



**Luminant**

**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-201400252  
Log # TXX-14026

REF 10 CFR 2.202

February 27, 2014

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,  
Second Six-Month Status Report in Response to March 12, 2012 Commission Order  
Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order  
Number EA-12-051) (TAC NOS. MF0862 AND MF0863)

- REFERENCES:**
1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.
  2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012.
  3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation", Revision 1, dated August 2012.
  4. Luminant Generation Company LLC's Letter TXX-12156, Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 25, 2012.
  5. Luminant Generation Company LLC's Letter TXX-13040, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013.

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 Power). Reference 1 was immediately effective and directs Luminant Power to have a reliable indication of the water level in associated spent fuel storage pools capable of supporting identification of specified levels in the pool water level conditions by trained personnel. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV,

A member of the STARS Alliance

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

A001  
NIRE

Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided Luminant Power's initial status report regarding Reliable Spent Fuel Pool Instrumentation, as required by Reference 1. Reference 5 provided Luminant Power's integrated plan. Reference 6 provided Luminant Power's response to a request for additional information (RAI) regarding the overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attachments to this letter provide an update of milestone accomplishments since the overall integrated plan was submitted (Reference 5), including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

If you have any questions regarding this report, please contact Carl B. Corbin at (254) 897-0121 or carl.corbin@luminant.com.

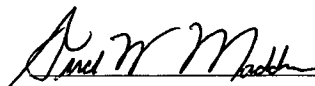
I state under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2014.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:   
Fred W. Madden  
Director, External Affairs

Attachment Comanche Peak Nuclear Power Plant (CPNPP), Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

c - Eric J. Leeds, Director, Office of Nuclear Reactor Regulation  
Marc L. Dapas, Region IV  
Jessica A. Kratchman, NRR/JLD/PMB  
Balwant K. Singal, NRR  
Resident Inspectors, Comanche Peak

**Comanche Peak Nuclear Power Plant (CPNPP), Second Six-Month Status Report  
in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to  
Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)**

**1 Introduction**

Comanche Peak Nuclear Power Plant developed an overall integrated plan (OIP) (Reference 1 [Refer to Section 10 of this attachment for a list of references.]), which includes a description of how compliance with the requirements described in Reference 2, Attachment 2 will be achieved. This attachment provides an update of milestone accomplishments since submittal of Reference 1, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

**2 Milestone Accomplishments**

Since the first six month update (Reference 5), no additional milestones have been completed. Final engineering and design is in progress.

**3 Milestone Schedule Status**

The following table provides an update to the milestone schedule. It provides the activity status of each item, and whether the expected completion date has changed. The dates are subject to change as design and implementation details are developed.

There were no changes to the original target completion dates.

Milestone	Original Target Completion Date	Activity Status	Target Completion Date Changes
Submit 60-day progress report	10/2012	Complete	
Submit overall integrated plan	2/2013	Complete	
Submit six-month updates			
Update 1	8/2013	Complete	
Update 2	2/2014	Complete	
Update 3	8/2014	Not started	
Update 4	2/2015	Not started	
Update 5	8/2015	Not started	
Update 6	2/2016	Not started	
Update 7	8/2016	Not started	
Request for Additional Information			
Submit RAI response to Reference 3	7/2013	Complete	
Submit RAI response to Reference 6	5/2014*	Started	
Commence Engineering and Design	1Q2013	Complete	
Complete Design	2Q2014	Started	
Receipt of SFP instruments	2Q2014	Not Started	
Complete SFP Instrumentation Procedures and Training	3Q2014	Not Started	
SFP Instruments Operational	4Q2014	Not Started	

\* The response to Reference 6 is discussed in Sections 7 and 8

#### **4 Changes to Compliance Method**

None

#### **5 Need for Relief and Basis for the Relief**

Luminant expects to comply with the implementation date in the Order. No relief is being requested at this time.

#### **6 Open Items from Overall Integrated Plan**

None

#### **7 Changes to Overall Integrated Plan**

On July 3, 2013, Luminant Power responded (Reference 4) to an initial NRC Request for Additional Information (Reference 3) dated June 7, 2013. Selected RAI responses were updated in the First Six Month Update (Reference 5). In Reference 6 the NRC transmitted RAIs which subsumed the previously transmitted RAIs (Reference 3). Reference 7 corrected a date in Reference 6.

As a result of communications on February 25, 2014, between Luminant Power (Carl Corbin, et.al.) and the NRC Staff (Balwant Singal, et.al.) of the NRC Staff, the NRC agreed that it is acceptable to provide a written response to all RAIs in Reference 6 by May 30, 2014. In the interim, Luminant Power agreed to provide information for the RAIs from Reference 6 to the NRC using the ePortal virtual audit process. This process will be similar to the ePortal virtual audit process currently being used for NRC Order EA-12-049 for mitigating strategies (ML13234A503).

#### **8 Open Items from the Request for Additional Information**

In Reference 6 the NRC transmitted RAIs which subsumed the previously transmitted RAIs (Reference 3).

Luminant Power will provide a written response to all RAIs in Reference 6 by May 30, 2014. In the interim, Luminant Power will provide information for the RAIs from Reference 6 to the NRC using the ePortal virtual audit process. This process will be similar to the ePortal virtual audit process currently being used for NRC Order EA-12-049 for mitigating strategies (ML13234A503). See Section 7 above for additional information.

#### **9 Potential Safety Evaluation Report Impacts**

There are no potential impacts to the Safety Evaluation Report identified at this time.

## 10 References

The following references support the updates to the OIP described in this document.

1. Luminant Generation Company LLC's Letter TXX-13040, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013
2. NRC Order Number EA-12-051, Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012
3. NRC Letter to Luminant Generation Company LLC, Comanche Peak Nuclear Power Plant, Units 1 and 2 -Request For Additional Information Re: Overall Integrated Plan In Response To Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0862 And MF0863), dated June 7, 2013
4. Luminant Generation Company LLC's Letter TXX-13103, Response to Request for Additional Information Regarding Overall Integrated Plan in Response to March 12, 2012, Commission Order to Modify License with Regard to Reliable Spent Fuel Pool Implementation (Order Number EA-12-051), dated July 3, 2013
5. Luminant Generation Company LLC's Letter TXX-13130, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (TAC NOS. MF0862 AND MF0863), dated August 28, 2013
6. NRC Letter to Luminant Generation Company LLC, Comanche Peak Nuclear Power Plant, Units 1 and 2 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC NOS. MF0862 and MF0863) dated November 4, 2013
7. NRC Letter to Luminant Generation Company LLC, Comanche Peak Nuclear Power Plant, Units 1 and 2 - Correction to Date related to Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC NOS. MF0862 and MF0863) dated November 19, 2013
8. Luminant Generation Company LLC's Letter TXX-13170, Comanche Peak Nuclear Power Plant, Docket Nos. 50-445 AND 50-446, Response to NRC Interim Staff Evaluation and Request for Additional Information Regarding the Overall Implementation Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC NOS. MF0862 AND MF0863), dated November 19, 2013