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TXX-20030

U. S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, DC 20555-0001

Ref 10 CFR 50.55a

04/10/2020

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)
DOCKET NO. 50-446
SUPPLEMENT TO INSERVICE INSPECTION (ISI) PROGRAM RELIEF REQUEST

- Reference 1. Letter TXX-20026 from Steven K. Sewell to the NRC "Inservice Inspection (ISI) and Inservice Test (IST) Program Relief Requests" dated April 7, 2020 (ML20099D059)
2. April 9, 2020 phone call between NRC and Jack Hicks, CPNPP Manager, Regulatory Affairs

Dear Sir or Madam:

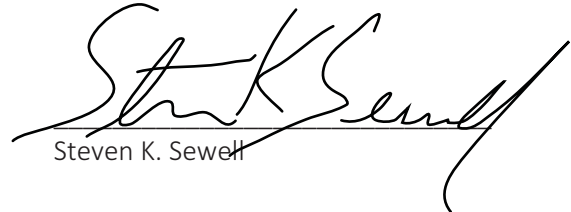
Vistra Operations Company LLC ("Vistra OpCo") provides the following clarifying information to supplement the Inservice Inspection (ISI) Program Relief Request Number 2A3-2 submitted with Reference 1:

- Section 1 of the ISI Relief Request describes the ASME Code components affected as "Comanche Peak Unit 2 ASME Class 1, 2, and 3 components and component supports." The affected components and supports are itemized in Table 1 of the request.
- The hardships associated with conducting the visual examinations (VT-3) listed in Table 1 of the ISI Relief Request are related to the availability of VT-3 qualified technicians. ASME Section XI, IWA-2300 provides specific qualification requirements per ASME Section XI and ANSI/ASNT CP-189 for ISI examiners. CPNPP has a limited number of site nondestructive examination (NDE) personnel capable of performing VT-3 examinations. CPNPP has relied on contracted personnel to perform ISI Program VT-3 examinations since initial commercial operation commenced. The contracted personnel are very proficient and accustomed to performing ISI VT-3 examinations. The site personnel qualified to perform VT-3 examinations are quality control (QC) inspectors. The availability of the QC inspectors is extremely limited due to their support of many other critical outage activities.
- Any reference to a Snubber examination in Table 1 includes only that portion of the component support not excluded from Section XI examination as defined by ASME Section XI Figure IWF-1300-1(f).

This communication contains no new commitments.

Should you have any questions, please contact James Barnette at (254) 897-5866 or james.barnette@luminant.com.

Sincerely,



Steven K. Sewell

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