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Ref.#10CFR50.73

CP- 201200186 TXX-12025

April 23, 2012

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

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SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT DOCKET NO. 50-446 LICENSEE EVENT REPORT 446/12-001-00, PORV BLOCK VALVE INOPERABLE FOR LONGER THAN ALLOWED BY TECHNICAL SPECIFICATIONS

Dear Sir or Madam:

Enclosed is Licensee Event Report (LER) 446/12-001-00, "PORV Block Valve Inoperable For Longer Than Allowed by Technical Specifications," for Comanche Peak Nuclear Power Plant (CPNPP) Unit 2. This letter contains the following new regulatory commitment which will be incorporated into the CPNPP licensing basis as noted.

Number Commitment

4379554 Work order instructions and procedure MSE-P0-8349 will be revised to provide steps for properly lubricating the PORV block valve motor operators.

The commitment number is used by Luminant Power for the internal tracking of CPNPP commitments.

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

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Should you have any questions concerning this submittal, please contact Mr. Tim Hope, Manager, Nuclear Licensing, at (254) 897-6370.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: add UA

Fred W. Madden Director, Oversight & Regulatory Affairs

Enclosure

c - E. E. Collins, Region IV B. K. Singal, NRR Resident Inspectors, Comanche Peak

NRC FORM 3	66 U.S	. NUCLE	AR REG	ULATORY C	ОМЙ	ISSION	AP	PROVED	BY OMB NO. 31	50-0104		E)	(PIRES	6 10/31/2013
(10-2010) LIC	ENSEE (See dig	E EVE reverse fo its/charact	NT RI r required ers for ea	EPORT (I	LER	.)	Esti req and Sec or t Info Bud doe spo	imated burd uest: 80 ho I fed back to ction (T-5 Fi by internet e ormation and dget, Washi is not displa- onsor, and a	den per response to urs. Reported lesson p industry. Send comr 53), U.S. Nuclear Re- mail to infocollects.r d Regulatory Affairs, N ngton, DC 20503. If ay a currently valid C person is not required	comply w s learned a nents regal gulatory Co esource @r IEOB-1020 a means DMB contro d to respon	ith this re incor rding bu ommissi nrc.gov, 2 (3150 used to used to ol numb d to, the	mandator porated ir rden estin on, Wash and to the -0104), Of impose a er, the Ni informatic	ry inform not the lic nate to the ington, E e Desk C ffice of M an inform RC may on collec	ation collection sensing process the FOIA/Privacy OC 20555-0001, Officer, Office of anagement and tation collection not conduct or tion.
1. FACILITY N	IAME						2.	DOCKET	NUMBER		3. P/	AGE		<u> </u>
Comanche	e Peak							05	000 446			1	OF	5
4. TITLE														
PORV Blo	ck Valve	e Inope	rable	For Longe	r Th	an Allov	ved	By Tec	hnical Specif	ication	s			
5. EV	ENT DATE	⁴ ⁴	6.	LER NUMBER		7. RE	PORT	DATE	8	. OTHER I	ACILI	TIES INV	OLVED	
MONTH		VEAD		SEQUENTIAL	REV			VEAD	FACILITY NAME		DOCK	KET NUM	BER	<u> </u>
MONTH		· TEAR	TEAR	NUMBER	NO		DAI		<u>.</u>		<u> </u>	5000		<u>.</u>
02	21	2012	2012	- 001 -	00	04	23	2012	FACILITY NAME			кет NUM 05000	BER	
9. OPERATIN	G MODE			11 THIS REPO	ORTIS	SUBMITTE	- D PUI	RSIIANT T			10 CER	S. (Che	ck all the	annly)
	1.		☐ 20. ☐ 20. ☐ 20. ☐ 20.	2201(b) 2201(d) 2203(a)(1) 2203(a)(2)(i)		20.2203(20.2203(20.2203(20.2203(50.36(c)(a)(3)(a)(3)(a)(4) (1)(i)(/	i) ii) A)	□ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i)(C) i)(A) i)(B) ii)		0.73(a)(0.73(a)(0.73(a)(0.73(a)(2)(vii) 2)(viii)(/ 2)(viii)(I 2)(ix)(A	A) 3)
10. POWER L	evel 100		☐ 20. ☐ 20. ☐ 20. ☐ 20. ☐ 20.	2203(a)(2)(ii) 2203(a)(2)(iii) 2203(a)(2)(iv) 2203(a)(2)(v) 2203(a)(2)(vi)		50.36(c)(50.36(c)(50.46(a)(50.73(a)(50.73(a)((1)(ii)((2) (3)(ii) (2)(i)(/ (2)(i)(/	A) A) 3)	□ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i □ 50.73(a)(2)(i	v)(A) /)(A) /)(B) /)(C) /)(D)		0.73(a)(; 3.71(a)(; 3.71(a)(; 3.71(a)(; 0THER pecify ir IRC Forr	2)(x) 4) 5) n Abstra n 366A	act below or in
				12.	. LICE	NSEE CC	ONTA	CT FOR T	HIS LER					
Timothy A.	⊧ . Hope, I	Manag	er Nud	clear Licen	nsing	1			TELEPHONE NUN	18ER (Incl 254	ude Are 1-897	ea Code) 7-6370)	
13. COMPLETE ONE LINE FOR EACH COMP						PONE	NT FAIL	URE DESCRIBED	IN THIS	REPO	DRT			
CAUSE	SYSTEM		PONENT	MANU- FACTURER	RE	PORTABLE TO EPIX		CAUSE	SYSTEM	СОМРО	PONENT FACTURER		REPORTABLE TO EPIX	
14. SUPPLEMENTAL REPORT EXPECTED					<u> </u>	0	15. EXPE SUBMIS DATE		MO	NTH	DAY	YEAR		
On April Power C	<i>Limit to 14</i> 8, 2011, Operated	00 space during Relief	s, i.e., ap the Un Valve (i	proximately 1 it 2 twelfth PORV) 045	5 sing refue 6 Blo	eling out	age, e Mc	an in-se otor Ope	ervice surveilla erator did not m	nce on neet the	the F mini	ressur mum r	rizer 2 equire	-01 ed stem

Power Operated Relief Valve (PORV) 0456 Block Valve Motor Operator did not meet the minimum required stem thrust in the closed direction. The PORV block valve surveillance failure was caused by degraded valve stem lubrication at the stem/stem nut area. Immediate corrective actions included removing the degraded grease from the affected PORV Block valve, applying new grease, and successfully performing the surveillance test on the valve. Work order instructions and procedure MSE-P0-8349 will be revised to provide steps for properly lubricating the PORV Block Valve Motor Operators. On February 21, 2012, Comanche Peak Nuclear Power Plant conservatively determined that the affected block valve had likely been inoperable in the past for longer than allowed by Technical Specifications and that this event was reportable per 10CFR50.73(a)(2)(i)(B) "Any operation or condition which was prohibited by the plant's Technical Specifications."

All times in this report are approximate and Central Time unless noted otherwise.

IRC FORM 366A IN-2010) LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET									
1. FACILITY NAME	2. DOCKET	6	LER NUMBER		3. PAGE				
Comanche Peak	05000446	YEAR	SEQUENTIAL NUMBER	REV NO.	2 OF 5				
		2012	- 001 -	00					
NARRATIVE									
I. DESCRIPTION OF THE REPORTABLE EV	/ENT								
 A. REPORTABLE EVENT CLASSIFICATI 10CFR50.73(a)(2)(i)(B) "Any operation Specifications." 	ION or condition wh	ich was pro	hibited by the	plant's Te	chnical				
B. PLANT CONDITION PRIOR TO EVENT									
On February 21, 2012, Comanche Peak 100% power.	Nuclear Power	Plant (CPN	IPP) Unit 2 wa	s in Mode	1 operating at				
C. STATUS OF STRUCTURES, SYSTEMS OF THE EVENT AND THAT CONTRIBL		IENTS THA	T WERE INO	PERABLE	AT THE START				
There were no structures, systems, or contributed to the event.	omponents that	were inope	rable at the st	art of the e	vent that				
D. NARRATIVE SUMMARY OF THE EVEN	NT, INCLUDING	DATES AN		IATE TIM	ES				
On April 8, 2011, Comanche Peak Nucle During an in-service Motor Operated Va Valve (PORV) 0456 Block Valve Motor O stem thrust in the closed direction. The was declared inoperable and a work ord the major inspection, the stem to stem n procedures. A pre-service test was perf and the PORV block valve was declared	ear Power Plant lve (MOV) surve Dperator [EIIS: acquired value ler was generate out lubrication w formed, all data operable.	: (CPNPP) L eillance, the (AB)(PZR)(f was 98% of ed for a maj as cleaned, acquired du	Jnit 2 was in the Pressurizer 2 RV)] did not m the allowable or inspection of inspected and iring the pre-so	the twelfth i -01 Power eet the mi . The POF of the actu I then re-lu ervice test	efueling outage. Operated Relief nimum required V block valve ator. As part of ubricated per was satisfactory,				
The PORV block valve surveillance faile nut area. The PORV block valve motor time the stem/stem nut area had been lu and 2011, but the steps in procedure MS Inspection" to clean and lubricate the ac perform, or the steps were in the proced valve. Neither the procedure nor the wo the compensator is necessary for proper configuration.	ure was caused operator had a ubricated. The SE-P0-8349, "Li cessible areas ure but were m ork order specifie r lubrication of t	by degrade refurbishme valve had m mitorque Ac of the valve arked as "N ed the need hese valves	d valve stem I ajor inspection tuator Periodi stem were eit ot Applicable" to remove the due to their s	ubrication 2000, and ns perform c Electrica ner not in t due to the compens hort stroke	at the stem/stem this was the last ed between 2000 Il And Mechanical the procedure to position of the ator. Removal of and				
On July 15, 2011, a past operability evaluation block valve was degraded at the time of expectation that the PORV block valve with nuclear safety function of closing (and o Therefore, it was concluded that the PO last satisfactory surveillance test and the	luation was con discovery durin vould have bee pening) during a RV block valve e unsatisfactory	npleted whic g the surve n capable o a Steam Ge remained o test on Apr	ch determined illance test, the f performing its nerator Tube I perable for the il 8, 2011.	that althou ere was a s specified Rupture (S e time perio	igh the PORV reasonable design basis GTR) event. od between the				
On February 21, 2012, CPNPP conclude as-found surveillance test due to the deg PORV under full system design pressure "Any Operation or Condition Prohibited to maintenance performed on the other thr	ed that the POF graded capabilit e. As a result, t by Technical Sp ee PORV block	RV block val y of the bloc his event is pecifications valves, the	ve was inoper ck valve to full reportable per ." Based on e re is not a repo	able at the y isolate a · 10CFR50 valuations ortable col	time of the failed stuck open).73(a)(2)(i)(B), , testing, and ndition affecting				

NRC FORM 366A LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION (10-2010) CONTINUATION SHEET U.S. NUCLEAR REGULATORY COMMISSION									
1. FACILITY NAME	2. DOCKET	6	LER NUMBER	3. PAGE					
Comanche Peak	05000446	YEAR	SEQUENTIAL NUMBER	REV NO.	3 OF 5				
-		2012	- 001 -	00					
NARRATIVE									
the other three PORV block valves.									
E. THE METHOD OF DISCOVERY OF E PERSONNEL ERROR	EACH COMPO	NENT OR S	SYSTEM FAIL	URE, OR	PROCEDURAL				
During an in-service MOV surveillance, E Pressurizer 2-01 PORV 0456 Block Valv the closed direction.	Engineering per e Motor Operat	sonnel (Util or did not m	ity, Non-Licens neet the minim	sed) deter um require	mined that the ed stem thrust in				
II. COMPONENT OR SYSTEM FAILURES									
A. CAUSE OF EACH COMPONENT OR	SYSTEM FAIL	URE							
Not applicable - No component failure	es were identifie	ed during thi	s event.						
B. FAILURE MODE, MECHANISM, AND	EFFECTS OF	EACH FAI	LED COMPON	NENT					
Not applicable - No component failure	es were identifie	d during thi	s event.						
C. SYSTEMS OR SECONDARY FUNCT WITH MULTIPLE FUNCTIONS	TIONS THAT W	ERE AFFE	CTED BY FAI	LURE OF	COMPONENTS				
Not applicable - No component failure	s were identifie	d during thi	s event.						
D. FAILED COMPONENT INFORMATIC	N								
Not applicable - No component failure	es were identifie	d during thi	s event.						
III. ANALYSIS OF THE EVENT									
A. SAFETY SYSTEM RESPONSES TH	AT OCCURREI	C							
Not applicable - No safety system res	ponses occurre	ed as a resu	It of this event						
B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY									
Although there is no firm evidence that the PORV block valve was inoperable in the past for longer than allowed by Technical Specifications, it was conservatively concluded that the PORV block valve was likely inoperable for a period of time prior to the failed surveillance test that exceeds the allowance of Technical Specification LCO 3.4.11, "Pressurizer PORVs."									

CON	RM 366A LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET CONTINUATION SHEET CONTINUE							
1. FACILITY NAME	2. DOCKET	(6. LER NUMBER		3. PAGE			
Comanche Peak	05000446	0446 YEAR SEQUENTIAL REV NUMBER NO. 4 OF 5						
		2012	- 001 -	00				
NARRATIVE								
 C. SAFETY CONSEQUENCES AND II Final Safety Analysis Report (FSAR safety or relief valve. FSAR Section show that the pressurizer low pressi provide adequate protection against valve is not credited in this analysis, at approximately 1848 psid RCS pression FSAR Section 15.6.3, "Steam Gene credited in the accident analysis for severance of a single steam general limiting fault and is analyzed to dem values of 10CFR100. Timely opera flow and to ensure that the ruptured steamlines. In this scenario, there is a loss of off inoperable. The PORVs and their a initiate RCS depressurization, in ord the ruptured steam generator. The F phase of recovery, in order to stop t System (RCS) pressure. The PORV isolation in the event that one of the operation, the RCS pressure is exploited and the ruptured steam phase of recovery, in order to stop t System (RCS) pressure. The PORV isolation in the event that one of the operations. The RCS pressure is exploited and the competities of that are credited in the CPNPP FSA safety system functional failure per low. Based on the above, this even public was not affected. IV. CAUSE OF THE EVENT The PORV block valve surveillance failur nut area. The PORV block valve motor of time the stem/stem nut area had been ful and 2011, but the steps in procedure MS Inspection" to clean and lubricate the accident perform, or the steps were in the procedur valve. Neither the procedure nor the wor the compensator is necessary for proper V. CORRECTIVE ACTIONS 	MPLICATIONS C) Section 15.6.1 a in 15.6.1.3 states in ure and the Over is the RCS depress . However, the d assure to isolate a rator Tube Failur the PORV Block tor tube. This even onstrate that the tor response is re- steam generator fsite power assur ssociated block w PORVs are require he depressurization PORVs become exted to be signiff pected to be app any force to halt floor , although a Stea DRV block valves and DRV block valve accident analy 10CFR50.73(a)(2 t had minimal safe perator had a re- bricated. The val E-PO-8349, "Lim cessible areas of are but were mark k order specified lubrication of the	PF THE EVI addresses f that "For Un temperatur surization e egraded PC a stuck ope e" describe Valves. The ent is consi- resulting ra- equired to te does not f ned, render valves are r d eliminate) red to be op ion phase, f e required to s stuck in th cantly redu- roximately bw through m Generatu- would have sis. Theref 2)(v)(D) and fety conseq d degraded furbishmen ive had ma- itorque Acti- the valves of the need to se valves of	ENT the inadvertent nits 1 and 2, the e N-16 Reacto event." The clo DRV block valve on or leaking Po- s the only require the accident exist dered an ANS adiological dose erminate the primary-to be open position to be operable to be operable to be operable to be operable to be operable the failed POF or Tube Failure been able to the primary-to be able to closs and maintain the to be operable the failed POF or Tube Failure been able to the failed POF or Tube Failure been able to the potential s guences and the valve stem lub t in October 20 jor inspections uator Periodic tem were eithe core the core of the potential s guences and the potent	t opening of e results of r Protectic osing of a ve would h ORV. uired close amined is Condition es are with rimary-to-se nd flood th urizer spray operable to o-secondate e after the he desired during this on. During mpared to ss, enablin RV. e or leakin perform th is not rep safety sigr e health a rication at 000, and th performed Electrical <i>J</i> er not in the ue to the p compensate ort stroke a	of a pressurizer of the analysis on System signals PORV block have fully closed ed safety function the complete IV event, a hin the guideline secondary break he main y valves o open, and ry leakage into depressurization I Reactor Coolant s phase for PORV g this phase of normal power of the PORV g the PORV g the PORV g the safety functions hortable as a hificance is very nd safety of the the stem/stem his was the last d between 2000 And Mechanical e procedure to position of the tor. Removal of and configuration.			
Immediate corrective actions included re	moving the degra	ided grease	e from the affe	cted POR	V block valve,			

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1. FACILITY NAME	2. DOCKET	6. LEI	3. PAGE	
Comanche Peak	05000446	YEAR S	EQUENTIAL REV NUMBER NO.	5 OF 5
		2012 -	001 - 00	
ARRATIVE				
and procedure MSE-P0-8349 will be motor operators.	revised to provide ste	eps for properly	lubricating the POF	RV block valve
VI. PREVIOUS SIMILAR EVENTS				
There have been no previous simila	r reportable events at	CPNPP in the I	ast three years.	
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