VISTRA ENERGY

TXU energy | Luminant

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CP-201900415
TXX-19072

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

Ref 10 CFR 50.90
10 CFR 50.91(b)

11/07/2019

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
LICENSE AMENDMENT REQUEST (LAR) 19-002
APPLICATION TO ADOPT TSTF-563, "REVISE INSTRUMENT TESTING DEFINITIONS TO INCORPORATE THE SURVEILLANCE FREQUENCY CONTROL PROGRAM"

Dear Sir or Madam:

Pursuant to 10CFR50.90, Vistra Operations Company LLC (Vistra OpCo) hereby requests an amendment to the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89) by incorporating the attached change into the CPNPP Units 1 and 2 Technical Specifications. This change request applies to both units.

Vistra OpCo requests adoption of TSTF-563, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program." TSTF-563 revises the Technical Specification (TS) definitions of Channel Calibration, Channel Operational Test, and Trip Actuating Device Operational Test, which currently permit performance by means of any series of sequential, overlapping, or total channel steps, to allow the required frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program.

Attachment 1 provides a description and assessment of the proposed changes. Attachment 2 provides the existing TS pages marked to show the proposed changes. Attachment 3 provides revised (clean) TS pages.

Approval of the proposed amendment is requested within one year of the NRC acceptance date. Once approved, the amendment shall be implemented within 60 days.

In accordance with 10CFR50.91(b), Vistra OpCo is providing the State of Texas with a copy of this proposed amendment.

A001
NRR

This letter contains no new regulatory commitments.

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

I state under penalty of perjury that the foregoing is true and correct.

Executed on 11/07/2019

Sincerely,

Thomas P. McCool

Attachments:
1. DESCRIPTION AND ASSESSMENT
2. PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)
3. REVISED TECHNICAL SPECIFICATION CHANGES

c –

Scott Morris, Region IV
Dennis Galvin, NRR
Resident Inspectors, Comanche Peak

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ATTACHMENT 1 to TXX-19072

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

Vistra Operations Company LLC (Vistra OpCo) requests adoption of TSTF-563, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program," into the Technical Specifications (TS) of the Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2 TSTF-563 revises the Technical Specification (TS) definitions of Channel Calibration, Channel Operational Test, and Trip Actuating Device Operational Test, which currently permit performance by means of any series of sequential, overlapping, or total channel steps, to allow the required frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

Vistra OpCo has reviewed the safety evaluation for TSTF-563 provided to the Technical Specifications Task Force in a letter dated December 4, 2018. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-563. As described herein, Vistra OpCo has concluded that the justifications presented in TSTF-563 and the safety evaluation prepared by the NRC staff are applicable to CPNPP Units 1 and 2, and justify this amendment for the incorporation of the changes to the CPNPP Units 1 and 2 Technical Specifications.

A Surveillance Frequency Control Program was incorporated into the CPNPP Units 1 and 2 Technical Specifications in a license amendment dated June 29, 2012 (NRC Agency Documents Access and Management System (ADAMS) Accession No. ML12067A244).

2.2 Optional Changes and Variations

Vistra OpCo is not proposing any variations from the Technical Specification changes described in the TSTF-563 or the applicable parts of the NRC staff's safety evaluation dated December 4, 2018.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Vistra OpCo requests adoption of TSTF-563, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program," into the Technical Specifications (TS) of Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2. TSTF-563 revises the Technical Specification (TS) definitions of Channel Calibration, Channel Operational Test (COT), and Trip Actuating Device Operational Test (TADOT), which currently permit performance by means of any series of sequential, overlapping, or total channel steps, to allow the required frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program.

Vistra OpCo has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

The proposed change revises the TS definitions of Channel Calibration, COT, and TADOT to allow the frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program. All components in the channel continue to be tested. The frequency at which a channel test is performed is not an initiator of any accident previously evaluated, so the probability of an accident is not affected by the proposed change. The channels surveilled in accordance with the affected definitions continue to be required to be operable and the acceptance criteria of the surveillances are unchanged. As a result, any mitigating functions assumed in the accident analysis will continue to be performed.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change revises the TS definitions of Channel Calibration, COT, and TADOT to allow the frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program. The design function or operation of the components involved are not affected and there is no physical alteration of the plant (i.e., no new or different type of equipment will be installed). No credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases are introduced. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change revises the TS definitions of Channel Calibration, COT, and TADOT to allow the frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program. The Surveillance Frequency Control Program assures sufficient safety margins are maintained, and that that design, operation, surveillance methods, and acceptance criteria specified in applicable codes and standards (or alternatives approved for use by the NRC) will continue to be met as described in the plants' licensing basis. The proposed change does not adversely affect existing plant safety margins, or the reliability of the equipment assumed to operate in the safety analysis. As such, there are no changes being made to safety analysis assumptions, safety limits, or limiting safety system settings that would adversely affect plant safety as a result of the proposed change. Margins of safety are unaffected by method of determining surveillance test intervals under an NRC-approved licensee-controlled program.

Therefore, the proposed change does not involve a significant reduction in a margin of safety

Based on the above, Vistra OpCo concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change

ATTACHMENT 2 to TXX-19072

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

1.1 USE AND APPLICATION

1.2 Definitions

NOTE

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ACTUATION LOGIC TEST	An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state required for OPERABILITY of a logic circuit and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices.
AXIAL FLUX DIFFERENCE (AFD)	AFD shall be the difference in normalized flux signals between the top and bottom halves of an excore neutron detector.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

1.1 Definitions (continued)

CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY so that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I 131	DOSE EQUIVALENT I 131 shall be that concentration of I 131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I 131, I 132, I 133, I 134, and I 135 actually present. The determination of DOSE EQUIVALENT I 131 shall be performed using thyroid dose conversion factors from Table III of TID 14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or from Table E 7 of Regulatory Guide 1.109, Revision 1, NRC, 1977, or from ICRP 30, 1979, Supplement to Part 1, page 192 212, Table titled "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity," or from Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."

1.1 Definitions (continued)

TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)	A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.

ATTACHMENT 3 to TXX-19072

REVISED TECHNICAL SPECIFICATION CHANGES

1.1 USE AND APPLICATION

1.2 Definitions

NOTE

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Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ACTUATION LOGIC TEST	An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state required for OPERABILITY of a logic circuit and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices.
AXIAL FLUX DIFFERENCE (AFD)	AFD shall be the difference in normalized flux signals between the top and bottom halves of an excore neutron detector.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

1.1 Definitions (continued)

CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY so that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.
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1.1 Definitions (continued)

TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)	A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.