



**Luminant**

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CP-201501050  
TXX-15147

Ref. # 10CFR50.55a(z)(2)

November 5, 2015

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

**SUBJECT:** COMANCHE PEAK NUCLEAR POWER PLANT  
DOCKET NOS. 50-445 AND 50-446  
REVISION TO RELIEF REQUEST T-1 FOR UNITS 1 AND 2 INSERVICE TESTING  
PROGRAM FOR APPLICATION OF AN ALTERNATIVE TO THE ASME OM CODE  
FREQUENCY SPECIFICATIONS  
(2004 EDITION OF ASME OM CODE, 2006 ADDENDA  
THIRD INTERVAL START DATE: AUGUST 3, 2013  
THIRD INTERVAL END DATE: AUGUST 2, 2023)

**REFERENCE:** Letter logged TXX-15102 dated June 30, 2015 from Rafael Flores to the NRC submitting Relief Request T-1 for Units 1 and 2 Inservice Testing Program for Application of an Alternative to the ASME Code Frequency Specifications

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(z)(2), Luminant Generation Company, LLC (Luminant Power) is submitting Relief Request T-1 (see attachment) for Comanche Peak Units 1 and 2 for the third ten year inservice testing interval. Luminant Power is requesting an alternative for the frequency specifications as specified in Code Case OMN-20. Compliance with the frequency specifications of the ASME OM Code would result in a hardship without a compensating increase in the level of quality and safety.

Relief Request was originally submitted via the referenced letter on June 30, 2015. Per discussion with our NRC Project Manager on October 29, 2015, we are submitting a revision to Relief Request T-1.

Luminant Power requests approval of this relief request by March 31, 2016, to support the upcoming CPNPP Unit 1 refueling outage.

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This communication contains no new licensing basis commitments regarding Comanche Peak Units 1 and 2. Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: \_\_\_\_\_



Thomas P. McCool

Vice President, Nuclear Engineering & Support

Attachment – Relief Request T-1 Code Case OMN-20 Inservice Test Frequency

c - Marc L. Dapas, Region IV  
Balwant K. Singal, NRR  
Resident Inspectors, Comanche Peak  
Robert Free, TDLR  
Jack Ballard, ANII, Comanche Peak

**COMANCHE PEAK NUCLEAR POWER PLANT UNITS 1 & 2**  
**Relief Request Number T-1**  
**Code Case OMN-20 Inservice Test Frequency**  
**(Third 10-Year IST Interval Start Date: August 3, 2013)**

1. **ASME Code Component Affected:**

All pumps and valves contained within the Inservice Testing (IST) Program

2. **Applicable Code Edition and Addenda:**

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (i.e., OM Code), 2004 Edition through 2006 Addenda (Reference 1)

3. **Applicable Code Requirement:**

This request applies to the frequency specifications of the ASME OM Code paragraphs as identified below. The frequencies for tests given in the ASME OM Code do not include a tolerance band.

Code Reference	Description
ISTA-3120(a)	"The frequency for the inservice testing shall be in accordance with the requirements of Section IST."
ISTB-3400	Frequency of Inservice Tests
ISTC-3510	Exercising Test Frequency
ISTC-3540	Manual Valves
ISTC-3630(a)	Frequency
ISTC-3700	Position Verification Testing
ISTC-5221 (c)(3)	"At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in a group shall be disassembled and examined at least once every 8 years."
Appendix I, I-1320	Test Frequencies, Class 1 Pressure Relief valves.
Appendix I, I-1330	Test Frequencies, Class 1 Non-reclosing Pressure Relief Devices
Appendix I, I-1340	Test Frequencies, Class 1 Pressure Relief Valves that are used for Thermal relief application
Appendix I, I-1350	Test Frequencies, Class 2 and 3 Pressure Relief Valves
Appendix I, I-1360	Test Frequencies, Class 2 and 3 Non-reclosing Pressure Relief Devices
Appendix I, I-1370	Test Frequencies, Class 2 and 3 Primary Containment Vacuum Relief Valves
Appendix I, I-1380	Test Frequencies, Class 2 and 3 Vacuum Relief Valves Except for Primary Containment Vacuum Relief Valves
Appendix I, I-1390	Test Frequencies, Class 1 Pressure Relief Valves that are used for Thermal Application

4. **Reason for Request: Undue hardship without a compensating increase in the level of quality and safety (10CFR50.55a(z)(2)) .**

Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (z)(2), an alternative is being requested from the frequency specifications of the ASME OM Code for Comanche Peak Nuclear Power Plant, Units 1 and 2. The basis of the alternative request is that the Code frequency specifications present an undue hardship without a compensating increase in the level of quality and safety.

**COMANCHE PEAK NUCLEAR POWER PLANT UNITS 1 & 2**  
**Relief Request Number T-1**  
**Code Case OMN-20 Inservice Test Frequency**  
**(Third 10-Year IST Interval Start Date: August 3, 2013)**

ASME OM Code Section IST establishes the inservice test frequency for all components within the scope of the Code. The frequencies (e.g., quarterly) have historically been interpreted as "nominal" frequencies (generally as defined in the Table 3.2 of NUREG-1482, Guidelines for Inservice Testing at Nuclear Power Plants, Revision 2 (Reference 2)) and owners routinely applied the surveillance extension time period (i.e., grace period) contained in the plant Technical Specifications (TSs) Surveillance Requirements (SRs). The TSs typically allow for a less than or equal to 25% extension of the surveillance test interval to accommodate plant conditions that may not be suitable for conducting the surveillance (TS SR 3.0.2). However, Regulatory Issue Summary 2012-10, NRC Staff Position on Applying Surveillance Requirements (SRs) 3.0.2 and 3.0.3 to Administrative Controls Program Tests (Reference 3), states that SR 3.0.2 and 3.0.3 cannot be applied to TS 5.5, Programs and Manuals, for tests that are not associated with a TS SR. TS SR 3.0.2 is equivalent to SR 3.0.2 contained in NUREG-1431, Standard Technical Specifications, Westinghouse Plants (Reference 4).

The lack of a tolerance band on the ASME OM Code inservice test frequency restricts operational flexibility. There may be a conflict where a surveillance test could be required (i.e., its frequency could expire), but where it is not possible or not desired that it be performed until sometime after a plant condition or associated Limiting Condition for Operation (LCO) is within its applicability.

The NRC recognized this potential issue in the TSs by allowing a frequency tolerance as described in TS SR 3.0.2. The lack of a similar tolerance applied to OM Code testing places an unusual hardship on the plant to adequately schedule work tasks without operational flexibility.

Thus, just as with TS-required surveillance testing, some tolerance is needed to allow adjusting OM Code testing intervals to suit the plant conditions and other maintenance and testing activities. This assures operational flexibility when scheduling surveillance tests and minimizes conflict between the need to complete the surveillance and plant conditions.

**5. Proposed Alternative and Basis for Use:**

10CFR50.55a(z) states:

"Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation, or Director, Office of New Reactors, as appropriate. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:

- (1) The proposed alternative would provide an acceptable level of quality and safety;
- or
- (2) Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety."

Luminant believes that the compliance with the Code frequency specifications presents an undue hardship without a compensating increase in the level of quality and safety.

Code Case OMN-20 is included in the ASME OM Code, 2009 Edition, and is proposed for use as an alternative in determining acceptable tolerances for pump and valve test frequencies of the ASME OM Code. This code case was approved by the ASME OM Code Standards Committee in February 2012.

**COMANCHE PEAK NUCLEAR POWER PLANT UNITS 1 & 2**  
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**(Third 10-Year IST Interval Start Date: August 3, 2013)**

The requirements of Code Case OMN-20 are described below.

ASME OM, Division 1, Section IST and earlier editions and addenda of ASME OM Code specify component test frequencies based either on elapsed time periods (e.g., quarterly, 2 years) or on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance) as discussed below.

- a) Components whose test frequencies are based on elapsed time periods shall be tested at the frequencies specified in Section IST with a specified time period between tests as shown in the table below. The specified time period between tests may be reduced or extended as follows:
- 1) For periods specified as less than 2 years, the period may be extended by up to 25% for any given test.
  - 2) For periods specified as greater than or equal to 2 years, the period may be extended by up to 6 months for any given test.
  - 3) All periods specified may be reduced at the discretion of the owner (i.e., there is no minimum period requirement).

Period extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test or maintenance activities). Period extensions are not intended to be used as a routine action for mere operational convenience.

Period extensions may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) and other less than two year test frequencies not specified in the table below.

Period extensions may not be applied to the test frequency requirements specified in Subsection ISTD, Preservice and Inservice *Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants*, as Subsection ISTD contains its own rules for period extensions.

Frequency	Specified Time Period Between Tests
Quarterly (or every 3 months)	92 days
Semiannually (or every 6 months)	184 days
Annually (or every year)	366 days
x Years	x calendar years where 'x' is a whole number of years $\geq 2$

- b) Components whose test frequencies are based on the occurrence of plant conditions or events may not have their period between tests extended except as allowed by ASME OM, Division: 1, Section IST, 2009 Edition through OMa-2011 Addenda and earlier editions and addenda.

**6. Duration of Proposed Alternative:**

This proposed alternative will be utilized for the remainder of the CPNPP, Units 1 and 2, third 10-year IST interval, which began on August 3, 2013 and will end on August 3, 2023.

**COMANCHE PEAK NUCLEAR POWER PLANT UNITS 1 & 2**  
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**7. Precedents:**

The proposed alternative request for CPNPP is similar to the following approved alternative/relief requests shown below:

- 1) Alternative Request RV-01 was approved by the NRC for Quad Cities Units 1 and 2 on February 14, 2013 (ADAMS Accession No. ML13042A348).
- 2) Alternative Request RR-4-01 was approved by the NRC for Virgil C. Summer Unit 1 on November 5, 2013 (ADAMS Accession No. ML13301A767).
- 3) Alternative Request G-1 was approved by the NRC for Surry Units 1 and 2 on April 23, 2014 (ADAMS Accession No. ML14111A241).
- 4) Alternative Request G-001 was approved by the NRC for Millstone Units 2 and 3 on July 10, 2014 (ADAMS Accession No. ML14163A586).

**8. Reference:**

- 1) ASME OM Code, 2004 Edition, Addenda through 2006
- 2) NUREG-1482, Revision 2, Guidelines for Inservice Testing at Nuclear Power Plants
- 3) Regulatory Issue Summary 2012-10, NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests
- 4) NUREG-1431, Revision 4, Standard Technical Specifications, Westinghouse Plants.