



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

December 26, 2012

Mr. Rafael Flores  
Senior Vice President and  
Chief Nuclear Officer  
Attention: Regulatory Affairs  
Luminant Generation Company LLC  
P.O. Box 1002  
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 –  
WITHDRAWAL OF REQUESTED LICENSING ACTION RE: REVISION TO  
TECHNICAL SPECIFICATION 3.8.1, "AC SOURCES – OPERATING," FOR TWO  
14-DAY COMPLETION TIMES FOR OFFSITE CIRCUITS (TAC NOS. ME9724  
AND ME9725)

Dear Mr. Flores:

By letter dated October 2, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12285A086), Luminant Generation Company LLC (Luminant) submitted a license amendment for Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2. The proposed amendment would revise Technical Specification (TS) 3.8.1, "AC [Alternating Current] Sources – Operating," for two one-time extensions of the completion times for limiting condition for operation (LCO) 3.8.1 from 72 hours to 14 days for installation of a spare transformer. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the TSs) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

By letter dated December 13, 2012 (ADAMS Accession No. ML12359A018), you requested to withdraw the application from NRC review. The NRC acknowledges your request to withdraw the application. NRC staff activities on the review have ceased and the associated Technical Assignment Control numbers have been closed.

The NRC staff notes that its review to date has identified that your application relied on the fire probabilistic risk analysis (PRA) approaches of 1994 and earlier and did not reflect the current fire risk analysis methods. Based on applications using the latest fire PRA methods, fire risk is a significant contributor to plant total core damage frequency (CDF) and can have a significant

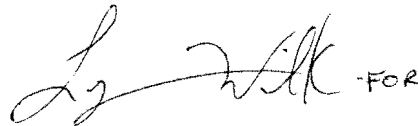
R. Flores

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impact on the electrical distribution system. Luminant did not demonstrate that fire risk is an insignificant contributor for this application. Thus, the NRC staff concluded that the analysis performed to support the license amendment request is inadequate. In particular, the fire risk model applied by CPNPP, Units 1 and 2, can potentially lead to incorrect quantification of those fire scenarios identified as important to the analysis, as well as omission of important fire scenarios. Luminant should provide an analysis consistent with current fire risk analysis methods, meeting the necessary quality for the application and peer review expectations as identified by NRC Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," March 2009, and the endorsed American Society of Mechanical Engineers/American Nuclear Society (ASME/ANS) PRA Standard, RA-Sa-2009. Therefore, if you decide to re-submit the request, it must address the NRC staff concerns related to the fire PRA.

If you have any questions, please call me at 301-415-3016 or via e-mail at [Balwant.Singal@nrc.gov](mailto:Balwant.Singal@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Balwant K. Singal" followed by "FOR" in smaller letters.

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

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If you have any questions, please call me at 301-415-3016 or via e-mail at [Balwant.Singal@nrc.gov](mailto:Balwant.Singal@nrc.gov).

Sincerely,

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

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**ADAMS Accession No. ML12355A758**

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