

VISTRA ENERGY



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CP-201700257
TXX-17045

U. S. Nuclear Regulatory Commission
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4/27/2017

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
SUBMITTAL OF THE ANNUAL NON-RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT FOR
2016

Dear Sir or Madam:

Vistra Operating Company LLC (VistraOpCo) hereby submits for Comanche Peak Nuclear Power Plant¹ (CPNPP), the enclosed copy of the Annual Non-Radiological Environmental Operating Report for the CPNPP Radiological Environmental Monitoring Program. This report is submitted pursuant to Appendix B of the CPNPP Unit 1 and 2 Operating License Nos. NPF-87 and NPF-89. The report covers the period from January 1, 2016 through December 31, 2016 and summarizes the results of measurements and analysis of data obtained from samples collected during this interval.

This communication contains no new licensing basis commitments regarding CPNPP Units 1 and 2.

If there are any questions regarding this report, contact Steve Dixon at (254) 897-5482 or Tim Curtis at (254) 897-5660.

IEZS
NRR

¹ TEX Operations Company LLC and Comanche Peak Company LLC are the current NRC licensees. On December 14, 2016, License Amendment Request 16-003 (ML16351A200) submitted an administrative change to change the licensee name "TEX Operations Company LLC" to "Vistra Operations Company LLC".

Sincerely,



Thomas P. McCool

Enclosure(s) 1. Comanche Peak Annual Non-Radiological Environmental Operating Report for 2016

c - K. M. Kennedy, Region IV
M. Watford, NRR
Resident Inspectors, Comanche Peak

Enclosure 1

Comanche Peak Annual Non-Radiological Environmental Operating Report For
2016

LUMINANT POWER
COMANCHE PEAK NUCLEAR POWER PLANT
UNITS 1 & 2
2016
ANNUAL ENVIRONMENTAL OPERATING REPORT
(NON-RADIOLOGICAL)
FACILITY OPERATING LICENSE NOS. NPF-87 & 89

I. INTRODUCTION

This report describes implementation of the Environmental Protection Plan (EPP) for the calendar year 2016 as required by Appendix B to Facility Operating License Nos. NPF-87 & 89 for Comanche Peak Nuclear Power Plant (CPNPP) for Units 1 & 2.

During 2016, the CPNPP Non-radiological Environmental Monitoring Program was effective in implementing and monitoring all CPNPP environmental regulatory commitments. Program effectiveness in 2016 was substantiated by Luminant Corporate environmental audits and compliance evaluations of the CPNPP Environmental program.

II. SCOPE

Section 5.4.1 of the EPP requires that CPNPP submit to the NRC an Annual Environmental Operating report that shall address the following environmental protection activities:

- A. Summaries and analyses of the results of the environmental protection activities required by Section 4.2 of the EPP, including a comparison with related preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, a detailed analysis of the data and a proposed course of mitigating actions are required. Section 4.2 of the EPP pertains to results from:
 - 1. Groundwater levels and station water use monitoring.
 - 2. Water treatment facility outages impact assessment and reporting.
- B. The report shall also include:
 - 1. A list of EPP non-compliances and the associated corrective actions.
 - 2. A list of all changes in station design and operation, tests, and experiments made in accordance with Subsection 3.1 of the EPP which involved a potentially significant unreviewed environmental question.
 - 3. A list of non-routine reports submitted in accordance with Subsection 5.4.2 of the EPP.
 - 4. A summary list of Texas Pollutant Discharge Elimination System (TPDES) permit related reports relative to matters identified in Subsection 2.1 of the EPP which were submitted to the Texas Commission on Environmental Quality (TCEQ) during the report period. Subsection 2.1 of the EPP pertains to aquatic matters that are addressed by the effluent limitations, and the monitoring requirements contained in the TCEQ TPDES station wastewater discharge permit.

III. RESULTS OF ACTIVITIES

- A. As required by Subsection 4.2 of the EPP, the following are summaries and analyses of the environmental protection activities during 2016. Based on the results of these activities, there were no observed adverse environmental impacts resulting from plant operation during 2016.

1. Groundwater Pumpage

As indicated in Table 2, groundwater pumpage during 2016 averaged 0.098 gals /min. (gpm) or 51500 total gallons withdrawn for the year. This withdrawal rate represents a 28% decrease from the 2015. This was due to adding the recreation area restrooms to the system. CPNPP continues to be supplied by Somervell County Water District (SCWD) which started in January 2012. Groundwater withdrawal dropped to <1 gpm after Somervell County Water District (SCWD) became our supplier.

Groundwater withdrawn during 2016 was used primarily for potable and sanitary purposes. No groundwater was used to supplement the station's Surface Water Treatment System.

The average annual pumpage rate of 0.098 gpm for 2016 represents <1% of the predicted operational pumpage (127 gpm) identified in Section 3.3 of the Station's Environmental Report - Operational License Stage. This rate also represents approximately 0.1 % of the actual average withdrawal rate (158 gpm) reported in the Station's Final Environmental Statement - Operating License Stage (Section 5.3.1.2) for the period 1975 to May 1979.

2. Groundwater Levels

As indicated in Table 1, the groundwater level in the on-site observation well OB-3 (intersection of Highway 56 and the Plant Access Road) fluctuated during 2016 from a low level in January of 610.77 ft. Mean Sea Level (MSL) to a high level in December of 617.98 ft. MSL. Overall, the water level in OB-3 during the reporting period (January through December) increased 7.21 ft. = 2.20 m. The 2016 annual average groundwater levels in wells OB-3 and OB-4 were 616.09 ft. MSL and 555.07 ft. MSL respectively.

3. Surface Water Treatment System Operation

The station's Water Treatment System processed **183,455,000** total gallons of surface water during 2016 for plant process use. No outages in 2016 that required reporting in accordance with Section 4.2.2 of the EPP.

The following is a summary list of monthly surface water usage:

Month	Gallons Clarified
January	13,723,000
February	21,050,000
March	10,923,000
April	16,582,000
May	15,016,000
June	12,313,000
July	16,188,000
August	13,926,000
September	17,807,000
October	16,251,000
November	14,648,000
December	15,028,000
Total annual production	183,455,000

B. EPP Noncompliance and Corrective Actions - Subsection 5.4.1(1)

There were no non-compliances with the requirements of the EPP during the reporting period.

C. Changes In Station Design or Operation, Tests, and Experiments Made In Accordance With Subsection 3.1 Which Involved A Potentially Significant Unreviewed Environmental Question.

There were no changes in station design, operation, tests or experiments conducted during the reporting period that are reportable under this subsection.

D. Non-routine Reports Submitted In Accordance With Subsection 5.4.2

None

E. Texas Pollutant Discharge Elimination System (TPDES) Permit-Related Reports Relative to Matters Identified In Subsections 2.1 and 5.4.1

1. Routine monthly electronic Discharge Monitoring Reports (netDMR) for all wastewater outfalls were submitted to the Texas Commission on Environmental Quality (TCEQ) for each month during 2016.
2. Bio-monitoring was on a Quarterly frequency in 2016. All required test passed satisfactorily for the four test performed in 2016.
3. There were no excursions in 2016 with reference to TPDES wastewater discharge permit.
4. There were twenty (20) incidental spills in 2016 with none being reportable.
 - Petroleum – 11
 - Sewage – 5
 - Chemical – 3 and
 - Process Water - 1

TABLE 1

**2016 SUMMARY OF GROUNDWATER
LEVELS IN OBSERVATION WELLS**

ANNUAL GROUNDWATER LEVEL CHANGE FOR 2016:

Well OB-3: 283.36 ft. – 276.15 ft. = 7.21 ft. = 2.20 m (increase)

Well OB-4: 296.15 ft. – 293.77 ft. = 2.38 ft. = 0.52 m (increase)

NOTES:

- (1) Depth to water table (ft.)
- (2) Water table elevation (ft.) Mean Sea Level (MSL)

MONTH	WELL OB-3 (G-3)		WELL OB-4 (G-4)	
	DEPTH (1)	MSL (2)	DEPTH (1)	MSL (2)
January	283.36	610.77	296.15	551.73
February	280.91	613.22	293.09	554.79
March	279.66	614.47	292.04	555.84
April	278.21	615.92	290.01	557.87
May	277.06	617.07	288.32	559.56
June	275.89	618.24	287.17	560.71
July	275.96	618.17	288.11	559.77
August	277.43	616.7	297.15	550.73
September	276.62	617.51	296.43	551.45
October	277.71	616.42	296.68	551.20
November	277.50	616.63	294.83	553.05
December	276.15	617.98	293.77	554.11

2016 Annual Production Well Report for Recreation/Training System

Month	Well Reading Last Day of Month (gallons)	Monthly Well Total (gallons)	Well Cumulative Total (gallons)	Number Days/Month	Total Days/Year	Gallons Per Day (average)	Monthly GPM	Yearly Cumulative GPM
December	243300							
January	246800	3500	3500	31	31	112.90	0.078	0.0784
February	251400	4600	8100	28	59	164.29	0.114	0.0953
March	254200	2800	10900	31	90	90.32	0.063	0.0841
April	258000	3800	14700	30	120	126.67	0.088	0.0851
May	262500	4500	19200	31	151	145.16	0.101	0.0883
June	266600	4100	23300	30	181	136.67	0.095	0.0894
July	280200	13600	36900	31	212	438.71	0.305	0.1209
August	284300	4100	41000	30	242	136.67	0.095	0.1177
September	287100	2800	43800	31	273	90.32	0.063	0.1114
October	290400	3300	47100	31	304	106.45	0.074	0.1076
November	292600	2200	49300	30	334	73.33	0.051	0.1025
December	294800	2200	51500	31	365	70.97	0.049	0.0980
Totals			51500		365			0.0980

NOTE: All other site wells plugged

FIGURE 1
GROUNDWATER PUMPAGE
1975 THRU 2016
(GPM)



