



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 14, 2011

LICENSEE: Luminant Generation Company LLC

FACILITY: Comanche Peak Nuclear Power Plant, Units 1 and 2

SUBJECT: SUMMARY OF SEPTEMBER 13, 2011, PRE-LICENSING PUBLIC MEETING WITH LUMINANT GENERATION COMPANY LLC TO DISCUSS THE PROPOSED RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE (TSTF) INITIATIVE 8A FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 (TAC NOS. ME6810 AND ME6811)

On September 13, 2011, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Luminant Generation Company LLC (the licensee) at NRC Headquarters, Rockville, Maryland. The meeting notice and agenda, dated August 26, 2011, are located in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML112211968. The purpose of the meeting was to discuss the proposed license amendment request (LAR) related to Risk-Informed Technical Specification Task Force (TSTF) Initiative 8a, to relocate limiting conditions for operation (LCOs) for the reactor trip system (RTS) (associated with Technical Specification (TS) Table 3.3.1) and engineered safety features actuation system (ESFAS) instrumentation (associated with TS Table 3.3.2) from the TSs to a licensee-controlled document based on its applicability to Criterion 3 and 4 of paragraph 50.36(c)(2)(ii) of Title 10 of the *Code of Federal Regulations* (10 CFR). Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2, is the lead plant for this initiative.

The licensee's presentation slides and additional materials provided for the meeting are located at ADAMS Accession No. ML112570258. A list of meeting attendees is enclosed.

Meeting Summary

The licensee's slide presentation entitled, "Comanche Peak Lead Plant LAR to Relocate Tech Spec 3.3.1 and 3.3.2 LCOs that do not Satisfy Any of the Criteria of 10CFR50.36(c)(2)(ii)," were discussed in detail by the licensee during the meeting and consisted of the following topics:

- Purpose of the Meeting
- Purpose of the Pressurized Water Reactor Owners Group (PWROG) Program
- Background
- Precedent
- Need for the Change
- Benefits of the Change
- Summary of the March 2, 2011 NRC/PWROG Meeting
- Overall Approach
- Details of Approach
- Schedule
- Other Options Considered
- Summary and Conclusions

A number of clarifying questions were asked by the NRC staff. The following is a summary of the conclusions based on the responses provided by the licensee:

1. The licensee's evaluation will not be limited to the main LCOs 3.3.1 and 3.3.2 for the RPS and ESFAS. The licensee plans to perform a detailed evaluation for each individual function listed in TS Tables 3.3.1-1 and 3.3.2-1 to determine the functions which are the potential candidates for relocation from the TSs to a licensee-controlled document. The licensee intends to relocate these functions to the Technical Requirements Manual (TRM).
2. The licensee stated that a basic presumption is that the functions listed in the current TSs already meet the requirements of 10 CFR 50.36(c)(2)(ii). The licensee acknowledged that its detailed evaluation must provide the NRC staff with reasonable assurance for the staff to conclude that the functions proposed for relocation to the TRM continue to meet the criterion specified by 10 CFR 50.36(c)(2)(ii).
3. The licensee stated that since Criterion 3 of 10 CFR 50.36(c)(2)(ii) applies to systems, structures, or components that are part of the primary success path, the functions in the TSs for defense in depth can be relocated to a licensee-controlled document. Initially, these functions will be relocated to the TRM without any changes in installed equipment, surveillance frequencies, or any other factor. Any future changes to those functions listed in the TRM will be made in accordance with 10 CFR 50.59. The licensee further indicated that any future change to eliminate one or more of the relocated functions is not likely to satisfy the 10 CFR 50.59 test and would likely require prior NRC approval under 10 CFR 50.90.
4. The NRC staff expressed concern about the functions included in the TSs in support of analyzed transients and anticipated operational occurrences. The licensee stated that all functions in TS Tables 3.3.1-1 and 3.3.2-1 will be evaluated against Chapters 6 and 15 of the Final Safety Analysis Report (FSAR) and will be relocated only after confirmation that no credit has been taken for these functions in the safety analysis and they do not satisfy the requirements of Criterion 2.
5. The licensee stated that defense in depth and diversity will not be affected since some of the functions associated with TSs 3.3.1 and 3.3.2 are being relocated, not eliminated. The plant design will stay the same. The only change will be that the licensee will be able to make changes to the relocated functions in accordance with 10 CFR 50.59.

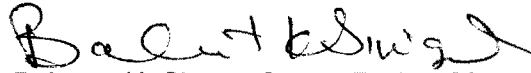
6. The licensee stated that it intends to provide detailed justifications for each function being relocated, but no information for the instruments being retained in the TSs as a result of the detailed evaluation. The NRC staff suggested that, as a minimum, a table of all of the functions evaluated should be submitted summarizing the results of the evaluation and stating the reasons for retaining or relocating each individual function including which functions were associated with the prevention or mitigation of each event and which do not. The licensee's submittal should state why the items proposed for relocation do not meet any of the 10 CFR 50.36(c)(2)(ii) criteria. The licensee acknowledged the need to provide this information.
7. The licensee proposed two probabilistic risk analysis (PRA) approaches to address Criterion 4 of 10 CFR 50.36(c)(2)(ii). The NRC staff noted that either of the PRA approaches would be acceptable.
8. The licensee stated that the functions listed on page 32 of the presentation are only examples. The licensee has not completed its evaluation all functions. The complete list will be developed later and provided in the LAR.
9. The licensee provided an update to the project schedule dates as follows:
 - Review of RTS and ESFAS functions and identification of the functions that do not satisfy Criterion 3 and 4 of 10 CFR 50.36(c)(2)(ii) to be completed by December 31, 2011.
 - The CPNPP LAR will be prepared between January 2 and March 31, 2012.
 - NRC should expect to begin its review by April 1, 2012, and will be requested to approve the LAR by March 31, 2013.

No Public Meeting Feedback Forms were received for this meeting.

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Please direct any inquiries to me at (301) 415-3016, or Balwant.Singal@nrc.gov.

Sincerely,


Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

SEPTEMBER 13, 2011, PRE-LICENSING MEETING

RISK-INFORMED TSTF INITIATIVE 8A

LUMINANT GENERATION COMPANY LLC

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

| NAME | TITLE | ORGANIZATION |
|-------------------|-----------------------------------|--|
| Balwant K. Singal | Senior Project Manager | NRC |
| David Rahn | Senior Electronics Engineer | NRC |
| Carl Schulten | Technical Specifications Engineer | NRC |
| Andrew Howe | Senior Risk Analyst | NRC |
| Joshua Miller | Reactor Systems Engineer | NRC |
| Rob Slough | Licensing Engineer | Luminant |
| Tim Hope | Manager, Nuclear Licensing | Luminant |
| Jerry Andre | Westinghouse - PRA | Westinghouse (represented Luminant) |
| Jim Andrachek | Westinghouse Licensing | Westinghouse (represented Luminant) |
| Steve Widesman* | Principal Engineer | WCNOC |

* Participated Via Phone

Abbreviations:

NRC – U.S. Nuclear Regulatory Commission

Luminant – Luminant Generation Company LLC

WCNOC – Wolf Creek Nuclear Operating Company

Enclosure

Please direct any inquiries to me at (301) 415-3016, or Balwant.Singal@nrc.gov.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
List of Attendees

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ADAMS Accession No. ML112590482

*Concurrence via e-mail

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|--------|--------------------|------------------|-----------------|-----------------|
| OFFICE | NRR/LPL4/PM | NRR/LPL4/LA | NRR/DRA/APLA/BC | NRR/DSS/SRXB/BC |
| NAME | BSingal | JBurkhardt | DHarrison* | AUises |
| DATE | 10/5/11 | 10/5/11 | 9/16/11 | 10/11/11 |
| OFFICE | NRR/DE/EICB/BC | NRR/DIRS/ITSB/BC | NRR/LPL4/BC | NRR/LPL4/PM |
| NAME | GWilson DRahn for* | RElliot* | MMarkley | BSingal |
| DATE | 9/15/11 | 9/16/11 | 10/14/11 | 10/14/11 |

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