

VISTRA ENERGY



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

CP-201900307
TXX-19057

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

Ref 10 CFR 50.63

5/16/2019

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
UPDATED RESPONSE TO STATION BLACKOUT RULE

REFERENCES: (1) TXX-92447, Comanche Peak Steam Electric Station Response to Station Blackout (SBO) Rule, dated October 1, 1992
(2) TXX-96475, Comanche Peak Steam Electric Station, Additional information for License Amendment 96-004 Uninterruptible Power Supplies (UPS) HVAC System Addition of Fan Coil Units to technical Specifications, dated October 1, 1996
(3) USNRC Regulatory Guide 1.155, Station Blackout, August 1988
(4) NUMARC 87-00, Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors, November 1987

Dear Sir or Madam:

The letter serves to provide update of the Station Blackout (SBO) analyses for Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2. Specifically, the results of updated loss-of-ventilation calculations indicate the need expressed in prior docketed correspondence for the non-SBO Unit to power common ventilation and communications loads is no longer valid. That is to say, the Unit supposed to experience the SBO is not reliant on the non-SBO Unit in any way. The required coping duration of four (4) hours is unaffected by these changes.

*Aool
NRR*

The initial dual-Unit SBO assessment, Reference No. 1, was revised via Reference No. 2 to reflect enhanced ventilation capabilities being provided to the instrument inverter rooms. Since that time, the docketed SBO mitigation scheme has taken credit for a single emergency diesel generator (EDG) in the non-blackout Unit to power common ventilation loads, including the control room and instrument inverter rooms, and the station-wide GAITRONICS communication system as well as specific lighting. The assumed availability of the EDG is consistent with the provisions of Reference Nos. 3 and 4.

The revised analyses reflected consideration of plant configurations wherein the Technical Specifications for the non-blackout Unit do not require the operability of either of the Unit's two EDGs, Component Cooling, Service Water, or Safety Chilled Water trains. The SBO coping study and associated calculations have been revised to reflect this specific plant configuration.

This communication revises commitment number 25831 regarding CPNPP Units 1 and 2 (See Attachment to TXX-19057).

Should you have any questions, please contact Ken Vehstedt at (254) 897-6296 or Kenneth.vehstedt@luminant.com.

Sincerely,



Thomas P. McCool

Attachment

c - Scott Morris, Region IV
Natreon Jordan, NRR
Resident Inspectors, Comanche Peak

Attachment to TXX-19057

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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	STATUS
25831	Original Commitment based on TXX-92447: In the event of an SBO, operation of the AFW throttling valves will be performed locally with direct communications with the Control Room. The method of communication is GAITRONICS system which is powered by common distribution equipment that will be available during an SBO. Adequate lighting in the area is provided by fire safe shutdown battery powered lights. The power source to these lights is expected to be available in excess of the four hour coping analysis requirement. Accessibility and habitability of the turbine driven auxiliary feedwater pump room were evaluated based on the expected ambient temperature conditions. The brief intervals of exposure to temperatures in this area will not prevent the operators from performing the valve manipulations within the room.	Incorporated
	Revised Commitment based on TXX-19057 (inserted sentence is underlined): In the event of an SBO, operation of the AFW throttling valves will be performed locally with direct communications with the Control Room. The method of communication is GAITRONICS system which is powered by common distribution equipment that will be available during an SBO. <u>When GAITRONICS system is not available, either radios or sound powered phones will be used to accomplish communications during local AFW valve throttling.</u> Adequate lighting in the area is provided by fire safe shutdown battery powered lights. The power source to these lights is expected to be available in excess of the four hour coping analysis requirement. Accessibility and habitability of the turbine driven auxiliary feedwater pump room were evaluated based on the expected ambient temperature conditions. The brief intervals of exposure to temperatures in this area will not prevent the operators from performing the valve manipulations within the room.	Incorporated