

September 9, 2008

Mr. M. R. Blevins  
Executive Vice President  
& Chief Nuclear Officer  
Luminant Generation Company LLC  
ATTN: Regulatory Affairs  
P. O. Box 1002  
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 –  
PROPOSED ALTERNATIVE COURSE OF ACTION RE: GENERIC LETTER  
2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE  
COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY  
SYSTEMS,” (TAC NOS. MD7813 AND MD7814)

Dear Mr. Blevins:

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the “subject systems”) are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the “9-month submittal”) of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the “3-month submittal”) of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

By letter dated April 10, 2008, Luminant Generation Company, LLC, (the licensee) submitted a 3-month response to GL 2008-01 for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The NRC staff’s assessment of the responses for CPSES, Units 1 and 2, is contained in the enclosure to this letter.

The NRC staff reviewed the licensee’s proposed alternative course of action and the associated basis for acceptance and concluded that for CPSES, Units 1 and 2, with the exception of the clarifications and associated requests discussed in the enclosure, they are acceptable. This letter allows the licensee to implement its proposed alternative course of action provided that implementation is consistent with the clarifications and associated requests discussed in the enclosure.

M. R. Blevins

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If you have any questions regarding this letter, please feel free to contact Balwant K. Singal at (301) 415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:  
As stated

cc w/encl: See next page

M. R. Blevins

- 2 -

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Docket Nos. 50-445 and 50-446

Enclosure:  
As stated

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Comanche Peak Steam Electric Station

(7/7/2008)

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EVALUATION BY THE OFFICE OF NUCLEAR REGULATORY COMMISSION  
OF LUMINANT GENERATION COMPANY LLC'S 3-MONTH RESPONSE  
TO GENERIC LETTER 2008-01  
COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2  
DOCKET NOS. 50-445 and 50-446

1.0 BACKGROUND

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. Specifically, the GL requested licensees to provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

2.0 LICENSEE'S PROPOSED ALTERNATIVE COURSE OF ACTION

By letter dated April 10, 2008 (ADAMS Accession No. ML081120110), Luminant Generation Company, LLC, (the licensee) submitted a 3-month response to GL 2008-01 for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The licensee stated that it will utilize laser scanning without removal of insulation to verify the as-built piping of CPSES, Units 1 and 2. In the event that laser scanning with the insulation installed does not provide sufficient accuracy, the licensee stated that the requested information pertaining to the required evaluations will not be complete by October 11, 2008, because portions of the GL subject systems are inaccessible during power operation. These sections of piping are inaccessible for the following reasons: (1) the requirement to erect scaffolding; (2) the restrictions on removal of insulation from piping; (3) entry into high radiation areas; and (4) prolonged containment entries during power operation.

Enclosure

The licensee's letter dated April 10, 2008, further indicates the following course of action:

1. If insulation removal is required, the licensee plans to complete the walkdowns of those areas only accessible during an outage during the next refueling outage for Unit 1 scheduled for fall 2008 and for Unit 2 scheduled for fall 2009. A final response containing the GL requested information will be submitted by January 31, 2009, for Unit 1 and by January 31, 2010, for Unit 2.
2. If insulation removal is not required, the licensee plans to submit a response containing the requested information by October 11, 2008, for both units.

The licensee stated that the alternative course of action is acceptable based on the following:

1. previous drawing reviews and/or design basis verifications;
2. plant-specific operational experience; and
3. the results of previous system inspections.

Based on the above considerations, the licensee stated that it believes that subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. As such, the licensee concluded that, if insulation removal is required, completing the walkdowns of those areas only accessible during an outage outside of the requested 9-month time frame is an acceptable alternative course of action.

### 3.0 NRC STAFF ASSESSMENT

The NRC staff finds that, with the exception of the clarifications and associated requests discussed below, that the licensee's proposed alternative course of action is acceptable based on the above-described operating experience, testing, and design basis verifications associated with managing gas accumulation at CPSES, Units 1 and 2.

The NRC staff notes examples where the licensee's 3-month submittal dated April 10, 2008, does not clearly describe the content and/or schedule for the 9-month submittals. Specifically, regarding the licensee's proposed course of action if insulation removal is required, it is not clear that the "final response" is intended to be a supplement to the October 11, 2008, response. In addition, while the licensee's proposed course of action if insulation removal is required states that a final response will be submitted by January 31, 2009, for Unit 1 and by January 31, 2010, for Unit 2, it is not clear whether it is possible these dates could be more than 90 days following startup from each refueling outage.

The NRC staff requests the licensee to submit the information requested in GL 2008-01 as follows:

1. 9-Month Initial Submittal - For the portions of the subject systems that are accessible prior to the CPSES, Units 1 and 2, refueling outages, provide all GL requested information to the NRC by October 11, 2008.

2. 9-Month Supplemental (Post-Outage) Submittals – If insulation removal is required, except for the long-term items described below, provide all remaining GL requested information for the subject systems to the NRC within 90 days following the completion of each of the fall 2008 and fall 2009 refueling outages at CPSES, Units 1 and 2, respectively.

For each of these two submittals (the 9-month initial and supplemental submittals), and consistent with the information requested in the GL, the licensees should provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

The NRC staff noted that the licensee's submittal dated April 10, 2008, did not mention other potential long-term actions that are identified in the GL. For instance, the industry is assessing whether it is necessary to perform pump testing to determine the allowable limits on ingested gas volume in pump suctions, as well as the need to develop an analysis capability to adequately predict void movement (entrapped gas) from piping on the suction side of the pumps into the pumps. It is unlikely this industry effort will be complete for the 9-month initial or supplemental submittals. Further, technical specification changes may be necessary to reflect the improved understanding achieved during response to the GL, but these cannot be fully developed for the 9-month initial or supplemental submittals. A Technical Specifications Task Force traveler may provide a generic example that can be adopted by licensees. The NRC staff requests that the licensee address in its 9-month submittal how it plans to track such long-term actions (e.g., Corrective Action Program and/or commitment tracking). The NRC plans to perform follow-up inspections of licensee responses to GL 2008-01 at all plants using a Temporary Instruction inspection procedure.