



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 2, 2018

LICENSEE: Vistra Operations Company LLC

FACILITIES: Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2

SUBJECT: SUMMARY OF JULY 9, 2018, PUBLIC TELECONFERENCE WITH VISTRA OPERATIONS COMPANY LLC, REGARDING A LICENSE AMENDMENT REQUEST TO CHANGE TECHNICAL SPECIFICATION 3.3.2, "ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION," FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 (EPID L-2018-LLA-0081)

On July 9, 2018, a Category 1 public teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Vistra Operations Company LLC (Vistra OpCo, the licensee). The purpose of the meeting was to discuss a license amendment request dated March 29, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18102A516), which requests NRC approval of a change to Technical Specification (TS) 3.3.2, Table 3.3.2-1, "Engineered Safety Feature Actuation System Instrumentation," for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2. The meeting notice and agenda, dated June 28, 2018, are available in ADAMS at Accession No. ML18179A452. In advance of the meeting, the licensee provided presentation slides, which are available under ADAMS Accession No. ML18190A217. The enclosure to this document contains the meeting attendance list.

The NRC staff opened the discussion with a request for the licensee to give an overview of the proposed change, including changes to or introduction of new operator actions. The licensee stated that, currently, TS Table 3.3.2-1 requires automatic auxiliary feedwater (AFW) actuation to be operable in Mode 1 (Power Operation, greater than 5 percent rated thermal power) and Mode 2 (Startup, less than or equal to 5 percent rated thermal power) if there is a trip of all main feedwater pumps. The licensee is proposing to modify the Mode 2 applicability so that the AFW actuation is only required to be operable when one or more main feedwater pump(s) are supplying feedwater to the steam generators. The licensee explained that this proposed change limits the potential for a low power, overcooling transient due to inadvertent AFW actuation before the main feedwater pumps have established sufficient feedwater flow.

The licensee presented information on how the plant procedures for plant startup from hot standby will change as a result of this proposed modification to TS Table 3.3.2-1. The plant procedures will be updated to include steps to restore the automatic AFW actuation after at least one main feedwater pump is operating to feed the steam generators. The NRC staff noted that there will be a period of time when the steam generators are being fed from the main feedwater pumps and the AFW system is not yet aligned for auto start. In addition, the NRC staff questioned if the operators will respond differently if the automatic AFW actuation is not enabled when in Mode 2 and a main feedwater pump is running. In response, the licensee stated that the following will happen if the change is approved. While the AFW system is still

feeding the steam generators during startup, the operators will have the opportunity to manually control the flow of the AFW pumps, rather than both AFW pumps automatically starting at full flow if the main feedwater pump(s) trip, which could cause a low power, overcooling transient. In addition, the licensee stated that if the main feedwater pumps tripped in Mode 2 when it is the only feedwater source (i.e., AFW pumps are secured), the operators would re-establish and control the AFW flow by entering the loss of all feedwater plant abnormal operating procedure. The NRC staff also requested clarification on the sequence of events and the state of the automatic AFW actuation. The NRC staff noted that if the requested change is approved, the automatic AFW actuation will not be required during the period of time that the AFW is providing feedwater flow and the first main feedwater pump is not yet in service. As a result of the discussion, the NRC staff requested the licensee to review the license amendment request to determine if additional clarification on the proposed change is needed via a supplement.

The NRC project manager informed the licensee of the potential for the NRC staff to request additional information regarding the license amendment request, and stated that it would keep the licensee updated on the projected schedule during routine scheduling discussions with the licensee.

No members of the public attended the meeting via telephone and the NRC did not receive public meeting feedback forms.

If you have any questions, please call me at 301-415-1233 or via e-mail at [Margaret.O'Banion@nrc.gov](mailto:Margaret.O'Banion@nrc.gov).

Sincerely,

*/RA/*

Margaret W. O'Banion, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:  
List of Attendees

cc: Listserv

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**ADAMS Accession No. ML18194A777**

**\*concurrence via email**

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NRR/DE/EICB/BC*
NAME	MO'Banion	PBlechman	MWaters (RAIvarado for)
DATE	7/13/2018	7/30/2018	7/31/2018
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NAME	CFong (MMontecalvo for)	RPascarelli	MO'Banion
DATE	8/1/2018	8/2/2018	8/2/2018

**OFFICIAL RECORD COPY**

LIST OF ATTENDEES

JULY 9, 2018 PUBLIC TELECONFERENCE WITH VISTRA OPERATIONS COMPANY LLC

REGARDING PROPOSED CHANGES TO TECHNICAL SPECIFICATION 3.3.2,

“ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION”

COMANCHE PEAK NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-445 AND 50-446

<b>Name</b>	<b>Affiliation</b>
Margaret O'Banion	U.S. Nuclear Regulatory Commission (NRC)
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CJ Fong	NRC
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Huda Akhavannik	NRC
Margaret Chernoff	NRC
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Garry Struble	Vistra OpCo