

From: [Jordan, Natreon](#)
To: [Hicks, Jack](#)
Cc: [Corbin, Carl](#)
Subject: Acceptance Review for Comanche Peak QA Change Regarding Biennial Review of Procedures and Station Operations Review Committee Meetings (L-2019-LLQ-0002)
Date: Monday, September 16, 2019 2:29:00 PM

Mr. Hicks,

By letter dated August 14, 2019 (Agencywide Documents Access and Management System Accession No. ML19228A086), Vistra Operations Company LLC (Vistra OpCo, the licensee) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) to revise the Final Safety Analysis Report (FSAR) for the Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2 (Comanche Peak). Specifically, the licensee request approval to revise the FSAR description of (1) the biennial reviews of Emergency Response Guidelines (ERGs), Functional Restoration Guidelines (FRGs), and Abnormal Plant Operating (ABNs) procedures and (2) Station Operations Review Committee (SORC) meeting frequency for the Comanche Peak, Unit 1 and 2 facilities.

Consistent with 10 CFR 50.54(a)(3), licensees are allowed to make a change to a previously accepted QA program description without prior NRC approval, provided the change does not reduce the commitments in the program description. However, 10 CFR 50.54(a)(4) requires licensees to submit changes to the QA program description that do reduce the commitments and receive NRC approval prior to implementation. The NRC staff determined that the proposed change regarding the biennial review of non-routine procedures and the proposed change to the meeting frequency of the SORC may constitute reductions in commitment from the currently accepted quality assurance program and CPNPP's commitment to RG 1.33, Revision 2.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed review and make an assessment regarding the acceptability of the proposed request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed review, you should be aware that there may be instances in which issues that impact the NRC staff's ability to complete the detailed review are identified. You will be advised of any further information needed to support the NRC staff's detailed review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that review of the proposed request will take approximately 100 hours to complete. The NRC staff expects to complete the review of the licensing action by February 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the request and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. If you have any questions, please contact me at (301) 415-7410.

Thanks,

Natreon (Nate) Jordan

Nuclear Engineer (Project Manager)

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