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U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

12/20/2017

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
REVISED COMPLETION DATE FOR THE COMANCHE PEAK MULTIPLE SPURIOUS OPERATIONS
CIRCUIT INTERACTIONS RESOLUTION IMPLEMENTATION PLAN

REFERENCE: Letter logged TXX-16112 dated December 14, 2016, from Thomas P. McCool to the NRC
submitting Revised Completion Date for the Comanche Peak Multiple Spurious Operation Circuit
Interactions Resolution Implementation Plan

Dear Sir or Madam:

Vistra Operations Company LLC (Vistra OpCo) 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.

All of the design for the plant modifications for these resolutions have been engineered and completed. The various designs included addition of new operable components, fire barrier circuit protection, cable reroute/relocation, and circuit redesign to either preclude spurious operation or allow manual operation post fire.

As discussed in the reference letter, all of these modifications have been installed and completed in the plant prior to the end of 2016 with the exception of fire barrier installation for the Unit 2 Train B Power Operated Relief Valve (PORV) circuitry. The fire barrier installation was corrected during the Unit 2 refueling outage in the spring of 2017.

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These modifications made a substantial improvement in the plant response in the event of a fire. More components are directly operable from the control room. Reliance on operator manual actions in the immediate time following the initiation of a fire has been reduced. Unit differences in response to a fire have been removed. A substantial amount of components have had the control circuits hardened to decrease the amount of spuriously actuated components which will require action to mitigate or reposition. This will allow simplification of the actions to be taken in the event of a fire.

Follow on paperwork activities to update documentation and other records are ongoing. Revision of the Fire Safe Shutdown Analysis (FSSA) and update of Operations procedures are in progress and will be completed by the end of the first quarter of 2018.

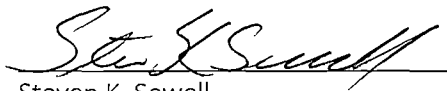
This communication contains the following revised commitment which will be completed as noted:

<u>Number</u>	<u>Commitment</u>	<u>Due Date</u>
4510008	Vistra OpCo will complete the Comanche Peak OMA MSO Implementation Plan by the end of the First Quarter of 2018.	03-29-2018

The Commitment number is used by Vistra OpCo for the internal tracking of CPNPP commitments.

Should you have questions concerning this submittal, please contact Jack C. Hicks at 254-897-6725, or e-mail at jack.hicks@luminant.com.

Sincerely,


Steven K. Sewell

c - Kriss Kennedy, Region IV
Margaret W. O'Banion, NRR
Resident Inspectors, Comanche Peak