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10 CFR 2.202

October 25, 2012

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

**SUBJECT:** COMANCHE PEAK NUCLEAR POWER PLANT, DOCKET NOS. 50-445 AND 50-446,  
Initial Status Report in Response to March 12, 2012 Commission Order Modifying  
Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation  
(Order Number EA-12-051)

**REFERENCES:** 1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to  
Requirements for Reliable Spent Fuel Pool Instrumentation  
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051,  
Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool  
Instrumentation, Revision 0, dated August 29, 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an Order (Reference 1) to Luminant Generation Company, LLC. Reference 1 was immediately effective and directs Luminant Generation Company, LLC to have a reliable indication of the water level in associated spent fuel storage pools for Comanche Peak Nuclear Power Plant (CPNPP). Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Luminant Generation Company, LLC has received Reference 2 and is in the process of evaluating the guidance for the purpose of providing a reliable indication of the water level in associated spent fuel storage pools as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Resources are being identified. CPNPP is evaluating various spent fuel pool instrumentation technology and vendor options.
- A project manager has been assigned, and project planning initiated, including development of milestones, to assure compliance with Reference 1.

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Planned activities for the next six months:

- Select Spent Fuel Pool Instrumentation technology and award contract.
- Begin design modification process.
- Development and submittal of the overall integrated plan to the NRC by February 28, 2013, in compliance with Reference 1.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Spent Fuel Pools 1 and 2 (common) prior to startup from CPNPP Unit 1 Refueling Outage (RFO) 1RF17, Fall 2014.

This letter contains no new regulatory commitments. Should you have any questions concerning the content of this letter, please contact Dennis Buschbaum at 254-897-5851 or [dennis.buschbaum@luminant.com](mailto:dennis.buschbaum@luminant.com).

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

Executed on October 25, 2012.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:   
Fred W. Madden  
Director, Oversight & Regulatory Affairs

- c - E. J. Leeds, Director, Office of Nuclear Reactor Regulation  
E. E. Collins, Region IV  
B. K. Singal, NRR  
Resident Inspectors, Comanche Peak