

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Monday, November 04, 2013 4:44 PM  
**To:** Woodlan, Don; John.Only@luminant.com  
**Cc:** Roy, Tarun; McBride, Mark; ComanchePeakCOL Resource  
**Subject:** Public Conference Call with Luminant November 13, 2013

For groundwater the staff would specifically like to see the following information:

- 1) An overview of the groundwater modeling approach, assumptions and results for determining onsite groundwater elevations.
  - a. How is the vertical leakage assumed conservative considering the current water elevations observed do not support this and are much higher than predicted.
  - b. The vertical leakage appears to be creating cones of depression that do not seem possible based on current observed groundwater levels.
  - c. The assumption of maximum water levels reaching 804' based on the elevation of ESW pipe chase seems arbitrary and not physically based. Please explain further.
- 2) An overview of the modeling approach, assumptions and results for the vertical and horizontal accidental release scenarios.
  - a. What were the assumptions used for distributing contaminants into a release volume that is used in RESRAD?
  - b. For horizontal release scenario why is nothing allowed to reach the SCR? Is that a conservative assumption for the exposure point?
  - c. For the vertical release is the assumption of 105 gallons out of 58,000 gallons migrating vertically conservative?
  - d. Are sorption assumptions used conservative?

With respect to Comanche Peak 3&4 COLA FSAR 2.4 surface water issues, the staff would like to focus on Section 2.4.2.3 and Figures 2.4.2-202 through 2.4.2-207 of the FSAR from COLA Rev 3. These are related to the design and analysis of the surface drainage design, which has evolved considerably from the last revision. Our expectation for the Nov 13 call is that the Applicant would be able to explain how the surface drainage design has changed and what changes to the modeling this prompted. In addition, the staff will also focus on three specific issues with the 2.4.2.3 analysis: (1) a conceptual understanding of flow paths across the site under local intense precipitation and the alignment of HEC-RAS model structure to that understanding, (2) the sensitivity (to assumptions and parameters) of the computed max water surface elevation of 820.98 relative the plant safety grade of 822 feet, and (3) the significance of water surface elevations exceeding 822 feet in the Unit 3 Southeast Channel.

Thanks,

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