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August 29, 2012

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
COMBINED LICENSE APPLICATION PART 10, UPDATE TRACKING REPORT
REVISION 0

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein Update Tracking Report (UTR) Revision 0 for Part 10 of the Combined License Application (COLA) for Comanche Peak Nuclear Power Plant Units 3 and 4, Revision 3. The UTR reflects changes to maintain consistency between the Reference COLA and the Subsequent COLA. The UTR revision list provides a summary of and a reason for each change, and addresses any differences in page numbers between COLA Revision 3 and the UTR.

Should you have any questions regarding the UTR, 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 August 29, 2012.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Attachment: COL Application Part 10, ITAAC and Proposed License Conditions, Revision 3
Update Tracking Report, Revision 0

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MRD

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August 27, 2012

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application**

Part 10

**ITAAC and Proposed License Conditions
Revision 3**

Update Tracking Report

Revision 0

Revision History

Revision	Date	Update Description
-	6/28/2012	COLA Revision 3 Transmittal See Luminant Letter no. TXNB-12023 Date 6/28/2012
-	05/31/2012	Updated Section: Appendix A.1 See Luminant Letter no. TXNB-12016 Date 05/31/2012 Incorporated responses to following RAIs No. 251
-	06/21/2012	Updated Section: Appendix A.1 See Luminant Letter no. TXNB-12022 Date 06/21/2012 Incorporated responses to following RAIs No. 254
-	07/16/2012	Updated Section: Appendix A.1 See Luminant Letter no. TXNB-12025 Date 07/16/2012 Incorporated responses to following RAIs No. 56 Supplemental 01
-	07/24/2012	Updated Sections: 2.6, 3 See Luminant Letter no. TXNB-12027 Date 07/24/2012 Incorporated responses to following RAIs No. 261
0	08/27/2012	Updated Section: Appendix A.2

Tracking Report Revision List

Change ID No.	Section	ITAAC Rev.3 Page *	Reason for change	Change Summary	Rev. of T/R
RCOL2_09.02.01-10	Appendix A.1	9	Response to RAI No. 251 Luminant Letter no.TXNB-12016 Date 05/31/2012	Clarified that water hammer is prevented in the ESWS as well as the UHS, including testing of the as-built.	-
	Table A.1-1 (Sheet 6 of 7)	16			
RCOL2_14.03.07-38	Appendix A.1 A.1.1	11 [10]	Response to RAI No. 254 Luminant Letter no.TXNB-12022 Date 6/21/2012	Added ITAAC to address UHS fan qualification against tornado effects. Added ITAAC to address cooling tower spray nozzle size.	-
	Table A.1-1 (Sheet 7 of 7)	18 [17]			
RCOL2_14.03.03-1 S01	Appendix A.1 A.1.1	11	Supplemental Response to RAI No. 56 Luminant Letter no.TXNB-12025 Date 7/16/2012	An additional ITAAC (#21) was added to Table A.1-1 to verify the "design" of ASME Section III Piping and Components.	-
	Table A.1-1 (Sheet 7 of 7)	18			
RCOL2_01.05-3	2.6	3	Response to RAI No. 261 Luminant Letter no.TXNB-12027 Date 7/24/2012	Added description regarding a potential condition to the license. Added a proposed licensing condition.	-
	3	7			

Change ID No.	Section	ITAAC Rev.3 Page *	Reason for change	Change Summary	Rev. of T/R
CTS-01504	Appendix A.2 Table A.2-1 ITAAC 1.b	25	NRC reviewer comment from a view point of consistency with S-COLA	Added “, considering postulated dynamic effects (i.e., missile and pipe break hazard), internal flooding and fire” to the last sentence of the Acceptance Criteria.	0
CTS-01504	Appendix A.2 Table A.2-1 ITAAC 3.b	26	NRC reviewer comment from a view point of consistency with S-COLA	The last word in the Design Commitment, “cable”, changed to “cables”	0
CTS-01504	Appendix A.2 Table A.2-1 ITAAC 3.b	26	NRC reviewer comment from a view point of consistency with S-COLA	Wording in the Acceptance Criteria after “RG 1.75” changed to: “, between the as-built cables of redundant UHS ESW pump house ventilation systems Class 1E divisions”	0
CTS-01504	Appendix A.2 Table A.2-1 ITAAC 5.a	26	NRC reviewer comment from a view point of consistency with S-COLA	Deleted “exist” and “to” from the Acceptance Criteria.	0

Change ID No.	Section	ITAAC Rev.3 Page *	Reason for change	Change Summary	Rev. of T/R
CTS-01504	Appendix A.2 Table A.2-1 ITAAC 6	26 [27]	NRC reviewer comment from a view point of consistency with S-COLA	Deleted "of the parameters" from the Design Commitment.	0
CTS-01504	Appendix A.2 Figure A.2-1	31	NRC reviewer comment from a view point of consistency with S-COLA	Revised the figure to add a backdraft damper at each room inlet/outlet duct.	0

*Page numbers for the attached marked-up pages may differ from the revision 3 page numbers due to text additions and deletions. When the page numbers for the attached pages do differ, the page number for the attached page is shown in brackets.

**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 10 - ITAAC and Proposed License Conditions
Appendix A.2**

**Table A.2-1 (Sheet 1 of 3)
UHS ESW Pump House Ventilation System
Inspections, Tests, Analyses, and Acceptance Criteria**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
1.a The functional arrangement of the UHS ESW pump house ventilation system is as described in the Design Description of Section A.2.1 and as shown in Figure A.2-1	1.a Inspection of the as-built UHS ESW pump house ventilation system will be performed.	1.a The as-built the UHS ESW pump house ventilation system conforms to the functional arrangement as described in the Design Description of Section A.2.1 and as shown in Figure A.2-1.
1.b Each mechanical division of the UHS ESW pump house ventilation system (Division A, B, C & D) is physically separated from the other divisions so as not to preclude accomplishment of the safety function.	1.b Inspection and analysis of the as-built UHS ESW pump house ventilation system will be performed.	1.b A report exists and concludes that each mechanical division of the as-built UHS ESW pump house ventilation system is physically separated from other mechanical divisions by spatial separation, barriers, or enclosures so as to assure that the functions of the safety related systems are maintained, <u>considering postulated dynamic effects (i.e., missile and pipe break hazard), internal flooding and fire.</u>
2. The seismic Category I equipment, identified in Table A.2-2, can withstand seismic design basis loads without loss of safety function.	2.a Inspections will be performed to verify that the seismic Category I as-built equipment identified in Table A.2-2 is located in a seismic Category I structure.	2.a The seismic Category I as-built equipment identified in Table A.2-2 is located in a seismic Category I structure.
	2.b Type tests, analyses, or a combination of type tests and analyses of the seismic Category I equipment identified in Table A.2-2 will be performed using analytical assumptions, or will be performed under conditions, which bound the seismic design basis requirements.	2.b A report exists and concludes that the seismic Category I equipment identified in Table A.2-2 can withstand seismic design basis loads without loss of safety function.
	2.c Inspection and analyses will be performed to verify that the as-built seismic Category I equipment identified in Table A.2-2, including anchorages, is seismically bounded by the tested or analyzed conditions.	2.c A report exists and concludes that the as-built seismic Category I equipment identified in Table A.2-2, including anchorages, is seismically bounded by the tested or analyzed conditions.

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**Comanche Peak Nuclear Power Plant, Units 3 & 4
COL Application
Part 10 - ITAAC and Proposed License Conditions**

Appendix A.2

**Table A.2-1 (Sheet 2 of 3)
UHS ESW Pump House Ventilation System
Inspections, Tests, Analyses, and Acceptance Criteria**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
3.a Class 1E equipment identified in Table A.2-2 is powered from its respective Class 1E division.	3.a A test will be performed on each division of the as-built Class 1E equipment identified in Table A.2-2 by providing a simulated test signal only in the Class 1E division under test.	3.a The simulated test signal exists at the as-built Class 1E equipment identified in Table A.2 -2 under test.
3.b. Separation is provided between redundant divisions of UHS ESW pump house ventilation system Class 1E cables, and between Class 1E cables and non-Class 1E cables.	3.b Inspections of the as-built Class 1E divisional cables will be performed.	3.b Physical separation or electrical isolation is provided in accordance with RG 1.75, between <u>the as-built cables of redundant UHS ESW pump house ventilation systems Class 1E divisions</u> the redundant divisions of the as-built UHS ESW pump house ventilation system Class 1E cables and between Class 1E cables and non-Class 1E cables.
4. The UHS ESW pump house ventilation system provides heated air via unit heaters and cooled air via exhaust fansto maintain area temperature within design limits in the UHS ESW pump houses during all plant operating conditions including normal plant operations, abnormal and accident conditions of the plant.	4. Tests and analyses of the as-built UHS ESW pump house ventilation system will be performed for all four divisions.	4. A report exists and concludes that the as-built UHS ESW pump house ventilation system is capable of providing heated air via unit heaters and cooled air via exhaust fans to maintain area temperature within design limits in the UHS ESW pump houses during all plant operating conditions including normal plant operations, abnormal and accident conditions of the plant with outside ambient design temperature condition (i.e. -5°F - 115 °F).
5.a. Controls are provided in the MCR to start and stop the UHS ESW pump house ventilation system exhaust fans and unit heaters identified in Table A.2-3.	5.a. Tests will be performed on the as-built exhaust fans and unit heaters identified in Table A.2-3 using controls in the as-built MCR.	5.a Controls to exist in the as-built MCR to start and stop the as-built UHS ESW pump house ventilation system exhaust fans and unit heaters identified in Table A.2-3.
5.b. The UHS ESW pump house ventilation system exhaust fans and unit heaters identified in Table A.2-2 as having PSMS control, perform as active safety function after receiving a signal from PSMS.	5.b. Tests will be performed on the as-built UHS ESW pump house ventilation system exhaust fans and unit heaters identified in Table A.2-2 as having PSMS using simulated signals.	5.b. The as-built UHS ESW pump house ventilation system exhaust fans and unit heaters identified in Table A.2-2 as having PSMS control, perform an active safety function identified in the table after receiving a simulated signal.

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**Comanche Peak Nuclear Power Plant, Units 3 & 4
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Appendix A.2

**Table A.2-1 (Sheet 3 of 3)
UHS ESW Pump House Ventilation System
Inspections, Tests, Analyses, and Acceptance Criteria**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
5.c. The UHS ESW pump house ventilation system backdraft dampers identified in Table A.2-2 as having a safety function perform a safety function to change position as indicated in the table.	5.c. Tests of the as-built UHS ESW pump house ventilation system backdraft dampers identified in Table A.2-2 as having a safety function will be performed.	5.c. Each as-built UHS ESW pump house ventilation system backdraft damper identified in Table A.2-2 as having a safety function changes position as indicated in the table under design conditions.
6. Displays of the parameters identified in Table A.2-3 are provided in the MCR.	6. Inspections will be performed for retrievability of displays identified in Table A.2-3 in the as-built MCR.	6. Displays identified in Table A.2-3 can be retrieved in the as-built MCR.
7. Displays and controls identified in Table A.2-3 are provided in the RSC.	7.a Inspections will be performed for retrievability of the displays identified in Table A.2-3 in the as-built RSC.	7.a Displays identified in Table A.2-3 can be retrieved in the as-built RSC.
	7.b Tests of the as-built RSC control functions identified in Table A.2-3 will be performed.	7.b Controls in the as-built RSC operate the as-built equipment identified in Table A.2-3 with an RSC control function.

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**Comanche Peak Nuclear Power Plant, Units 3 & 4
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Appendix A.2

Figure A.2-1 UHS ESW Pump House Ventilation System

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