

PMComanchePeakPEm Resource

From: ComanchePeakCOL Resource
Sent: Wednesday, February 20, 2013 5:23 PM
To: PMComanchePeakPEm Resource
Subject: FW: 2013-01-29 Woodlan DCD references in the FSAR

From: Woodlan, Don [<mailto:Donald.Woodlan@luminant.com>]
Sent: Wednesday, January 30, 2013 6:49 AM
To: Monarque, Stephen
Cc: Conly, John; Evans, Todd; Bird, Bobby; nicholas_kellenberger@mnes-us.com; Michael_Melton@mnes-us.com; Hamzehee, Hossein
Subject: 2013-01-29 Woodlan DCD references in the FSAR

Steve,

There have been some concerns lately about DCD references in the FSAR. It is understandable that some of the references may be confusing to the COLA FSAR reviewers. Below are some explanations that I hope will help. In some cases, we may need clarifying conference calls.

In general, the FSAR references the last submitted version of the DCD. For example, FSAR revision 2 referenced DCD revision 3. So when the FSAR revision 2 referred to a specific chapter, section, sub-section, paragraph and sentence in the DCD, the FSAR was referring to the sentence in DCD revision 3.

References in FSAR revision 3 (June 2012) were tied to DCD revision 3 Tracking Report (TR) Revision 2 (April 2012). Luminant chose to tie the FSAR revision to this Tracking Report because DCD revision 3 had been issued in March 2011 and Luminant felt it would be more useful to the NRC reviewers if the FSAR was tied to the most up-to-date DCD information received by the NRC.

When Luminant responds to an RAI and when MHI produces a marked-up DCD in response to an RAI (or for other reasons other than a DCD revision), Luminant does not immediately update the DCD references in the FSAR. It does not make sense and would provide little value to try and stay aligned with a moving target. There have been exceptions. For example, DCD chapter 9 was extensively revised/updated following audits and RAI responses. When Luminant received subsequent RAIs, the responses and FSAR mark-ups did not align with the most recent DCD revision. The Luminant response only made sense if the FSAR mark-ups were aligned with the DCD mark-ups provided in the most recent TR (at the time TR Revision 0).

Luminant attempts to update all the references to the DCD each FSAR revision. The DCD is scheduled to be revised (revision 4) in August 2013. Luminant intends to issue an FSAR revision (revision 4) in November 2013. The DCD references in FSAR revision 4 will be updated to be aligned with the DCD text in DCD revision 4.

I hope this is helpful. If not sufficient for some specific FSAR sections, please let me know and we will try to arrange some conference calls. In some cases, it may be sufficient to wait for FSAR revision 4.

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