



Rafael Flores
Senior Vice President
& Chief Nuclear Officer
rafael.flores@luminant.com

Luminant Power
P O Box 1002
6322 North FM 56
Glen Rose, TX 76043

T 254 897 5590
C 817 559 0403
F 254 897 6652

CP-201201239
Log # TXX-12158

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 Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

- REFERENCES:**
1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
 3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
 4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 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 develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. 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 establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1 for Comanche Peak Nuclear Power Plant (CPNPPP).

A member of the STARS Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

AISI
NRR

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.
- A site walkdown was conducted to evaluate preliminary plant modification options for compliance with the strategies identified in Reference 4.

Planned activities for the next six months:

- Analyses and conceptual designs for modifications to demonstrate compliance with strategies identified in Reference 4.
- Development and submittal of the overall integrated plan to the NRC by February 28, 2013, in compliance with Reference 1.
- Commencement of detailed design process to implement modifications required for compliance with strategies identified in Reference 4.

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 Comanche Peak Unit 1 prior to startup from Refueling Outage (RFO) 1RF17 (Fall 2014).
- Implementation of the order will be completed for Comanche Peak Unit 2 prior to startup from Refueling Outage (RFO) 2RF15 (Fall 2015).

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

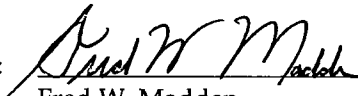
I state under penalty of perjury that the foregoing is true and correct.

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