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CP-201600177
TXX-16036

Ref. # 10CFR50.90

March 3, 2016

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKETS NOS. 50-445 AND 50-446
SUPPLEMENT TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST 15-003 FOR REVISION TO UNIT 1 AND UNIT 2 EMERGENCY ACTION LEVELS (CAC NOS. MF6407 AND MF6408)

REFERENCES:
1. Letter logged TXX-15101 dated June 30, 2015 from Rafael Flores to the NRC submitting License Amendment Request 15-003 for Revision to Unit 1 and Unit 2 Emergency Action Levels

2. NRC Letter dated December 16, 2015 from Balwant Singal of the NRC to Rafael Flores of Luminant Power requesting additional information regarding License Amendment Request 15-003 for Revision to Emergency Action Levels (CAC NOS. MF6407 and MF6408)

3. Letter logged TXX-16010 dated January 27, 2016 from Kenneth J. Peters to the NRC submitting the response to request for additional information regarding License Amendment Request 15-003 for Revision to Emergency Action Levels (CAC NOS. MF6407 and MF6408)

4. NRC email dated February 10, 2016 from Balwant Singal of the NRC to Timothy Hope of Luminant Hope regarding the Emergency Action Level (EAL) scheme change-request for additional information response.

Dear Sir or Madam:

Per Reference 1, Luminant Generation Company, LLC (Luminant Power) submitted License Amendment Request (LAR) 15-003 for revision to Unit 1 and Unit 2 Emergency Action Levels (EALs). Per Reference 2, the NRC provided a request for additional information regarding the subject LAR. Reference 3 provided the Luminant Power response to the request for additional information. Per Reference 4, two comments were received based on the NRC review of Reference 3.

Enclosed are the updated pages 32 and 166 of the CPNPP EAL Technical Bases Document to address the NRC comments.

The proposed license amendment will be implemented within 270 days of issuance of the license amendment. This is to allow training to be completed on the new EALs prior to implementation of the license amendment in January of 2017.

A001
NRR

This communication contains no new licensing basis commitments regarding Comanche Peak Units 1 and 2.

Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725.

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

Executed on March 3, 2016.

Sincerely,

Luminant Generation Company LLC

Kenneth J. Peters

By: _____
Thomas P. McCool
Site Vice President (Acting)

Enclosure – Updated Pages for the CPNPP EAL Technical Bases Document

c - Marc L. Dapas, Region IV (w/o enclosure)
Balwant K. Singal, NRR (w/o enclosure)
Resident Inspectors, Comanche Peak (w/o enclosure)
Robert Free, TDLR (w/o enclosure)

ENCLOSURE TO TXX-16036

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ATTACHMENT 1
EAL Bases

Category: R – Abnormal Rad Levels / Rad Effluent

Subcategory: 1 – Radiological Effluent

Initiating Condition: Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE

EAL:

RA1.1 Alert

Reading on **any** Table R-1 effluent radiation monitor greater than column "ALERT" for greater than or equal to 15 min. (Notes 1, 2, 3, 4)

Note 1: The Emergency Coordinator should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.

Note 2: If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded the specified time limit.

Note 3: If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer VALID for classification purposes.

Note 4 The pre-calculated effluent monitor values presented in EALs RA1.1, RS1.1 and RG1.1 should be used for emergency classification assessments until the results from a dose assessment using actual meteorology are available.

Table R-1 Effluent Monitor Classification Thresholds

	Release Point	Monitor	GE	SAE	Alert	UE
	Plant Vent (WRGM) PVF684 + PVF685	X-RE-5570 A + B	3.0E+7 µCi/sec	3.0E+6 µCi/sec	3.0E+5 µCi/sec	4.0E+4 µCi/sec
	Main Steam MSLu78 MSLu79 MSLu80 MSLu81	u-RE-2325 u-RE-2326 u-RE-2327 u-RE-2328	97 µCi/ml*	9.7 µCi/ml*	0.97 µCi/ml*	2 x high alarm setpoint*
Liquid	**Liquid Waste** LWE-076	X-RE-5253	----	----	----	2 x high alarm setpoint
Liquid	**Service Water** SSWu65 SSWu66	u-RE-4269 u-RE-4270	----	----	----	2 x high alarm setpoint

* with reactor shutdown

Mode Applicability:

All

Category: S –System Malfunction

Subcategory: 1 – Loss of Emergency AC Power

Initiating Condition: Prolonged loss of **all** offsite and **all** onsite AC power to safeguard buses

EAL:

SG1.1 General Emergency

Loss of **all** offsite and **all** onsite AC power capability to 6.9 KV safeguard buses uEA1 and uEA2

AND EITHER:

- Restoration of at least one safeguard bus in less than 4 hours is **not** likely (Note 1)
- CSFST Core Cooling RED Path conditions met

Note 1: The Emergency Coordinator should declare the event promptly upon determining that time limit has been exceeded, or will likely be exceeded.

Mode Applicability:

1 - Power Operation, 2 - Startup, 3 - Hot Standby, 4 - Hot Shutdown

Definition(s):

None

Basis:

This EAL is indicated by the extended loss of all offsite and onsite AC power capability to 6.9 KV safeguard buses uEA1 and uEA2 either for greater then the CPNPP Station Blackout (SBO) coping analysis time (4 hrs.) (ref. 7) or that has resulted in indications of an actual loss of adequate core cooling.

Indication of continuing core cooling degradation is manifested by CSFST Core Cooling RED Path conditions being met. (ref. 8).

For emergency classification purposes, "capability" means that an AC power source is available to the emergency buses, whether or not the buses are powered from it.

The safeguards AC distribution system power sources consist of the preferred and alternate offsite power sources, and the onsite standby emergency diesel generators uEG1 and uEG2.