



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION IV  
1600 E. LAMAR BLVD.  
ARLINGTON, TX 76011-4511

June 2, 2014

Rafael Flores, Senior Vice President  
and Chief Nuclear Officer  
Luminant Generation Company LLC  
Comanche Peak Nuclear Power Plant  
P.O. Box 1002  
Glen Rose, TX 76043

**SUBJECT: ERRATA FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2  
NRC TRIENNIAL FIRE PROTECTION INSPECTION REPORT  
05000445/2014008 AND 05000446/2014008**

Dear Mr. Flores:

Please replace pages 14 and A-1 from the NRC Inspection Report 05000445/2014008 and 05000446/2014008 and replace them with the pages enclosed in this letter. The purpose of this change is to correct the numbering of Unresolved Item 05000445/2013004-06 and 05000446/2013004-06 to 05000445/2013004-05 and 05000446/2013004-05, respectively.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

John L. Dixon Jr., Acting Chief  
Engineering Branch 2  
Division of Reactor Safety

Docket Nos.: 50-445: 50-446  
License Nos: NPF-87, NPF-89

Enclosure:  
Inspection Report No. 05000445/2014008 and  
05000446/2014008 Pages 14 and A-1.



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ROPreports

captured in condition report CR 2010-007615, which was extended three times from December 2011 through December 2012, consequently the licensee had multiple opportunities to foresee and correct the procedure deficiencies.

The licensee entered this into the corrective action program as condition report CR-2013-000140. The corrective actions included: confirming that the same error did not exist for the other steam supply valve or for the Unit 1 transfer switch, retiring procedure CMP-EL-1006 and revising other maintenance section generic procedures that will be used to implement future circuit modifications.

Analysis. The licensee's failure to ensure that procedures provide adequate guidance for labeling and terminating cables during circuit modifications was a performance deficiency. The finding was more than minor because if left uncorrected this could have the potential to lead to a more significant safety concern. Specifically, because operation of the hot shutdown panel auxiliary feedwater transfer/isolation switch cannot be reliably performed. Using NRC Inspection Manual Chapter 0609, Appendix F, Attachment 1, "Part 1: Fire Protection SDP Phase 1 Worksheet," dated September 30, 2013, the finding was determined to be of very low safety significance (Green), by answering Step 1.3.1, Question 2, because the finding did not affect the reactor to be able to reach and maintain a safe shutdown condition. The finding had a human performance cross-cutting aspect in resources because leaders failed to ensure that personnel and procedures were available and adequate to support nuclear safety [H.1].

Enforcement. Title 10 of the *Codes of Federal Regulation* Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Contrary to the above, from 1995 to 2013, the licensee failed to ensure that activities affecting quality were prescribed by documented instructions, procedures, or drawings and were accomplished in accordance with the instructions, procedures, or drawings. Specifically, procedure CMP-EL-1006, "Cable Terminations," Revision 3, did not prescribe the appropriate cable label controls when installing new cable. Since the violation was of very low safety significance and was documented in the licensee's corrective action program as condition report CR-2013-000140, it is being treated as a non-cited violation, consistent with Section 2.3.2.a of the NRC enforcement Policy: NCV 05000446/2014008-01, "Failure to Update Procedures for Cable Label Controls."

#### **40A5 Other Activities**

##### (Closed) Unresolved Item 05000445/2013004-05; 05000446/2013004-05, "Potential Motor-Operated Valve Single Spurious Operation Vulnerability"

On November 6, 2013, inspectors identified a concern and documented an unresolved item associated with the potential vulnerability of motor-operated valves to fire-induced single spurious operations. Specifically, the inspectors were concerned that a single hot short could cause the spurious operation of motor-operated valves and bypass their torque/limit switch, resulting in potential damage to the pressure boundary. The licensee had previously entered this issue into their corrective action program as

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee Personnel

M. Acosta Manager	Electrical/I&C Engineering Modification
F. Ames	Maintenance Supervisor
H. Beck	Fire Safe Shutdown Analysis Engineer
G. Bryan	Unit Supervisor-Accident Mitigation SME
C. Gibson	CB&I Consultant
J. Hammons	MT22 Electrician
J. Hicks	Regulatory Affairs
T. Hope	Nuclear Licensing Manager
B. Mays	Assistant to the CNO
J. McGaha	MT22 Electrician
M. Montellano	Nuclear Equipment Operator
R. Plunkett	Fire Protection Engineer
L. Slaughter	Cause Analyst
J. Squires	MT27 Electrician
M. Wisdom	Fire Protection System Engineer
L. Zimmerman Programs Manager	Procurement Engineering & Engineering

#### NRC Personnel

J. Dixon, Acting Branch Chief, Engineering Branch 2  
J. Kramer, Senior Resident Inspector  
R. Kumana, Resident Inspector  
G. Miller, Acting Deputy Director, Division of Reactor Safety  
F. Sanchez, Senior Resident Inspector, South Texas Project

### LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

#### Opened and Closed

05000446/2014008-01	NCV	Failure to Update Procedures for Cable Label Controls (Section 4OA3)
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#### Closed

05000445/2013004-05; 05000446/2013004-05	URI	Potential Motor-Operated Valve Single Spurious Operation Vulnerability (Section 4OA5)
05000446/2013-001-00	LER	Unit 2 Hot Shutdown Panel Transfer Switch Inoperable Due to Wiring Error (Section 4OA3)