 amounts re security Question 10 - MC&A Program Question 11 - SNM type and amounts Response submitted in TXNB-12007 dated 3/9/12.	2	<b>2/29/12 Update - Staff needs confirmation that fuel SNM description is in FSAR. Woodlan provided email on 3/1/12.</b> <b>4/27/12 Question 01-9 changed from Responded to Confirmatory Applicant.</b> <b>4/25/12 Follow-up RAI expected.</b>	3/1/12 Woodlan - this is the third or fourth time we have addressed these issues. Regulatory basis is unclear. OPS for CPNPP is not committed to GDC 5. Future interactions may include public conference calls, public meetings or discussions during DCWG meetings. 3/29/12 Update - Clarifying conference call held. Luminant asked for more time to respond re GDC 5 concerns. NRC to reassess their position. Extension granted to 5/17/12. 4/26/12 - Clarifying call held with branch chief. NRC to provide position on GDC 5.	3/9/2012	NRC review responses.
08.01 RAI-249 (6316) Shared Offsite Elec	NRC is asking questions re GDC-5. One question, 08.01-3, with four parts. Response provided via TXNB-12013 dated 5/16/2012.	1		NRC consider position on application of GDC 5 to offsite power systems. NRC move question to responded status. NRC review responses.	5/16/2012	
13.04 RAI-255 (6447) Table Error	Question 13.04-6. Incorrect reference in Table 13.4-201. Response provided via TXNB-12013 dated 5/16/2012.	1		NRC review response.	5/16/2012	
09.02.01 RAI-251 (6348) ESWS	Questions 09.02.01-6 to 11. Q6 is a follow-up to RAI-109 Q1 Q7 is a follow-up to RAI-109 Q2 Part B Q8 to 10 are new and seem to be derived from DCD review. Luminant responded via TXNB-12016 on 5-31-12.	6		NRC review responses.	5/31/2012	
09.02.05 RAI-252 (6358) UHS	RAI-252 09.02.05-18 to 26 UHS Response submitted via TXNB-12018 on 6/7/12.	9		NRC review response.	6/7/2012	
19 RAI-248 (6320) Extreme Winds	One question, 19-19. This is a follow-up to RAI-210 (5069) question 19-14. Luminant responded via TXNB-12016 dated 6/7/12.	1		NRC review response.	6/7/2012	

		2012-06-20 Responded questions sorted by age since response provided. Page 3 of 3	
		an extension to 5/31/12.	
03.09.06 RAI-244 (6222) IST	<p>Questions 03.09.06-21, 22, and 23. Relate to IST and procurement specifications. Will be answered along with RAI-239. Due date extended to 1/31/2012 to be consistent with RAI-239. Clarifying conference call held.</p> <p>Response submitted via TXNB-12006 on 2/27/12 for questions 21 and 23. Response to question 22 submitted via TXNB-12007 dated 3/9/12. TXNB-12021 dated 6/13/12 provided a supplemental response to question 22 (to correct the revision level of NUREG-1482).</p>	2	<p>Also being tracked as three open items. Linked to a DCD question. Extended to 2/29/12 awaiting final DCD response.</p> <p>Question 03.09.06-22 is delayed until 3/30/12 awaiting final DCD mark-up in DCD response to an RAI.</p> <p>4/3/12 update - Q22 changed from issued to responded</p> <p>4/27/12 Question 23 changed from Responded to confirmatory applicant. NRC needs clarification re question 22.</p> <p><b>NRC review responses.</b></p> <p>6/13/2012</p>
06.04 RAI-240 (6158) CRH Habit	<p>Q 06.04-14 and 15. Control Room Habitability. A clarifying call was held on 12/13/11. Luminant needs more time to obtain V&amp;V and run ALOHA code. NRC approved extension to respond to 3/30/2012. Response provided via TXNB-12008 on 3/29/12. TXNB-12021 provided a missing figure from the original response.</p>	2	<p>Also being listed as two open items.</p> <p>4/5 Q 14 and 15 Changed from issued to responded.</p> <p><b>NRC review Luminant's response.</b></p> <p>6/13/2012</p>
<b>Totals:</b>		<b>Sum: 32</b>	




















Total: 13

## Licensing Conference Calls

5 RAIs in Revision 2 or earlier (Not including Chap 2 or 3)  
37 RAIs to be included in COLA revision 3.

Added column for questions to be included in COLA revision 4.

 Cancel Filter

	Title 	CN R2 	CN R3 	CN R4 	Responded 	
						
	<b>01 (6)</b>					
	01 RAI-206 (5549) DCD References		1		5/20/2011	
	01 RAI-231 (6057) RG List		1		10/10/2011	
	01-7 RAI-235 (6137) Holder Items		1		11/14/2011	
	01-8 RAI-236 (6135) RG 1.143		1		12/6/2011	
	01 RAI-198 (5347) Parts 30, 40 and 70		2		12/8/2011	
	01 RAI-246 (6310) Part 30, 40 and 70 Licenses		1		3/9/2012	
	<b>02 (7)</b>					
	02.02.03 RAI-031 (2844) CR HVAC		1		10/15/2009	
	02.05.05 RAI-019 (2930) Stability of Slopes	1			10/28/2009	
	02.05.04 RAI-223 (5716) ITAAC Concrete Fill		1		7/28/2011	
	02.04.13, RAI-145(4315) Rad Liq Release		3		8/29/2011	
	02.04.02 RAI-139 (4309) Flood Calc		1		10/21/2011	
	02.04.12 RAI-147 (4314) Groundwater	4	1		11/28/2011	
	02.03.01 RAI-242 (6193) Met for UHS		1		1/9/2012	
	<b>03 (9)</b>					
	03.08.05 RAI-115 (2999) Foundations	3			11/13/2009	
	03.08.01 RAI-106 (2990) Conatinment Design	4			11/13/2009	
	03.07.02 RAI-060 (2879) Seismic	4			11/24/2009	
	03.02.02 RAI 180 (5090) Codes and Standards	1			11/18/2010	
	03.07.02 RAI-192(5255) Concrete	2			1/27/2011	
	03.07.02, RAI-221 (5798) SASSI and DCD Seismic		2		8/4/2011	
	03.09.06 RAI-228 (6027) IST Detail		1		11/7/2011	
	03.11 RAI-239 (6159) EQ Followup - Questions 03.11-18, 19 and 20		1		2/27/2012	
	03.09.06 RAI-244 (6222) IST		1		6/13/2012	
	<b>06 (1)</b>					
	06.04 RAI-216 (5652) HABIT Results		1		5/31/2011	
	<b>08 (1)</b>					
	08.02 RAI-182 (5116) Offsite Power		1		9/16/2011	
	<b>09 (3)</b>					
	09.05.02 RAI-196 (5369) Communications		1		8/4/2011	
	09.04.05 RAI-243 (6124) UHS Vent		5		2/27/2012	
	09.01.05 RAI-052 (3294) Heavy Loads		1		6/13/2012	
	<b>11 (2)</b>					
	11.04 RAI-039 (3401) LWMS		1		10/19/2009	
	11.02-18 RAI-224 (5854) Evap Pond Sampling		1		11/7/2011	
	<b>12 (3)</b>					
	12.03-12.04 RAI-099 (3511) Rad Prot Design Features	1			11/11/2009	
	12.3-12.4, RAI-135(4206), Contam Minimization		1		7/28/2011	
	12.03-12.04, RAI-225 (5981) Zinc Inj		1		9/16/2011	
	<b>14 (3)</b>					
	14.03 RAI-056 (2583) ASME ITAAC	2			10/26/2009	
	14.03.07 RAI-083 (3532) ITAAC	1			11/13/2009	
	14.03.07 RAI-245 (6265) Temp Sw Seismic		1		2/27/2012	
	<b>16 (1)</b>					
	16 RAI-091 (3315) TS Inst 3.3	1			11/11/2009	

**19 (3)**

19 RAI-191 (4986) Mitigative Strategies Report		1		1/31/2011	
19 RAI-093 (3729) SMA Methodology		1		10/27/2011	
19 RAI-230 (6001) RITS Methodology		1		4/18/2012	

**Totals:**Total: **39**