

## ComanchePeakPE Resource

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**From:** Monarque, Stephen  
**Sent:** Tuesday, August 14, 2012 10:34 AM  
**To:** John.Conly@luminant.com; Donald.Woodlan@luminant.com; 'cp34-rai-luminant@mnes-us.com'; Eric.Evans@luminant.com; joseph tapia; 'Kazuya Hayashi'; 'Russ Bywater'; MNES RAI mailbox (cp34-rai-luminant@mnes-us.com); na3raidommailbox@dom.com  
**Cc:** ComanchePeakCOL Resource; Galvin, Dennis  
**Subject:** Comanche Peak RCOL Chapter 3 - Section 3.6.1 - RAI Number 262  
**Attachments:** RAI\_6628 (RAI 262).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 35 calendar days of **August 14, 2012**.

Note: The NRC staff requests that the RAI response include any proposed changes to the FSAR.

thanks,

Stephen Monarque  
U. S. Nuclear Regulatory Commission  
NRO/DNRL/NMIP  
301-415-1544

## **Request for Additional Information (RAI) Letter Number 262**

Issue Date: 8/14/2012

Application Title: Comanche Peak Units 3 and 4 - Dockets 52-034 and 52-035

Operating Company: Luminant Generation Company, LLC.

Docket No. 52-034 and 52-035

Review Section: 03.06.01 - Plant Design for Protection Against Postulated Piping Failures in Fluid Systems Outside Containment

Application Section: 3.6.1

### **QUESTIONS**

#### **03.06.01-1**

In Revision 3 of the RCOL application, Section 3.6, the applicant responded to COL Action Item 3.6(1) as stated in Rev. 3 of the USAPWR DCD. However, the acceptability of COL Action Item 3.6(1) as stated in Rev. 3 of the DCD was still under staff evaluation and was an Open Item. In order to address the staff concerns and to close this Open Item, the DCD applicant responded to RAI 3.6.1-9 proposing changes to the text of the COL Action Item 3.6(1). The proposed change to the DCD, which the NRC staff finds acceptable, instructs the COL applicant to update the as-design pipe hazards analysis report to include the impact of all site specific high and moderate energy piping systems.

Nonetheless, the staff evaluated the COL applicant's response to COL Action Item 3.6(1) and found this response to be insufficient to address COL Action Item 3.6(1). In its response, the applicant provided a qualitative evaluation that concludes that essential SSCs are protected from the impacts of site specific pipe breaks. A qualitative response is insufficient to address COL Action Item 3.6(1). The applicant's response only addressed the impact of site specific pipe failure over the site specific safety related SSCs, but did not take into consideration the impact of design generic pipe failure into site-specific safety related SSCs, and did not evaluate the impact of site-specific piping failure over design generic safety related SSCs.

Furthermore, the COL applicant did not provide a description of the layout of all piping systems where physical arrangement of the piping systems provides the required protection, the design basis of structures and compartments used to protect nearby essential systems or components, or the arrangements to assure the operability of safety-related features where neither separation nor protective enclosures are practical. Additionally, the COL Applicant did not provide the failure modes and effect analyses (FMEA) to verify that the consequences of failures in site-specific high-energy and moderate-energy piping does not affect the ability to safely shut down the plant.

The COL Applicant is requested to **(a)** modify the response to COL Action Item 3.6(1) in order to address all the items identified in COL Action Item 3.6(1) and **(b)** to address the COL Action Item 3.6(1) changes introduced in response to USAPWR DCD RAI response 3.6.1-9.