VISTRA ENERGY

TXU energy | Luminant

Thomas P. McCool
Site Vice President
Luminant
P.O. Box 1002
6322 North FM 56
Glen Rose, TX 76043
o 254.897.6042

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TXX-19012

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

Ref 10 CFR 50.90
10 CFR 50.91(a)(6)
10 CFR 50.91(b)

1/31/2019

SUBJECT: Comanche Peak Nuclear Power Plant (CPNPP)
Docket Nos. 50-445 and 50-445
Commitment to Maintain Severe Accident Management Guidelines

Reference 1. Vistra OpCo letter logged TXX-15159, from Thomas P. McCool to the NRC, dated December 10, 2015, "Commitment to Maintain Severe Accident Management Guidelines" (ADAMS No. ML15357A050)

Vistra Operations Company LLC (Vistra OpCo) submits this letter to update previously identified commitments (Reference 1) related to Severe Accident Management Guidelines (SAMGs) for Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2. The updated regulatory commitments 5194898 and 5194911 are listed in Attachment 1.

The near term activity, changing the plant's configuration management process to include SAMGs, was completed by October 31, 2016 via commitment 5194898 (Attachment 1).

The longer term activity (i.e., commitment 5194911) committed to updating our site specific SAMGs to future generic SAMG revisions within three years of issuance of the generic guidelines. The Pressurized Water Reactor Owners Group (PWROG) issued a new revision of SAMGs in February 2016, such that CPNPP updated site SAMGs would be due in February 2019. CPNPP is updating commitment 5194911 by revising the due date from February 2019 to December 2019 and modifying the scope of the commitment to permit a comprehensive approach with this SAMG update.

CPNPP is currently integrating SAMGs, Flex Support Guidelines (FSG), Extreme Damage Mitigation Guidelines (EDMG), Emergency Operating Procedures (EOP), and Abnormal Conditions Procedures (ABN) in advance of implementation of approved rule 10 CFR 50.155 (ML19024A073). Development of the Guidelines and Procedures is essentially complete with the remaining activities focused on development and implementation of training. The

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revised completion date for commitment 5194911 eliminates duplication of effort associated with procedure development and training, initially for the SAMGs and then for procedures modified to comply with the new 10 CFR 50.155 rule.

Allowing update of SAMGs to PWROG SAMG Rev 0 to coincide with activities implementing the MBDBE rule is consistent with NRC MBDBE rulemaking, minimizes impact to CPNPP resources, and supports public safety for the following reasons.

The initial MBDBE rule proposed SAMGs be implemented at same time as EDMGs / EOPs since the goal was to provide an integrated response capability consisting of strategies and guidelines for beyond-design-basis external events, the loss of large areas of the plant due to explosions and fires, and severe accidents. Comprehensive and fully integrated response capabilities may be achieved with one effort thus eliminating duplication of resources. This is consistent with NEI's delivering the nuclear promise efforts, to focus on efficiency improvement while maintaining safety and reliability.

This proposed change continues to support NRC staff's planned schedule for changes to the Reactor Oversight Process (ROP) to address severe accident management guidelines. NRC letter dated February 23, 2016 (ML16032A029) identified plans to update the ROP by December 31, 2020, to allow site-specific SAMG incorporation of generic guidance revisions. Compliance with final MBDBE rule requirements associated with FLEX and EDMG strategies must be completed within 2 years and 30 days of publication the MBDBE rule in the Federal Register. CPNPP will complete (i.e., December 2019) the long term activity related to SAMGs prior to scheduled NRC ROP changes (i.e., December 2020) and implementation of the new MBDBE rule (i.e., no earlier than March 2021).

Should you have any questions, please contact Carl B. Corbin at (254) 897-0121.

Sincerely,

Thomas P. McCool

Attachment 1 List of Regulatory Commitments

c - Scott A. Morris, Region IV
Mark Haire, Region IV
Margaret Watford O'Banion, NRR
Resident Inspectors, Comanche Peak

The following table identifies those actions committed to in this document by Vistra Operations Company LLC (Vistra OpCo) for Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2. Any other statements in this submittal are provided for informational purposes and are not considered to be regulatory commitments.

NUMBER	COMMITMENT	DUE DATE	STATUS
5194898	CPNPP will consider the site SAMGs within plant configuration management processes in order to ensure that the SAMGs reflect changes to the facility over time.	October 31, 2016	Closed
5194911	Initial Scope (TXX-15159 / ML15357A050): CPNPP will update the site SAMGs to future revisions of the PWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents. Additional Scope (added by TXX-19012): CPNPP will integrate SAMGs, Flex Support Guidelines (FSG), Extreme Damage Mitigation Guidelines (EDMG), Emergency Operating Procedures (EOP), and Abnormal Conditions Procedures (ABN) to provide integrated response capability.	Original: February 2019 Revised: (TXX-19012): December 2019	Open