



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 18, 2012

LICENSEE: Luminant Generation Company LLC

FACILITY: Comanche Peak Nuclear Power Plant, Units 1 and 2

SUBJECT: SUMMARY OF NOVEMBER 20, 2012, PRE-SUBMITTAL PUBLIC MEETING WITH LUMINANT GENERATION COMPANY LLC TO DISCUSS THE PROPOSED LICENSE AMENDMENT REQUEST FOR APPROVAL OF THE REVISED SPENT FUEL POOL CRITICALITY ANALYSIS FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 (TAC NOS. ME8896 AND ME8897)

On November 20, 2012, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), and representatives of Luminant Generation Company LLC (Luminant, the licensee), at NRC Headquarters, Rockville, Maryland. The meeting notice and agenda, dated November 5, 2012, is located in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML12299A410. The purpose of the meeting was to discuss the proposed license amendment request (LAR) by the licensee for revision of Technical Specification (TS) 3.7.17, "Spent Fuel Assembly Storage," TS 3.7.16, "Fuel Storage Pool Boron Concentration," and TS 4.3, "Fuel Storage," at Comanche Peak Nuclear Power Plant, Units 1 and 2.

A list of meeting attendees is provided in Enclosure 1 to this meeting summary.

Meeting Summary

The discussion covered the following key topics:

- To provide the NRC an overview of the upcoming spent fuel pool LAR, which will supplement TS 3.7.17 to address fuel discharged from post-uprate conditions and implement additional controls, which is intended to provide additional margin.
- A subsequent LAR that will satisfy the commitment to prepare and submit a LAR, as specified in Confirmatory Action Letter 4-12-004 dated October 22, 2012 (ADAMS Accession No. ML12296A937).

A copy of the meeting materials/handouts is located at ADAMS Accession No. ML12328A125.

Results of Discussions

1. The licensee provided the schedules for submitting the LARs related to spent fuel pool criticality as follows:
 - LAR to revise TS 3.7.17, TS 3.7.16, and TS 4.3 in January 2013.

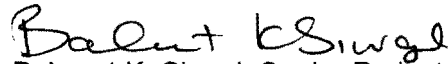
- LAR to revise the criticality analysis in March 2013.
2. Concerns and challenges raised by the NRC staff include:
- A proposed continuation of administrative controls is problematic when TS changes appear warranted.
 - A need for the analysis assumptions and justifications for design calculations to be clearly described in the LAR.
 - The impacts of power uprate on temperature profiles need to be considered. Interim Staff Guidance (DSS-ISG-2010-01, "Staff Guidance Regarding the Nuclear Criticality Safety Analysis of Spent Fuel Pools" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML110620086) referenced in Information Notice 2011-03, "Nonconservative Criticality Safety Analyses for Fuel Storage" (ADAMS Accession No. ML103090055) provides an approach acceptable to the NRC staff for developing the analysis of record.
 - Modifying the Final Safety Analysis Report (FSAR) may not be sufficient to provide the controls necessary to meet the regulations. Likewise, merely referencing the FSAR in the TSs may be a challenge for the NRC staff's review and approval.
 - The proposed LAR should identify the conservatisms in the analysis and the available margin. Non-conservatisms should be quantified.
 - The NRC staff expects the licensee's submittal to fully address the questions of no significant hazards consideration determination.
3. The NRC staff expressed concern that the proposed LAR submittal approach may be challenging because it appears to be very complicated, continues to rely heavily rely on administrative controls, and may not fully address all the issues in the ISG.

No Public Meeting Feedback Forms were received for this meeting.

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Please direct any inquiries to me at (301) 415-3016, or balwant.singal@nrc.gov.

Sincerely,


Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

NOVEMBER 20, 2012, MEETING WITH LUMINANT GENERATION COMPANY LLC
PRE-SUBMITTAL MEETING REGARDING PROPOSED LICENSE AMENDMENT REQUESTS
FOR APPROVAL OF REVISED SPENT FUEL POOL CRITICALITY ANALYSIS AND
ASSOCIATED TECHNICAL SPECIFICATION CHANGES
COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

NAME	TITLE	ORGANIZATION
Kent Wood	Team Leader	U.S. Nuclear Regulatory Commission (NRC)
Chris Jackson	Branch Chief	NRC
Gerry Waig*	Senior Reactor Systems Engineer	NRC
Jason Dykert*	Reactor Engineer	NRC (Region IV)
Wayne Walker*	Branch Chief	NRC (Region IV)
Emma Wong	Chemical Engineer	NRC
N. Kalyanam	Project Manager	NRC
Michael Markley	Branch Chief	NRC
Tim Hope	Manager, Nuclear Licensing	Luminant Generation Company LLC (Luminant)
Jimmy Seawright	Consulting Engineer, Regulatory Affairs	Luminant
Matthew Weeks	Core Performance, Engineering Manager	Luminant
Cody Lemons	Core Performance Engineer	Luminant
Kris Cummings	Manager, Fuel Engineering Licensing	Westinghouse ⁺
Blanco Andrew	Criticality Analyst	Westinghouse ⁺
Ben Mays	VP, Nuclear Engineering	Luminant

* Participated via phone

+ Represented Luminant

Enclosure

Please direct any inquiries to me at (301) 415-3016, or balwant.singal@nrc.gov.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
List of Attendees

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DPoulix, RIV

ADAMS Accession No. ML12332A365

*via email

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DATE	12/7/12	12/11/12	12/6/12	12/13/12
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DATE	12/10/12	12/11/12	12/18/12	12/18/12

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