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Ref. # 10 CFR 52

December 16, 2013

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555
ATTN: David B. Matthews, Director
Division of New Reactor Licensing

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 3 AND 4
DOCKET NUMBERS 52-034 AND 52-035
SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION 169 (4846) (SECTION 10.2.3)

Dear Sir:

Luminant Generation Company LLC (Luminant) submits herein supplemental information for the response to Request for Additional Information 169 (4846) for the Combined License Application for Comanche Peak Nuclear Power Plant Units 3 and 4. The supplemental information addresses the turbine inspection program.

Should you have any questions regarding the attached supplemental information, please contact Don Woodlan (254-897-6887, Donald.Woodlan@luminant.com) or me.

There are no commitments in this letter.

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

Executed on December 16, 2013.

Sincerely,

Luminant Generation Company LLC

Donald R. Woodlan for

Rafael Flores

Attachment: Supplemental Response to Request for Additional Information 169 (4846)

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SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Comanche Peak, Units 3 and 4

Luminant Generation Company LLC

Docket Nos. 52-034 and 52-035

RAI NO.: 169 (4846)

SRP SECTION: 10.02.03 - Turbine Rotor Integrity

QUESTIONS for Component Integrity, Performance, and Testing Branch 1 (AP1000/EPR Projects) (CIB1)

DATE OF RAI ISSUE: 7/8/2010

QUESTION NO.: 10.02.03-02

Revision 1 of the Comanche Peak COL FSAR revised Section 10.2.3.5 to state that a turbine maintenance and inservice inspection procedure will be established prior to fuel load. However, the description of the inspection program, including the inspection intervals were not provided in this revised COL FSAR Section 10.2.3.5, as requested in the NRC staff's RAI Number 6 (2614). Therefore, Luminant is requested to provide the following information in order to meet the requirements of General Design Criterion 4 of 10 CFR Part 50:

a) The guidelines in Section C.I.10.2.3.5 of Part I to Regulatory Guide (RG) 1.206 specify that if the plant-specific inspection program is not available at the time of the COL application, the representative information (description of the inspection program and inspection interval) may be submitted for staff review as part of the COL application. Therefore, describe the inservice inspection program and inspection intervals in the COL FSAR, or specify in the COL FSAR that the inspection procedure will be consistent with the inspection program and inspection intervals identified in Section 10.2.3.5 of the US-APWR DCD FSAR.

b) The submittal and implementation of the inservice inspection procedure should be included as a proposed license condition in Section 3 to Part 10 of the Comanche Peak COL application since this item will not be resolved prior to the issuance of the license. The proposal of a license condition, as discussed in Section C.I.10.2.3.5 of Part I to RG 1.206, ensures that the as-built plant is consistent with the design reviewed during the licensing process.

SUPPLEMENTAL INFORMATION S01:

This supplemental information is provided for the original response submitted on August 9, 2010 (ML102230154). The original response added a Turbine Inspection Program as a license condition in Subsection 3 of Part 10 of the COLA. In a later COLA revision, the individual license conditions for operational programs were combined into a single license condition that included the programs specifically designated in FSAR Table 13.4-201. The original response is not changed, but the Turbine

Inspection Program has been added to Table 13.4-201 as an operational program with a license condition as the implementing requirement.

Impact on R-COLA

See attached marked-up FSAR Revision 4 page 13.4-12.

Impact on DCD

None.

CP COL 13.4(1)

Table 13.4-201 (Sheet 11 of 11)

Operational Programs Required by NRC Regulation and Program Implementation

Item	Program Title	Program Source (Required By)	FSAR (SRP) Section	Implementation	
				Milestone	Requirement
22.	Special Nuclear Material Control and Accounting Program	10 CFR 74 Subpart B (§§ 74.11 - 74.19, excluding 74.17)	13.5.2.2	Prior to receipt of special nuclear material	License Condition
23	Turbine Inspection Program	10CFR50 Appendix A (GDC-4)	3.5.1.3.2 10.2.3.5	Prior to initial fuel load	License condition

RCOL2_10.02.03-2 S01

(1) Inservice Testing Program will be fully implemented by generator on line on nuclear heat. Appropriate portions of the program are implemented as necessary to support the system operability requirements of the Technical Specifications.