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

Ref 10 CFR 50.36

9/12/2018

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NO. 50-445
SPECIAL REPORT 1-SR-18-001-00
INOPERABLE POST ACCIDENT MONITORING INSTRUMENTATION REPORT

Dear Sir or Madam:

Enclosed is a 14 day Special Report titled "COMANCHE PEAK NUCLEAR POWER PLANT – UNIT 1, SPECIAL REPORT 1-SR-18-001-00, INOPERABLE POST ACCIDENT MONITORING INSTRUMENTATION" submitted in accordance with CPNPP Technical Specification 5.6.8, PAM Report.

Because the past operability review for this particular event involved review of station records over several years, the reviews were not completed within normal expectation for timeliness. Upon completion of the reviews the PAM report, as required by Technical Specification Administrative Section 5.6.8 was completed and is attached and submitted within 14 days of completion of past operability and reportability reviews. The delay between the event occurrence and completion of required reviews has been entered into the Comanche Peak Nuclear Power Plant corrective action program.

This letter contains no new regulatory commitments.

If you have any questions regarding this submittal, please contact Garry Struble at (254) 897-6628 or garry.struble@luminant.com.

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Sincerely,

Thomas P. McCool

Enclosure: COMANCHE PEAK NUCLEAR POWER PLANT – UNIT 1, SPECIAL REPORT 1-SR-18-001-00, INOPERABLE POST ACCIDENT MONITORING INSTRUMENTATION

c – Kriss M. Kennedy, Region IV
Margaret Watford, NRR
Resident Inspectors, Comanche Peak

VISTRA OPERATIONS COMPANY LLC
COMANCHE PEAK NUCLEAR POWER PLANT – UNIT 1
SPECIAL REPORT 1-SR-18-001-00
INOPERABLE POST ACCIDENT MONITORING INSTRUMENTATION

1.0 Report Requirements

This special report is submitted in accordance with Section 5.6.8, PAM Report of the CPNPP Technical Specifications (TS). Specifically, TS Section 3.3.3, Post Accident Monitoring (PAM) Instrumentation requires the PAM Instrumentation to be OPERABLE in MODES 1, 2, and 3 for each function in Table 3.3.3-1. With one or more functions with one required channel inoperable, Condition A.1 requires the inoperable channel be restored to OPERABLE status within 30 days. If the Required Action and associated Completion Time of Condition A is not met then, Required Action B.1 requires initiating actions immediately in accordance with Specification 5.6.8.

When a report is required by the required actions of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

2.0 Event Description

The principle function of Auxiliary Feedwater Flow transmitters 1-FT-2463B and 1-FT-2464A at CPNPP is to provide flow indication to Steam Generators 1-01 and 1-02 during normal operations, during and after postulated accidents. Auxiliary Feedwater Flow transmitters 1-FT-2463B and 1-FT-2464A measure the differential pressure across an inline flow element and output that signal to a differential pressure to flow converter to provide;

- Main Control Board indication (1-FI-2463C / 1-FI-2464A)
- Remote Shutdown Panel indication (1-FI-2463D / 1-FI-2464B)
- Plant Computer indication (1-FD-2463B / 1-FD-2464A)
- Local indication at Auxiliary Feedwater Pumps (1-FI-2463F / 1-FI-2464E)

There are no control functions associated with Auxiliary Feedwater Flow transmitters 1-FT-2463B and 1-FT-2464A.

During an NRC Environmental Qualification Inspection on December 14, 2017 it was discovered that circuit boards were replaced in Rosemount transmitters 1-FT-2463B and 1-FT-2464A. The work orders performed in 2002 for both transmitters did not document replacing the cover o-ring. Due to lack of

documentation for o-ring replacement active LCOAR A1-17-0599 was entered for LCO 3.3.3, Post Accident Monitoring (PAM) Instrumentation. CPNPP assumes that without o-ring replacement documentation the inoperability for each Auxiliary Feedwater Flow channel was present for greater than the 30 days allowed by Condition A of TS 3.3.3, requiring submittal of this PAM Report.

The cover o-rings for Auxiliary Feedwater Flow transmitters 1-FT-2463B and 1-FT-2464A were replaced on December 16, 2017 and LCOAR A1-17-0599 was exited and PAM instrumentation declared OPERABLE.

3.0 Required Information

3.1 Preplanned Alternate Methods of Monitoring

As described above, the inoperability was not known until maintenance from 2002 was reviewed during the NRC Environmental Qualification Inspection. At that time each Auxiliary Feedwater Flow Transmitter was declared inoperable and maintenance was performed to restore OPERABILITY. Therefore, a preplanned alternate method of monitoring is not required for this report.

However, THESE FLOW CHANNELS ARE listed as Equipment Important to Emergency Response (EITER), Category B. As such, plant procedure STI-433.01, Maintaining Equipment Important to Emergency Preparedness, originally issued on August 26, 2013, has the following alternate indications to determine the availability of a "heat sink" for the loss of Auxiliary Feedwater Flow transmitters 1-FT-2463B and 1-FT-2464A;

- Steam Generator parameters
- RCS temperature parameters

3.2 Cause of the Inoperability

As described above the failure to document o-ring replacement caused the channels to be inoperable in a harsh environment. Once the o-rings were replaced the channels were OPERABLE.

3.3 Plans and Schedule for Restoring the Instrumentation Channels of the Function to OPERABLE Status

As stated, once the o-rings were replaced the environmental inoperability was no longer applicable to Auxiliary Feedwater Flow transmitters 1-FT-2463B and 1-FT-2464A.