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July 21, 2014

Mr. Marc L. Dapas
Regional Administrator of Region IV
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd.
Arlington, Texas 76011-4511

**SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
IMPLEMENTATION OF LICENSE AMENDMENT AND
SPENT FUEL POOLS REGION II CONFIGURATION CHANGES**

- REFERENCE:**
1. Letter from Elmo Collins of the NRC to Rafael Flores of Luminant Power, dated October 22, 2012, regarding, "Confirmatory Action Letter (4-12-004) – Comanche Peak Nuclear Power Plant, Units 1 and 2, Commitments Regarding Spent Fuel Pool Storage Practices."
 2. Letter from Balwant Singal of the NRC to Rafael Flores of Luminant Power, dated July 1, 2014, regarding Comanche Peak Nuclear Power Plant, Units 1 and 2 – Issuance of amendment re: Revision to Technical Specification 3.7.16, "FUEL STORAGE POOL BORON CONCENTRATION," 3.7.17, "SPENT FUEL ASSEMBLY STORAGE," 4.3, "FUEL STORAGE," and 5.5, "PROGRAMS AND MANUALS"

Dear Mr. Dapas:

As specified in Reference 1, Luminant Generating Company LLC (Luminant Power) is communicating the intent to change the configuration in the Region II spent fuel storage racks in support of implementation of License Amendment 162 regarding spent fuel pool criticality (Reference 2).

These changes to Region II of the spent fuel pools are currently planned to begin on August 11. Luminant Power will conduct License Amendment implementation activities as described below:

- At the time the License Amendment is implemented, some fuel assemblies in the SFP Region II storage racks will not meet the new LCO, thus requiring entry into the appropriate Tech Spec Required Action statement until the LCO can be satisfied.

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- Fuel moves will be accomplished over two (2) shifts, approximately 22 hours per day, observing appropriate work hour rules. Only fuel movement necessary to restore the Spent Fuel Pool configuration to within the limits of the new Tech Spec LCO will occur until the LCO is satisfied. Subsequently, the Tech Spec Required Action statement will be exited.
- 88 fuel moves (approximately 36 hours) will be performed to relocate fuel into acceptable locations, satisfying the new Tech Spec LCO.
- Fuel movement will continue, beyond the 88 initial fuel moves, to prepare the spent fuel pools for the upcoming refueling outage this fall. An additional 274 moves are planned to occur in the Spent Fuel Pool to clear spaces in Region I for outage core offload. This is in addition to the movement of 92 new fuel assemblies into the Region I racks for the outage.

As required by the Confirmatory Action letter, Luminant Power will notify you in writing once the remaining actions have been completed. This communication contains no new commitments regarding Comanche Peak Units 1 and 2.

Should you have any questions, please contact Mr. J. D. Seawright at (254) 897-0140.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: 
Fred W. Madden
Director, External Affairs

c - W. Walker, Region IV
B. K. Singal, NRR
Resident Inspectors, Comanche Peak