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Log # TXX-12089

10 CFR 50.54(f)

June 7, 2012

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

**SUBJECT:** COMANCHE PEAK NUCLEAR POWER PLANT, DOCKET NOS. 50-445 AND 50-446,  
90-DAY RESPONSE TO MARCH 12, 2012 INFORMATION REQUEST REGARDING  
RECOMMENDATION 9.3 OF THE NEAR-TERM TASK FORCE

**REFERENCES:** 1. NRC letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012  
2. TXX-12078, Comanche Peak Nuclear Power Plant. Docket Nos. 50-445 and 50-446, 60-day response to NRC letter "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near Term Task force Review of Insights from the Fukushima Dai-Ichi Accident," dated May 10, 2012

Dear Sir or Madam:

On March 12, 2012, the NRC staff issued the reference 1 letter. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

In reference 2 Luminant Generating Company, LLC submitted an alternative course of action for providing the requested information. The alternative course of action included revised information due dates and the basis for those dates. As described in our alternative course of action, this letter transmits to you the responses to the following information requests.

- Enclosure 5, Communications request #2
- Enclosure 5, Staffing request #3
- Enclosure 5, Staffing request #4
- Enclosure 5, Staffing request #5

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

A001  
NRC

This letter contains regulatory commitments as shown on Enclosure 5.

Should you have any questions concerning this letter, please contact Mr. Dennis Buschbaum at (254) 897-5851 or [dennis.buschbaum@luminant.com](mailto:dennis.buschbaum@luminant.com).

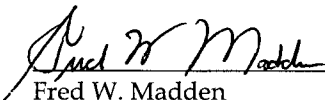
I state under penalty of perjury that the foregoing is true and correct.

Executed on June 7, 2012.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:   
Fred W. Madden  
Director, Oversight & Regulatory Affairs

- Enclosures:
1. CPNPP Response to 50.54(f) Information Request Regarding Recommendation 9.3 of the Near Term Task Force Report - EP Communications - Request #2
  2. CPNPP Response to 50.54(f) Information Request Regarding Recommendation 9.3 of the Near Term Task Force Report - EP Staffing - Request #3
  3. CPNPP Response to 50.54(f) Information Request Regarding Recommendation 9.3 of the Near Term Task Force Report - EP Staffing - Request #4
  4. CPNPP Response to 50.54(f) Information Request Regarding Recommendation 9.3 of the Near Term Task Force Report - EP Staffing - Request #5
  5. List of Regulatory Commitments

c - E. J. Leeds, Director, Office of Nuclear Reactor Regulation  
E. E. Collins, Region IV  
B. K. Singal, NRR  
Resident Inspectors, Comanche Peak

**Enclosure 1 – Comanche Peak Response to 50.54(f) Information  
Request Regarding Recommendation 9.3 of the Near Term Task  
Force Report  
EP Communications**

**Request # 2:**

Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

<b>Actions Taken or Planned</b>	<b>Estimated Completion Date</b>
Purchased additional handheld radios, with spare batteries and chargers, to be staged for use by onsite and offsite responders. Each radio has programming for CPNPP channels 1-6, and also Somervell County VFD and Sheriff's Department frequencies for coordination with offsite responders.	Completed
Purchased and awaiting delivery of twenty-four (24) satellite phones to provide an alternate communications capability in the event of unavailability of cellular and landline phones. When received, these new satellite phones will be distributed as needed to address the required emergency communications capabilities listed in NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities."	12/31/2012
Purchased and awaiting delivery of portable diesel generators to provide backup power for various installed and portable communications equipment battery chargers.	12/31/2012

**Enclosure 2 – Comanche Peak Response to 50.54(f) Information  
Request Regarding Recommendation 9.3 of the Near Term Task  
Force Report  
EP Staffing**

**Request # 3:**

Identify how the augmented staff would be notified given degraded communications capabilities.

Method	Description	Estimated Completion Date
<b>ERO Self-Activation</b>	<p>During large-scale natural disaster events when the ERO has not been activated and area communications (e.g., pagers, cell towers, internet, land-line phones) are challenged and/or not working, CPNPP ERO personnel are expected to report to their Emergency Response Facility if they cannot contact the plant for additional guidance. If the site is inaccessible due to the event (e.g. bridges damaged, roads blocked with debris, etc.) the ERO should report to the Alternate EOF on Hwy 51 north of Granbury and prepare for rapid response when access to the site is arranged or becomes available.</p> <p>ERO self-activation expectations have been communicated to ERO staff and will be included in the 2012 ERO annual requalification training given to all ERO personnel.</p>	12/31/2012

**Enclosure 3 – Comanche Peak Response to 50.54(f) Information  
Request Regarding Recommendation 9.3 of the Near Term Task  
Force Report  
EP Staffing**

**Request # 4:**

Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

<b>Method</b>	<b>Description</b>	<b>Estimated Completion Date</b>
<b>Roadway and/or Air</b>	<p>Access to the CPNPP site is available by means of vehicle or pedestrian traffic via a plant access road connecting to FM 56. This farm-to-market road connects to US Hwy 377 to the north and US Hwy 67 to the south. There are numerous detour routes available to bypass obstructions or impediments along these roadways after a widespread large-scale natural event.</p> <p>To assist the ability of augmentation staff to reach the site, CPNPP is revising the existing letter of agreement (LOA) with the Texas Department of Public Safety (DPS) specifically to obtain logistical support for the transport of emergency responders to the site in the event of a large-scale natural disaster that inhibits site access.</p>	7/31/2012

**Enclosure 4 – Comanche Peak Response to 50.54(f) Information  
Request Regarding Recommendation 9.3 of the Near Term Task  
Force Report  
EP Staffing**

**Request # 5:**

Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

<b>Interim Actions Taken or Planned</b>	<b>Estimated Completion Date</b>
No interim actions taken or planned.	n/a

**Enclosure 5**

**List of Regulatory Commitments**

The following table identifies the regulatory commitments in this document. Any other statements in this submittal represent intended or planned actions. They are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	SCHEDULED COMPLETION DATE
ERO self-activation expectations will be included in the 2012 ERO annual requalification training given to all ERO personnel	4414380	12/31/2012
To assist the ability of augmentation staff to reach the site, CPNPP is revising the existing letter of agreement (LOA) with the Texas Department of Public Safety (DPS) specifically to obtain logistical support for the transport of emergency responders to the site in the event of a large-scale natural disaster that inhibits site access.	4414400	7/31/2012