

# VISTRA ENERGY



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CP-201900350  
TXX-19061

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

Ref 10 CFR 50.73

7/11/2019

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT  
DOCKET NO. 50-446  
AUTOMATIC ACTUATION OF AUXILIARY FEEDWATER SYSTEM  
LICENSEE EVENT REPORT 446/19-002-00

Dear Sir or Madam:

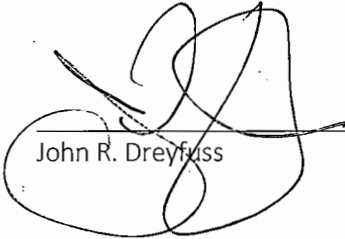
Pursuant to 10CFR50.73, Vistra Operations Company LLC (Vistra OpCo), hereby submits the enclosed Licensee Event Report 446/19-002-00, "Automatic Actuation of Auxiliary Feedwater System" for Comanche Peak Nuclear Power Plant (CPNPP) Unit 2.

This communication contains no new licensing basis commitments regarding CPNPP Unit 2.

IEZZ  
NRR

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

Sincerely,



John R. Dreyfuss

Enclosure      COMANCHE PEAK NUCLEAR POWER PLANT  
AUTOMATIC ACTUATION OF AUXILIARY FEEDWATER SYSTEM  
LICENSEE EVENT REPORT 446/19-002-00

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



**LICENSEE EVENT REPORT (LER)**

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form  
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [InfoCollects.Resource@nrc.gov](mailto:InfoCollects.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NE08-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

<b>1. Facility Name</b> Comanche Peak Nuclear Power Plant	<b>2. Docket Number</b> 05000 446	<b>3. Page</b> 1 OF 3
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**4. Title**  
Automatic Actuation of Auxiliary Feedwater System

5. Event Date			6. LER Number			7. Report Date			8. Other Facilities Involved	
Month	Day	Year	Year	Sequential Number	Rev No.	Month	Day	Year	Facility Name	Docket Number
05	14	2019	2019	002	00	07	11	2019	Facility Name	05000

**9. Operating Mode**      **11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)**

<b>1</b>	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input checked="" type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)

**10. Power Level**

<b>100</b>	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)

50.73(a)(2)(i)(C)       Other (Specify in Abstract below or in NRC Form 366A)

**12. Licensee Contact for this LER**

<b>Licensee Contact:</b> Jack C. Hicks, Manager, Regulatory Affairs	<b>Telephone Number (Include Area Code)</b> 254-897-6725
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**13. Complete One Line for each Component Failure Described in this Report**

Cause	System	Component	Manufacturer	Reportable to ICES	Cause	System	Component	Manufacturer	Reportable to ICES
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<b>14. Supplemental Report Expected</b> <input type="checkbox"/> Yes (If yes, complete 15. Expected Submission Date) <input checked="" type="checkbox"/> No	<b>15. Expected Submission Date</b>		

**Abstract** (Limit to 1400 spaces, i.e., approximately 14 single-spaced typewritten lines)  
At 2151 on May 14, 2019, Comanche Peak Nuclear Power Plant (CPNPP) experienced a loss of the Stephenville 138 KV transmission line causing the Unit 2, 6900 V Safeguards buses (2EA1 and 2EA2) to transfer to the alternate off site power source and an actuation of Train A and Train B, Unit 2 blackout sequencers and an automatic start of both Unit 2 Motor Driven Auxiliary Feedwater pumps (MDAFWPs) and the Unit 2 Turbine Driven Auxiliary Feedwater pump (TDAFWP). The Emergency Diesel Generators did not start since they were not required to start due to the successful bus transfer. There was no impact on Unit 1.

The cause of this event was a ground fault upstream of the Stephenville 138 KV transmission line causing undervoltage to CPNPP. Neither the upstream fault nor the Stephenville transmission line undervoltage were due to CPNPP equipment. The Unit 2 MDAFWPs and TDAFWP were stopped and returned to automatic. The off site source was recovered at 0256 on May 15, 2019. All times in this report are approximate and Central Daylight Time unless noted otherwise.



**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

(See NUREG-1022, R.3 for instruction and guidance for completing this form  
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1. FACILITY NAME Comanche Peak Nuclear Power Plant	2. DOCKET NUMBER 05000-446	3. LER NUMBER		
		YEAR 2019	SEQUENTIAL NUMBER 002	REV NO. 00

**NARRATIVE**

**I. DESCRIPTION OF THE REPORTABLE EVENT**

**A. REPORTABLE EVENT CLASSIFICATION**

This event is reportable under 10CFR50.73(a)(2)(iv)(A), "Any event or condition that resulted in manual or automatic actuation of any of the systems listed in paragraph (a)(2)(iv)(B) of this section." The system that actuated was the Unit 2 Auxiliary Feedwater System.

**B. PLANT CONDITION PRIOR TO EVENT**

At 2151 on May 14, 2019, Comanche Peak Nuclear Power Plant (CPNPP) Unit 2 was in MODE 1 operating at 100% power.

**C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT**

At the start of this event, the Stephenville 138 KV transmission line to the CPNPP 138 KV switchyard tripped.

**D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES**

At 2151 on May 14, 2019, CPNPP experienced a loss of the Stephenville 138 KV transmission line [EIS: (FK)(JX)]. This resulted in a transfer of the Unit 2 Safeguards buses to the alternate off site power source and an actuation of both Unit 2 blackout sequencers and an automatic start of both Unit 2 Motor Driven Auxiliary Feedwater pumps (MDAFWPs) [EIS: (BA)(P)] and the Unit 2 Turbine Driven Auxiliary Feedwater pump (TDAFWP) [EIS: (BA)(P)]. The Emergency Diesel Generators did not start since they were not required to start due to a successful bus transfer. The MDAFWPs and TDAFWP were returned to automatic. The off site source was recovered at 0256 on May 15, 2019. There was no impact on Unit 1.

**E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL PERSONNEL ERROR**

Operators (Utility, Licensed) in the Unit 2 Control Room received alarms related to "Loss Of Startup/Station Service Transformers."

**II. COMPONENT OR SYSTEM FAILURES**

**A. CAUSE OF EACH COMPONENT OR SYSTEM FAILURE**

Not applicable - There were no component or system failures with any CPNPP components during this event. The loss of the Stephenville 138 KV transmission line was caused by equipment owned by another electric company.

**B. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT**

Not applicable - No CPNPP component or system failures were identified during this event.

**C. SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS**

Not applicable - No CPNPP component or system failures were identified during this event.



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1. FACILITY NAME Comanche Peak Nuclear Power Plant	2. DOCKET NUMBER 05000- 446	3. LER NUMBER		
		YEAR 2019	SEQUENTIAL NUMBER 002	REV NO. 00

**NARRATIVE**

**D. FAILED COMPONENT INFORMATION**

Not applicable - No CPNPP component or system failures were identified during this event.

**III. ANALYSIS OF THE EVENT**

**A. SAFETY SYSTEM RESPONSES THAT OCCURRED**

The Unit 2 safeguards buses transferred to the alternate off site power source, both Unit 2 blackout sequencers actuated, and both Unit 2 MDAFWPs and the Unit 2 TDAFWP automatically started as designed.

**B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY**

This event did not involve the inoperability of any safety systems. Off site power is not credited in Chapter 15 of the CPNPP Final Safety Analysis Report, therefore, offsite power is not considered a safety system.

**C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT**

During this event, the 345kV switch yard was available and stable. Unit 2 reduced power to 92 % due to AFW auto-start and Unit 1 was not affected by this event. All plant safety systems responded as designed during this event. This event had no impact on nuclear safety, reactor safety, radiological safety, environmental safety or the safety of the public. This event has been evaluated to not meet the definition of a safety system functional failure per 10 CFR 50.73(a)(2)(v).

**IV. CAUSE OF THE EVENT**

The loss of the Stephenville 138 KV transmission line was caused by a fault in the Stephenville switchyard that is owned by another electric company.

**V. CORRECTIVE ACTIONS**

The MDAFWPs and the TDAFWP were returned to automatic. The off site source was recovered at 0256 on May 15, 2019. There were no component or system failures with any CPNPP components during this event. However the off site power provider took corrective actions with regard to relaying and line isolation to avoid future power losses.

**VI. PREVIOUS SIMILAR EVENTS**

Similar event was submitted on January 16, 2019 in Licensee Event Report 446/18-002-00.