



**Luminant**

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Ref.# 10CFR50.54 (f)

February 28, 2013

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-001

**SUBJECT:** COMANCHE PEAK NUCLEAR POWER PLANT DOCKET NOS. 50-445  
AND 50-446 OVERALL INTEGRATED PLAN 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 dated March 12, 2012
  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. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August, 2012
  4. Luminant Generation Company LLC's 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), dated October 25, 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 (Luminant). Reference 1 was immediately effective and directs Luminant 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 Overall Integrated Plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) was issued August 29, 2012 which endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 3 provides direction regarding the content of this Overall Integrated Plan.

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A151  
NRR

Reference 4 provided Luminant's initial status report regarding mitigation strategies, as required by Reference 1.

The purpose of this letter is to provide the Overall Integrated Plan pursuant to Section IV, Condition C.1, of Reference 1. This letter confirms Luminant has received Reference 2 and has an Overall Integrated Plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from beyond-design-basis external events.

The information in the Attachment provides Luminant's Overall Integrated Plan for mitigation strategies pursuant to Reference 3. The enclosed Integrated Plan is based on conceptual design information. Final design details and associated procedure guidance, as well as any revisions to the information contained in the Attachment, will be provided in the 6-month Integrated Plan updates required by Reference 1.

This letter contains no new regulatory commitments.

If there are any questions regarding this plan, please contact Mr. 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 February 28, 2013.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

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

Attachment: General Integrated Plan Elements Comanche Peak Nuclear Power Plant

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