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CP-201500334 TXX-15049

April 7, 2015

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

## SUBJECT:COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)<br/>DOCKET NOS. 50-445 AND 50-446<br/>REVISED COMPLETION DATE FOR THE COMANCHE PEAK MULTIPLE SPURIOUS<br/>OPERATION CIRCUIT INTERACTIONS RESOLUTION IMPLEMENTATION PLAN

REFERENCE: Letter logged TXX-14070, dated June 10, 2014, "Revised Completion Date for the Comanche Peak Multiple Spurious Operation Circuit Interactions Resolution Implementation Plan," from Luminant Power to the NRC

Dear Sir or Madam:

Luminant Generating Company LLC (Luminant Power) is implementing its plan to resolve multiple spurious operations (MSOs) issues at Comanche Peak, as documented in the referenced letter. This plan integrated resolution of operator manual actions (OMAs) with modifications to Comanche Peak to resolve fire protection potential circuit interactions.

The extent of the physical modifications will require work during each refueling outage through Fall 2015 for Unit 2 and Spring 2016 for Unit 1. Additional at power work (fire barrier installation) will be ongoing after the Unit 1 Spring 2016 outage. The revised completion date for the Comanche Peak Multiple Spurious Operation Circuit Interactions Resolution Implementation Plan is December 31, 2016.

Because of the timing and interaction of OMA and MSO issues, as well as the need to expeditiously address the OMA issues that were the subject of a violation, Luminant Power determined that correction of the OMA issues should precede correction of the MSO issues. The resolution of OMAs has a positive impact on MSO resolution as OMA corrective actions potentially preclude some spurious operations. The corrective actions have been carefully planned to ensure that the modifications are safely implemented with minimal impact on the plant. Resolution of OMAs aided in the resolution of the MSOs. OMA modifications will be essentially complete after 1RF17. Therefore the FSSA analysis will be revised to address the completed OMA modifications and Operations procedures will be updated by May 15, 2015.

These commitment changes were discussed with your NRC Region IV staff on March 30, 2015.

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This communication contains the following revised commitments which will be completed or incorporated into the CPNPP licensing basis as noted:

Number	Commitment	<u>Due Date</u>
4872118R1	Luminant Power will update the Operations procedures for the completed OMA modifications by May 15, 2015.	05-15-2015
4872144	Any Unit 1 FSSA modification not completed in 1RF17 will have a detailed constructability review performed in 1RF17.	COMPLETE
4510008R1	Luminant Power will complete the Comanche Peak OMA MSO Implementation Plan by the end of the Fourth Quarter of 2016.	12-31-2016

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

Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: \_\_\_\_\_\_ Tom P. McCool Vice President, Nuclear Engineering & Support

c - Marc L. Dapas, Region IV Balwant K. Singal, NRR Resident Inspectors, Comanche Peak