



**Luminant**

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CP-201100171  
TXX-11014

Ref: 10CFR50.54(a)

May 3, 2011

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)  
DOCKET NOS. 50-445 AND 50-446  
REQUEST FOR A CHANGE TO THE QUALITY ASSURANCE PLAN INVOLVING  
A REDUCTION IN COMMITMENT**

Dear Sir or Madam:

In accordance with the provisions of Title 10 of the Code of Federal Regulations (10CFR) 50.54(a), Luminant Power is submitting a request for a change to the Quality Assurance (QA) Program which involves reduction of a commitment to the QA Program (FSAR Chapter 17) previously accepted by the NRC.

The proposed change revises FSAR section 17.2.15, "Nonconforming Material, Parts, or Components," and an associated commitment, to allow use of a conditional release to install a nonconforming item in the plant, and declare the affected component operable per Technical Specifications (TS), provided that an evaluation of the nonconforming condition supports Technical Specification operability.

Currently, FSAR section 17.2.15 allows for a conditional release to install a nonconforming item in the plant, "provided credit is not taken for Technical Specification operability of the item." The FSAR change is being made to provide plant operational flexibility and to prevent unnecessary plant mode changes and shutdowns.

The proposed change expands our current QA Program provisions by allowing a nonconforming item, which is not installed in the plant, to be installed in the plant in accordance with a conditional release, and take Technical Specification credit for the item, after completion of a satisfactory operability evaluation. The proposed QA Program change is a reduction in a previously accepted NRC commitment. However, because of the additional requirement to complete an operability evaluation prior to taking Technical Specification credit for the newly installed item, the proposed QA Program is comparable to current QA Program requirements. The current QA Program requires tracking resolution of nonconforming items and this requirement will remain. The primary difference in the revised QA Program is the ability to restore Technical Specification operability of a failed SSC using an evaluated and operable, but nonconforming item, which was identified as nonconforming prior to its installation.

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The proposed QA Program change, including the associated program commitments and requirements, satisfies 10CFR50, Appendix B, including criterion XV, "Nonconforming Materials, Parts, or Components," which states, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation."

Luminant Power requests approval of the proposed change to the Quality Assurance (QA) Program by September 1, 2011.

Attachment 1 provides the existing FSAR page marked up to show the proposed change. Attachment 2 provides the proposed FSAR change in final typed format.

In accordance with 10CFR50.4(b)(7), a copy of this request, with attachments, is being provided to the NRC Region IV Office and the CPNPP NRC Resident Inspectors.

If you should have any questions regarding this submittal, please contact Tom Daskam at (254) 897-0348 or Rob Slough at (254) 897-5727.

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

Executed on May 3, 2011.

Sincerely,

Luminant Generation Company, LLC

Rafael Flores

By:

  
Fred Madden

Director, Oversight and Regulatory Affairs

- Attachments –
1. Proposed FSAR Changes (Mark-Up)
  2. Proposed FSAR Changes (Re-Typed)

c - E. E. Collins, Region IV  
Balwant Singal, NRR  
Resident Inspectors, CPNPP

**Attachment 1 to TXX-11014**  
**Proposed FSAR Changes (Mark-Up)**

## CPSES/FSAR

CPSES personnel and contractor personnel working onsite are instructed regarding the purpose of, and precautions associated with, the various tags and labels used at CPSES. Proper use of tags and labels to indicate inspection, test, and operating status is verified through evaluations by the Quality Assurance Group.

### 17.2.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

Requirements are established for the control of nonconforming materials, parts or components. These requirements are consistent with the provisions of Regulatory Guides 1.33, 1.38, and 1.123 as discussed in Appendix 1A(B).

Material, parts, or components found nonconforming through review, inspection, or testing are controlled by administrative procedures. These procedures provide for the following:

1. Identification of nonconforming items, prior to installation, by use of nonconformance tags, and segregation of those items, if practical, to prevent inadvertent use pending proper disposition and reinspection.
2. Identification of those individuals or organizations responsible for disposition of nonconforming items.
3. Preparation of nonconformance documents which identify nonconforming items and describe the nonconformance, the disposition of the nonconformance, and the reinspection or testing performed to determine the acceptability of the item after the disposition has been completed.
4. Review of nonconformance documents written on installed plant equipment to determine impact on operability. The administrative controls assure that nonconforming materials do not affect the operability of safety related equipment in violation of Technical Specification requirements.
5. Conditional releases allow issuance of nonconforming items from the warehouse for initial installation, and testing, and operation. ~~Conditional releases also allow operation of the item, pending disposition of the nonconformance. For nonconforming items installed with a conditional release, and affecting Technical Specifications, credit may be provided credit is not taken for Technical Specification operability of the item, provided that: a) resolution of the nonconforming condition is tracked, and b) evaluation of the nonconforming condition supports operability of the component.~~ Each conditional release also describes any limitations or special precautions required. Conditional releases are periodically evaluated as to their status and the results forwarded to management for their review.
6. Verification of the acceptability of rework/repair of items by reinspection or testing of the item as originally performed or by a method which is equivalent to the original inspection and testing method.
7. Nonconformance reports which are dispositioned "use as is" or "repair" are made part of the quality verification records associated with the items.
8. Periodic analysis of these reports to be performed and forwarded to management to show quality trends.

Responsibility for the implementation of activities related to nonconformance control including disposition and closeout is assigned to the cognizant manager of the area of concern.

**Attachment 2 to TXX-11014**  
**Proposed FSAR Changes (Re-Typed)**

## CPSES/FSAR

CPSES personnel and contractor personnel working onsite are instructed regarding the purpose of, and precautions associated with, the various tags and labels used at CPSES. Proper use of tags and labels to indicate inspection, test, and operating status is verified through evaluations by the Quality Assurance Group.

### 17.2.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

Requirements are established for the control of nonconforming materials, parts or components. These requirements are consistent with the provisions of Regulatory Guides 1.33, 1.38, and 1.123 as discussed in Appendix 1A(B).

Material, parts, or components found nonconforming through review, inspection, or testing are controlled by administrative procedures. These procedures provide for the following:

1. Identification of nonconforming items, prior to installation, by use of nonconformance tags, and segregation of those items, if practical, to prevent inadvertent use pending proper disposition and reinspection.
2. Identification of those individuals or organizations responsible for disposition of nonconforming items.
3. Preparation of nonconformance documents which identify nonconforming items and describe the nonconformance, the disposition of the nonconformance, and the reinspection or testing performed to determine the acceptability of the item after the disposition has been completed.
4. Review of nonconformance documents written on installed plant equipment to determine impact on operability. The administrative controls assure that nonconforming materials do not affect the operability of safety related equipment in violation of Technical Specification requirements.
5. Conditional releases allow issuance of nonconforming items from the warehouse for installation, testing, and operation, pending disposition of the nonconformance. For nonconforming items installed with a conditional release, and affecting Technical Specifications, credit may be taken for Technical Specification operability of the item, provided that: a) resolution of the nonconforming condition is tracked, and b) evaluation of the nonconforming condition supports operability of the component. Each conditional release also describes any limitations or special precautions required. Conditional releases are periodically evaluated as to their status and the results forwarded to management for their review.
6. Verification of the acceptability of rework/repair of items by reinspection or testing of the item as originally performed or by a method which is equivalent to the original inspection and testing method.
7. Nonconformance reports which are dispositioned "use as is" or "repair" are made part of the quality verification records associated with the items.
8. Periodic analysis of these reports to be performed and forwarded to management to show quality trends.

Responsibility for the implementation of activities related to nonconformance control including disposition and closeout is assigned to the cognizant manager of the area of concern.