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October 24, 2013

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

SUBJECT: REVISION OF COMMITMENT NUMBER 4457005 RELATED TO COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP) DOCKET NOS. 50-445 AND 50-446, LICENSE AMENDMENT REQUEST (LAR) 12-007, REVISION TO TECHNICAL SPECIFICATION 3.8.1, "AC SOURCES - OPERATING," FOR TWO, 14-DAY COMPLETION TIMES FOR OFFSITE CIRCUITS

REFERENCES:

1. NRC Branch Technical Position 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Time Extensions" dated Initial - February 2012.
2. Conference call with NRC and Luminant Power on October 22, 2013, concerning the subject commitment.

Dear Sir or Madam:

The purpose of this letter is to provide notification to the Nuclear Regulatory Commission (NRC) of a revision to regulatory commitment number 4457005.

License Amendment (LA) 160 to the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2 Technical Specifications (TSs) was issued by the NRC on September 18, 2012. The Safety Evaluation for LA 160 contained commitments 4456419 and 4457005. Both these commitments are identical in wording but are applicable during two distinct, but different, periods. Both commitments state:

"During a 14-day CT, if an APDG becomes unavailable, both Units shall enter Condition C of TS 3.8.1 and start shutting down within 24 hours. (This 24-hour period will only be allowed once within a 14-day CT.)"

During a teleconference on October 22, 2013 (Reference 2) with the NRC, Luminant Power proposed to revise both commitments as provided below in order to more closely align with the intent of Branch Technical Position 8-8 (Reference 1), which is Unit specific in its wording with respect to alternate alternating current power sources, and to clarify the intended application of

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the CPNPP TSs in relation to the commitments. However, since the period of applicability for commitment number 4456419 has already passed, there is no longer any need to revise commitment 4456419. Therefore, Luminant Power proposes to revise only commitment number 4457005 as provided below:

"During a 14-day CT, if an APDG becomes unavailable, the affected Unit shall enter Condition C of TS 3.8.1 and comply with the Required Actions. If the CT for the Condition C Required Actions is not met, then Condition G of TS 3.8.1 shall be entered. This allowance will only be exercised once within a 14-day CT for a given Unit. For any second, or subsequent, unavailability of an APDG for a given Unit, the affected Unit shall immediately enter TS 3.0.3. In all cases, the normal rules governing application of TSs in section 1.0 of the CPNPP TSs shall apply."

This revision to commitment 4457005 has been reviewed according to the criteria in Nuclear Energy Institute 99-04, "Guidelines for Managing NRC Commitment Changes." Based on the review, Luminant Power has concluded that notification of the intended change to the NRC is required.

If you have any questions regarding this request, please contact Tamera J. Ervin-Walker at 254-897-6902 or tamera.ervin@luminant.com.

This letter contains revised commitment as described above.

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

Executed on October 24, 2013.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: 

Thomas P. McCool
Vice President, Station Support

TJEW

c - Eric J. Leeds, Director, Office of Nuclear Reactor Regulation
Steven A. Reynolds, Region IV
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