

VISTRA ENERGY



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CP-201900439
TXX-19075

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

Ref 10 CFR 50.54(f)

7/23/2019

SUBJECT: Comanche Peak Nuclear Power Plant (CPNPP)
Docket Nos. 50-445 and 50-446
Flooding Focused Evaluation Summary Report – Additional Information

Reference 1. Vistra OpCo letter logged TXX-17076, from Thomas P. McCool to the NRC, dated September 7, 2017, "Flooding Focused Evaluation Summary Report" (ADAMS No. ML17268A147)

In accordance with 10 CFR 50.54(f) Vistra Operations Company LLC (Vistra OpCo) submits this letter to provide additional information regarding the previously transmitted Flooding Focused Evaluation Summary Report (Reference 1).

As result of subsequent discussions between the NRC staff (Joe Sebrosky) and Comanche Peak Nuclear Power Plant Staff (Carl Corbin), the items in Attachment 1 are new regulatory commitments. These items were previously discussed in Reference 1 and are now identified as regulatory commitments.


AD10
NRR

Should you have any questions, please contact Carl B. Corbin at (254) 897-0121 or carl.corbin@luminant.com.

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

Executed on July 23, 2019.

Sincerely,



Thomas P. McCool

Attachment 1 List of Regulatory Commitments

c - Scott A. Morris, Region IV
Mark Haire, Region IV
Natreon Jordan, NRR
Joe Sebrosky, NRR
Resident Inspectors, Comanche Peak

List of Regulatory Commitments

The following table identifies those actions committed to in this document by Vistra Operations Company LLC (Vistra OpCo) for Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2. Any other statements in this submittal are provided for informational purposes and are not considered to be regulatory commitments.

NUMBER	COMMITMENT	STATUS
5785951	Procedures are revised to increase the margin for closure of pathways (created by removal of Circulating Water components for maintenance) to the squaw creek reservoir for the probable maximum flood (see TXX-17076 / NRC Adams ML17268A147 for additional information).	Incorporated
5785958	The preventative maintenance program is revised to ensure that the credited storm drainage piping is adequately maintained, and fuel oil storage tank covers are maintained watertight (see TXX-17076 / NRC Adams ML17268A147 for additional information).	Incorporated
5785962	An evaluation of the available physical margin (APM) for local intense precipitation (LIP) using Appendix B in NEI 16-05 showed that there is adequate margin for Key SSCs and that LIP flood protection features are reliable, noting the exception for the northwest drainage system outlet scour protection that has been entered into the corrective action program (i.e., CR-2017-009030) for resolution. See TXX-17076 / NRC Adams ML17268A147 for additional information.	Open Scheduled completion date is December 31, 2019.