



Luminant

Thomas P. McCool
Site Vice President
Thomas.McCool@Luminant.com

Luminant Power
P O Box 1002
6322 North FM 56
Glen Rose, TX 76043

T 254 897 6042
C 817 776 0308
F 254 897 6652

CP-201600934
TXX-16106

Ref: 10 CFR 50.80
10 CFR 50.90
10 CFR 72.50

September 29, 2016

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Director, Office of Nuclear Reactor Regulation
Washington, DC 20555-0001

SUBJECT: Comanche Peak Nuclear Power Plant (CPNPP) and Independent Spent Fuel Storage Installation (ISFSI), Docket Nos. 50-445, 50-446, 72-74
Information Regarding NRC Order Approving Transfer of Licenses and Conforming License Amendments (CPNPP Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89)) (CAC NOS. MF7075 and MF7076)

REFERENCES:

1. Luminant Power Letter logged TXX-15146 from Rafael Flores to the NRC dated November 12, 2015, Application for Order Approving Transfer of Licenses and Conforming License Amendments (CPNPP Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89)) (ML15320A093)
2. Comanche Peak Nuclear Power Plant, Unit Nos. 1 And 2 And Independent Spent Fuel Storage Installation - Order Approving Transfer of Licenses And Conforming Amendments (CAC NOS. MF7075 AND MF7076), dated May 6, 2016 (ML16096A255)

Dear Sir or Madam:

Luminant Generation Company LLC ("Luminant Power") hereby submits additional information in connection with the transfer of licenses requested in Reference 1 and approved by Reference 2.

The last regulatory approval for the proposed transfer action was obtained on September 27, 2016. The NRC's Order (Reference 2) requires that after receipt of all required regulatory approvals of the proposed transfer action, Luminant Power shall inform the Director of the Office of Nuclear Reactor Regulation in writing of such receipt within 5 business days, this letter satisfies that requirement.

Enclosure 1 provides documentary evidence to the Director of the Office of Nuclear Reactor Regulation that, as of the date of the license transfer, the licensees reflected in the amended licenses will have the appropriate amount of insurance required of a licensee under 10 CFR Part 140 and 10 CFR 50.54(w). Enclosure 2 of this letter provides an updated status of regulatory commitment 5178508 to reflect the additional information provided by this letter.

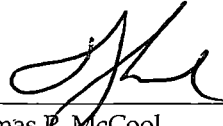
M001
NM5526
NRR
NM53

Attachment 1 provides the affidavit for Thomas P. McCool regarding the information provided by this letter.

If the NRC requires additional information concerning the enclosed application, please contact Thomas P. McCool, Site Vice President, Luminant Power, tel: (254) 897-6042 or e-mail (Thomas.McCool@Luminant.com).

Sincerely,

Luminant Generation Company LLC



Thomas P. McCool
Site Vice President

Attachment 1 Affirmation of Thomas P. McCool
Enclosure 1 Documentary Evidence of Insurance
Enclosure 2 Updated Regulatory Commitment

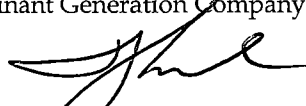
William M. Dean, Director, Office of Nuclear Reactor Regulation
Kris Kennedy, Region IV
Margaret M. Watford, NRR
Resident Inspectors, Comanche Peak

Mr. Robert Free
Environmental Monitoring & Emergency Response Manager
Texas Department of State Health Services
Mail Code 1986
P. O. Box 149347
Austin TX, 78714-9347

Affirmation

I, Thomas P. McCool, being duly sworn, state that I am the Site Vice President for Comanche Peak Nuclear Power Plant, Luminant Generation Company LLC ("Luminant Power"), that I am authorized to sign and file this additional information in support of its "Application for Order Approving Transfer of Licenses and Conforming License Amendments," with the Nuclear Regulatory Commission on behalf of Luminant Power and its affiliates, and that the statements made and the matters set forth herein pertaining to Luminant Power and its affiliates are true and correct to the best of my knowledge, information, and belief.

Luminant Generation Company LLC



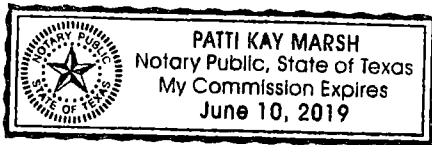
Thomas P. McCool
Site Vice President

STATE OF TEXAS

COUNTY OF Somervell

Subscribed and sworn to before me, a Notary Public, in and for the County and State

above named, this 29th day of Sept. 2016.



Patti Kay Marsh

My Commission Expires: 6/10/19

**Enclosure 1 to TXX-16106
(5 total pages including this page)**

Documentary Evidence of Insurance



Nuclear Electric Insurance Limited
Suite 1100
1201 Market Street
Wilmington, DE 19801
U.S.A.

Michael W. Kolodner, CPCU
Vice President – Member Insurance

302 573-2263 Direct
302 888-3000 Tel
302 888-3008 Fax
302-588-5654 Cell
mkolodner@nmlneil.com

September, 27 2016

Eric Olvera
Indemnity Specialist
U.S. Nuclear Regulatory Commission
Mail Stop 12D3
1 White Flint North
Rockville, MD 20852

Re: Comanche Peak Power Company LLC

Dear Mr. Olvera:

This letter confirms that Nuclear Electric Insurance Limited will write nuclear property insurance for Comanche Peak Power Company LLC as the owner of 100% of the Comanche Peak Steam Electric Station. The insurance will be effective on the date of the transfer of the licensed plant from Energy Future Holdings Corp. to Comanche Peak Power Company LLC.

Effective on the closing date of the asset transfer, the following Primary Property and Decontamination Liabilities, and NEIL I Accidental Outage Insurance Policies, and Decontamination Liability, Decommissioning Liability and Excess Property Insurance Policies, for Comanche Peak Steam Electric Station will be amended to delete Energy Future Holdings Corp. as an Insured:

Comanche Peak - P16-061, E16-062, and X16-062

The combined limits on the above policies will satisfy the NRC required minimum property insurance limit of \$1.06 billion in accordance with 1 CFR 50.54(w).

This commitment to write nuclear property insurance to Comanche Peak Power Company LLC remains valid through March 31, 2017. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely.

A handwritten signature in black ink, appearing to read 'M. Kolodner', with a long horizontal flourish extending to the right.

Michael W. Kolodner, CPCU, ARM, ARe
Vice President – Member Insurance

Cc: Robert Moussaid Mark Webster Tim Farward Jon Levis



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
09/27/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Marsh USA Inc. 500 Dallas Street, Suite 1500 Houston, TX 77002 897592-CPPC-Nucle-16-17	CONTACT NAME: PHONE (A/C, No, Ext): _____ FAX (A/C, No): _____ E-MAIL ADDRESS: _____ INSURER(S) AFFORDING COVERAGE _____ NAIC # _____ INSURER A : American Nuclear Insurers INSURER B : _____ INSURER C : _____ INSURER D : _____ INSURER E : _____ INSURER F : _____
INSURED Comanche Peak Power Company LLC 1601 Bryan Street Dallas, TX 75201	

COVERAGES **CERTIFICATE NUMBER:** HOU-002836142-04 **REVISION NUMBER:** 2

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER: _____						EACH OCCURRENCE \$ DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$ _____ \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ _____ \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED _____ RETENTION \$ _____						EACH OCCURRENCE \$ AGGREGATE \$ _____ \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A If yes, describe under DESCRIPTION OF OPERATIONS below						<input type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
A	Nuclear Energy Liability Insurance			See Attached Acord 101	01/01/2016	01/01/2017	See Attached Acord 101

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
 Effective on the closing date of asset transfer, the insurance policy and certificates for Comanche Peak Nuclear Power Plant will be amended to delete Luminant Generation Company LLC as a Named Insured.

CERTIFICATE HOLDER Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555-0001	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE of Marsh USA Inc. Jessie Guerrero
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ADDITIONAL REMARKS SCHEDULE

AGENCY Marsh USA Inc.		NAMED INSURED Comanche Peak Power Company LLC 1601 Bryan Street Dallas, TX 75201	
POLICY NUMBER		EFFECTIVE DATE:	
CARRIER	NAIC CODE		

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

CERTIFICATE OF NUCLEAR ENERGY LIABILITY INSURANCE

This is to certify that there is in force as of the effective date of this Certificate a Nuclear Energy Liability Insurance Policy issued by members of American Nuclear Insurers as indicated (Companies), to the Insured named herein, with respect to the Nuclear Facility at the Location shown and/or with respect to the Insured's operations described herein. If such policy is cancelled or otherwise terminated prior to the end of December 31st of the calendar year in which the Effective Date of this Certificate occurs, notice will be delivered in accordance with the policy provisions. Otherwise this Certificate shall terminate as of the end of such December 31st. A Certificate will NOT be issued for any subsequent calendar year unless requested in writing.

Types of Insurance: NF - [Facility Form], NW- [Master Worker Certificate], NS - [US Domestic Supplier's & Transporters], FS - [Foreign Suppliers & Transporters], N- [Secondary Financial Protection Certificate]

COVERAGE FOR NUCLEAR FACILITIES:

1. SITE #1 - COMANCHE PEAK

LOCATION OF NUCLEAR FACILITY: Comanche Peak Nuclear Power Plant is located on the south bank of Squaw Creek Reservoir near the town of Glen Rose in Somervell County, Texas approximately 35 miles southwest of Fort Worth and 67 miles southwest of Dallas, Texas.

NAMED INSURED [LISTED ON POLICY]: Comanche Peak Power Company LLC

POLICY NUMBER:	POLICY EFFECTIVE:	LIMIT OF LIABILITY:
NF-0274	01/01/1983	\$375 Million
NW-0631	01/01/1983	\$375 Million**
N-0090	02/08/1990	***
N-0119	02/02/1993	***

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.

The insurance afforded by the policy(ies) is subject to the exclusions, conditions and other provisions of the policy(ies). Neither this Certificate nor any contract or other document with respect to which it is issued shall amend, extend or alter the coverage afforded by the policy. The Limit of Liability shown above may have been reduced by payment of claims or claims expenses.

COMMENTS/NOTES:

- ** Master Worker Certificate - This limit is shared by all Certificates to the Master Worker Policy of which each Certificate is a part and is subject to all of the provisions of such Policy and Certificate having reference thereto. Such limit may have been reduced by payment of claims or claims expenses.
- *** Secondary Financial Protection Certificate - Financial protection available under an industry retrospective rating plan.

Updated Regulatory Commitment (Number 5178508)

- (1) Luminant Power will notify the NRC if at any time prior to the NRC consent to the requested transfer, the following item changes: Any entity of the Reorganized TCEH acquires greater than 15% of the First Lien Claims;
 - a. Schedule Completion Date: Upon NRC consent of the requested transfer
 - b. Status / Comments: Closed / The ownership percentages of the First Lien Creditors identified in the table at page 17 of TXX-15146 were updated by Enclosure 2 to TXX-16028. All entities remain below 15%.
- (2) Luminant Power will notify the NRC if at any time prior to the NRC consent to the requested transfer, the following item changes: Any member of the First Lien Creditor Committee, other than those already identified in the Application, is expected to own 10% of the voting power of Reorganized TCEH.
 - a. Schedule Completion Date: Upon NRC consent of the requested transfer
 - b. Status / Comments: Closed.
- (3) Luminant Power will also provide to the NRC: The names of the principal officers and directors of each of the subsidiary companies of the Reorganized TCEH, after they have been identified;
 - a. Schedule Completion Date: As soon as they have been identified but no later than 7 days prior to consummation of the transfer
 - b. Status / Comments: Closed / Information provided by Enclosure 2 of TXX-16105
- (4) Luminant Power will also provide to the NRC: The names and citizenship of the initial members of the Reorganized TCEH Board, when that information becomes available. All or substantially all of the Reorganized TCEH Board members will be U.S. citizens. Three of the initial seven members have been identified (2 U.S. citizens and 1 Canadian citizen) and the remaining four members will be U.S. citizens;
 - a. Schedule Completion Date: As soon as available but no later than 7 days prior to consummation of the transfer
 - b. Status / Comments: Closed / TXX-15146 identified three board member, Geoffrey Strong (U.S. citizen), Cyrus Madon (Canadian citizen), and Jennifer Box (U.S. citizen). TXX-16098 identified four board members, Curt Morgan (U.S. citizen / new CEO), Jeff Hunter (U.S. citizen), Gavin Baiera (U.S. citizen), and Michael Liebelson (U.S. citizen) . [Response to NRC RAI , statement in NRC Order Safety Evaluation, and NRC Order condition (1)]
- (5) Luminant Power will also provide to the NRC: The final legal entity names, and updated proposed operating license revision pages, when final names for Reorganized TCEH, Intermediate Holding Company LLC, Operating Company LLC, Asset Company LLC, Preferred Stock Company Corp., and Comanche Peak LLC are selected;
 - a. Schedule Completion Date: No later than 7 days prior to consummation of the transfer
 - b. Status / Comments: Closed / Information provided by Enclosures 1, 3, and 4 of TXX-16105
- (6) Luminant Power will also provide to the NRC: The name of the new CNO, when a successor to current CNO Rafael Flores is selected; and
 - a. Schedule Completion Date: No later than 7 days prior to consummation of the transfer
 - b. Status / Comments: Closed / Update provided by TXX-15166 (Ken Peters is acting CNO) and closed by TXX-16057 (Ken Peters is new CNO)
- (7) Luminant Power will also provide to the NRC: Notification that the Bankruptcy Court has confirmed the "Fifth Amended Joint Plan of Reorganization of Energy Future Holdings Corp., et al., Pursuant to Chapter 11 of the Bankruptcy Code," upon receipt of a final order of the Bankruptcy Court.
 - a. Schedule Completion Date: Upon consent of the requested transfer
 - b. Status / Comments: Closed / Completed by submittal of Enclosures 1 and 2 of letter TXX-15166.

- (8) At the first meeting of the Reorganized TCEH Board of Directors emergence, the Board will adopt resolutions that non-U.S. citizens or foreign appointed U.S. citizens serving as either directors or executive officers of Reorganized TCEH, the ultimate parent, and intermediate parents of CP LLC and OpCo LLC shall not seek access to any classified information or to special nuclear material in the custody of the Comanche Peak licensees and shall not participate in or seek to influence operational decisions by the licensees regarding nuclear safety or security matters. Also, at the first meeting a Nuclear Oversight and Advisory Board will be formed to assist in the oversight of the safety and quality of nuclear operations.
 - a. Schedule Completion Date: First meeting of Reorganized TCEH Board of Directors
 - b. Status / Comments: Open / [Updated to reflect 1st sentence of NRC Order condition (3)]
- (9) The applicants will notify the NRC of any changes to the directors, officers, or executive positions of Reorganized TCEH and its subsidiaries during the first 90 days following the transfers
 - a. Schedule Completion Date: No later than 120 days after the transfers
 - b. Status / Comments: Open / [NRC Order condition (1)]
- (10) A letter will be issued to the NRC by the new licensee within 30 days that "adopts and endorses" all outstanding items on the docket, including, but not limited to requests for license amendments, exemptions, relief requests, etc. The letter will be submitted under oath or affirmation.
 - a. Schedule Completion Date: No later than 30 days after the transfers
 - b. Status / Comments: Open
- (11) Provide satisfactory documentary evidence to the Director of the Office of Nuclear Reactor Regulation that the licensees reflected in the amended licenses have obtained the appropriate amount of insurance required of a licensee under 10 CFR Part 140 and 10 CFR 50.54(w)
 - a. Schedule Completion Date: On the license transfer date
 - b. Status / Comments: Closed / Documentary Evidence of Insurance provided by TXX-16106 dated September 29, 2016 [Added to reflect NRC Order condition (4)]
- (12) After receipt of all required regulatory approvals of the proposed transfer action, inform the Director of Nuclear Reactor Regulation in writing of such receipt.
 - a. Schedule Completion Date: Within 5 business days of after all regulatory approvals
 - b. Status / Comments: Closed / Notification to Director of Nuclear Reactor Regulation provided by TXX-16106 dated September 29, 2016 [Added to reflect NRC Order requirement]
- (13) Notify the Director of the Office of Nuclear Reactor Regulation in writing of the date of the closing of the direct transfer.
 - a. Schedule Completion Date: 7 business days before the date of closing
 - b. Status / Comments: Closed, but subject to update / Targeted date of October 3, 2016 provided by TXX-16109 dated September 16, 2016 [Added to reflect NRC Order requirement]