



Luminant

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December 10, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)
DOCKET NOS. 50-445 AND 50-446
COMMITMENT TO MAINTAIN SEVERE ACCIDENT MANAGEMENT GUIDELINES

Dear Sir or Madam:

The Nuclear Energy Institute (NEI) Nuclear Strategic Issues Advisory Committee (NSIAC) recently approved an Industry Initiative to implement and maintain Severe Accident Management Guidelines (SAMGs). This letter establishes commitments related to SAMGs for Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2. These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in Emergency Operating Procedures (EOPs). SAMG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases.

The new SAMG commitments are listed in Attachment 1.

It is expected that NRC staff personnel will conduct periodic inspection of our SAMGs and performance deficiencies, if any, will be assessed using the Reactor Oversight Process. We also understand that inspection activities will not extend to NRC review and approval of SAMG strategies, or the use of equipment described in the SAMGs.

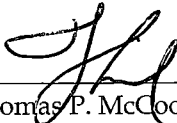
Should you have any questions concerning the content of this letter, please contact Robert A. Slough at 254-897-5727.

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NRR

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: 
Thomas P. McCool
Vice President, Engineering & Support

Attachment - List of Regulatory Commitments

c - Marc L. Dapas, U.S. Nuclear Regulatory Commission Regional Administrator, Region IV
William Dean, Director, Office of Nuclear Reactor Regulation
Balwant K. Singal, NRR
Resident Inspectors, Comanche Peak

NEI (David Young at dly@nei.org)

List of Regulatory Commitments

The following table identifies those actions committed to in this document by Luminant Generation Company LLC (Luminant Power) for Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2. Any other statements in this submittal are provided for informational purposes and are not considered to be regulatory commitments.

NUMBER	COMMITMENT	TYPE	COMPLETION DATE
5194898	CPNPP will consider the site SAMGs within plant configuration management processes in order to ensure that the SAMGs reflect changes to the facility over time.	Ongoing	October 31, 2016
5194911	CPNPP will update the site SAMGs to future revisions of the PWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents.	Ongoing	Within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater