From:	Galvin, Dennis
Sent:	Thursday, April 9, 2020 4:32 PM
To:	Jack Hicks (Jack.Hicks@luminant.com)
Cc:	Barnette, James; Struble, Garry; Dixon-Herrity, Jennifer; Scarbrough, Thomas
Subject:	Verbal Authorization of Comanche Peak Unit 2 Relief Request V-2, Revision 0 (L-2020-LLR-0061 and L-2020-LLR-0062)
Attachments:	l-2020-LLR-0061 Comanche Peak Check Valve Test Extension Verbal Authorization 2020-04-09.pdf; l-2020-LLR-0062 Comanche Peak Relief Valve Test Interval Extension Verbal Authorization 2020-04-09.pdf

Jack,

Please find the attached the written documentation of the verbal authorization of Comanche Peak Unit 2 Relief Request V-2, Revision 0. The verbal authorization was provided in two parts:

1. Verbal Authorization by the NRC Office of Nuclear Reactor Regulation for 10 CFR 50.55a Request V-2, Revision 0, Check Valve Examination Interval Extension (L-2020-LLR-0061)

2. Verbal Authorization by the NRC Office of Nuclear Reactor Regulation for 10 CFR 50.55a Request V-2, Revision 0, Relief Valve Test Interval Extension (L-2020-LLR-0062)

If you have any questions, please contact me at (301) 415-6256 or Dennis.Galvin@nrc.gov.

Respectfully,

Dennis Galvin
Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Licensing Project Branch 4
301-415-6256

Docket No. 50-446

Hearing Identifier: NRR_DRMA
Email Number: 519

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Subject: Verbal Authorization of Comanche Peak Unit 2 Relief Request V-2, Revision 0 (L-2020-LLR-0061 and L-2020-LLR-0062)
Sent Date: 4/9/2020 4:31:37 PM
Received Date: 4/9/2020 4:31:00 PM
From: Galvin, Dennis

Created By: Dennis.Galvin@nrc.gov

Recipients:
"Barnette, James" <James.Barnette@luminant.com>
Tracking Status: None
"Struble, Garry" <Garry.Struble@luminant.com>
Tracking Status: None
"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>
Tracking Status: None
"Scarbrough, Thomas" <Thomas.Scarbrough@nrc.gov>
Tracking Status: None
"Jack Hicks (Jack.Hicks@luminant.com)" <Jack.Hicks@luminant.com>
Tracking Status: None

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Files	**Size**	**Date & Time**
MESSAGE	881	4/9/2020 4:31:00 PM
l-2020-LLR-0061 Comanche Peak Check Valve Test Extension Verbal Authorization 2020-04-09.pdf	151430	
l-2020-LLR-0062 Comanche Peak Relief Valve Test Interval Extension Verbal Authorization 2020-04-09.pdf	155239	

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

VERBAL AUTHORIZATION BY THE NRC OFFICE OF NUCLEAR REACTOR REGULATION FOR 10 CFR 50.55a REQUEST V-2, REVISION 0, CHECK VALVE EXAMINATION INTERVAL EXTENSION

COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2

VISTRA OPERATIONS COMPANY LLC

DOCKET NO. 50-446

APRIL 9, 2020

Technical Evaluation read by Thomas G. Scarbrough, Acting Chief, Mechanical Engineering and Inservice Testing Branch, Division of Engineering and External Hazards, NRC Office of Nuclear Reactor Regulation

By letter dated April 7, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20099D059), Vistra Operations Company LLC (the licensee) proposed an alternative to specific inservice testing (IST) requirements in the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code), 2004 Edition through 2006 Addenda, for Comanche Peak Nuclear Power Plant (CPNPP), Unit 2, pursuant to Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a (10 CFR 50.55a).

In particular, the licensee submitted 10 CFR 50.55a Request V-2, Revision 0, dated April 7, 2020, which included an alternative request for NRC authorization of a one-time IST Program interval extension from the upcoming refueling outage (2RF18) to begin in the spring of 2020 to the next refueling outage (2RF19) scheduled to occur in the fall of 2021 for the performance of disassembly examination of 4 specific check valves at Comanche Peak, Unit 2, listed in the submittal. The licensee noted that ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," paragraph ISTC-5221, "Valve Obturator Movement," subparagraph (c), as incorporated by reference in 10 CFR 50.55a, requires the implementation of a sample disassembly examination program for check valves that are impractical to test per paragraph ISTC-5221, subparagraphs (a) or (b), such as the check valves specified in its submittal.

In its request dated April 7, 2020, the licensee provided justification that compliance with the ASME OM Code requirements in paragraph ISTC-5221 to disassemble and examine the 4 check valves identified in its submittal, during the upcoming refueling outage as part of the sample disassembly examination program, would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2). The licensee considered that the performance of disassembly examination for these 4 specific check valves at this time would represent a hardship due to the occupational health and safety concerns associated with pandemic-related issues pertaining to the Coronavirus Disease 2019 (COVID-19) outbreak. For example, the licensee indicated that IST activities involve close contact with personnel working in tight spaces and thereby limit social distancing capabilities. The licensee also stated that the close contact required to perform the IST activities could be detrimental to

the occupational health and safety of the workforce and result in the potential to spread the virus.

In its request, the licensee reported that its review of the maintenance and test history for the 4 specific check valves at Comanche Peak, Unit 2, listed in its submittal, showed that these check valves had no deficiencies, adverse trends, or maintenance work orders that would impact or degrade the check valve's performance capability. The licensee stated that for each of these specific check valves at Comanche Peak Unit 2, the past two disassembly examinations verified that the valve internals were structurally sound; and the visual inspection of the valve body, disc, and seat for indications of damage or degradation were completed with satisfactory results. The licensee considers that these results support an extension of the disassembly examination interval for these check valves.

Based on the information described above for the 4 check valves at Comanche Peak, Unit 2, identified in the licensee's submittal, the NRC staff finds that (1) the previous two disassembly examinations indicate their acceptable historical performance; (2) no current concerns with the performance of these check valves have been identified; (3) periodic maintenance activities are not modified by this request; and (4) a hardship exists for the performance of disassembly examination of these check valves at this time that would be contrary to the health and safety of plant personnel.

Therefore, the NRC finds that the licensee's proposed alternative in its submittal dated April 7, 2020, in accordance with 10 CFR 50.55a(z)(2), will provide reasonable assurance that the 4 specific check valves at Comanche Peak, Unit 2, identified in the licensee's submittal, will be operationally ready to perform their safety functions until the next refueling outage in the fall of 2021. All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested and approved as part of this request dated April 7, 2020, remain applicable. If the licensee identifies a performance issue with any of these check valves, the licensee will be expected to take action to implement the requirements of its Technical Specifications. This authorization will remain in effect until restart from the next refueling outage for Comanche Peak, Unit 2, in the fall of 2021. The licensee's disassembly examination plans for these check valves may be adjusted as appropriate by any subsequent NRC-authorized alternative requests.

Authorization read by Jennifer Dixon-Herrity, Chief of the Plant Licensing Branch IV, Office of Nuclear Reactor Regulation

As Chief of the Plant Licensing Branch IV, Office of Nuclear Reactor Regulation, I agree with the conclusions of the Mechanical Engineering and Inservice Testing Branch.

The NRC staff concludes that the proposed alternative for Comanche Peak, Unit 2 will provide reasonable assurance of adequate safety until the next scheduled refueling outage in the fall of 2021 when disassembly examination of 4 specific check valves may be performed.

The NRC staff finds that complying with the requirements of the ASME OM Code, as required by 10 CFR 50.55a, would result in hardship or unusual difficulty without a compensating

increase in the level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2).

Therefore, effective April 9, 2020, the NRC authorizes the use of the proposed alternative at Comanche Peak, Unit 2 until completion of the next scheduled refueling outage, scheduled for the fall of 2021. All other requirements in ASME OM Code for which relief or an alternative was not specifically requested and approved as part of this request remain applicable.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the proposed alternative while subsequently preparing the written safety evaluation.

VERBAL AUTHORIZATION BY THE NRC OFFICE OF NUCLEAR REACTOR REGULATION FOR 10 CFR 50.55a REQUEST V-2, REVISION 0, RELIEF VALVE TEST INTERVAL EXTENSION

COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2

VISTRA OPERATIONS COMPANY LLC

DOCKET NO. 50-446

APRIL 9, 2020

Technical Evaluation read by Thomas G. Scarbrough, Acting Chief, Mechanical Engineering and Inservice Testing Branch, Division of Engineering and External Hazards, NRC Office of Nuclear Reactor Regulation

By letter dated April 7, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20099D059), Vistra Operations Company LLC (the licensee) proposed an alternative to specific inservice testing (IST) requirements in the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code), 2004 Edition through 2006 Addenda, for Comanche Peak Nuclear Power Plant (CPNPP), Unit 2, pursuant to Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a (10 CFR 50.55a). In particular, the licensee submitted 10 CFR 50.55a Request V-2, Revision 0, dated April 7, 2020, which included an alternative request for NRC authorization of a one-time IST Program interval extension from the upcoming refueling outage (2R18) to begin in the spring of 2020, to the next refueling outage (2R19) scheduled to occur in the fall of 2021 for the performance of testing of 10 specific relief valves at Comanche Peak, Unit 2, listed in the request.

In its request dated April 7, 2020, the licensee provided justification that compliance with the provisions in ASME OM Code, Mandatory Appendix I, “Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants,” paragraph I-1320, “Test Frequencies, Class 1 Pressure Relief Valves,” subparagraph (a), “5-Year Test Interval,” and paragraph I-1350, “Test Frequency, Classes 2 and 3 Pressure Relief Valves,” subparagraph (a), “10-year Test Interval,” as incorporated by reference in 10 CFR 50.55a, to conduct testing of relief valves at this time would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2). The licensee considered that the performance of testing of the 10 specific relief valves identified in its submittal, at this time, would represent a hardship due to the occupational health and safety concerns associated with pandemic-related issues pertaining to the Coronavirus Disease 2019 (COVID-19) outbreak. For example, the licensee indicated that IST activities involve close contact with personnel working in tight spaces and thereby limit social distancing capabilities. The licensee also stated that the close contact required to perform the IST activities could be detrimental to the occupational health and safety of the workforce and result in the potential to spread the virus.

In its request, the licensee reported that the 7 Main Steam Safety Valves specified in its submittal are part of a 20-member valve group that is tested in accordance with ASME OM Code, Mandatory Appendix I, paragraph I-1320(a), which requires a 5-year test interval with a

20 percent sample of the valves in the group to be tested every 24 months. The licensee indicated that over the last two 5-year testing cycles for the 20-member valve group, no additional valves were required to be tested by the acceptance criteria in subparagraph I-1320(c), “Requirements for Testing Additional Valves,” in Mandatory Appendix I. Of the valves in this 20-member valve group that needed adjustment based on the as-found values, the licensee reported that extrapolation of the setpoint drift would not have reached the as-left acceptance criteria for any of these valves. For these valves listed in the submittal, the licensee had not identified any deficiencies, adverse trends, or maintenance work orders that would impact or degrade the valve’s performance capability.

In its request, the licensee indicated that three of the relief valves listed in its submittal are tested in accordance with ASME OM Code, Mandatory Appendix I, paragraph I-1350(a), which requires a 10-year test interval with 20 percent sample of the valves in the group to be tested every 48 months. With respect to relief valve 2-8708B, the licensee reported that during the last two successive tests, no adjustments have been necessary to maintain the set pressure within the acceptance criteria; and the visual inspections and seat tightness have been satisfactory. With respect to relief valve 2VD-0896, the licensee reported that this valve has been capable of performing as designed over the last two successive tests, and has experienced less than 1 pound per square inch of setpoint drift between the last two tests. With respect to relief valve 2-8855C, the licensee reported that this relief valve has performed consistently during the last two successive tests without the need for adjustment. For these valves listed in the submittal, the licensee had not identified any deficiencies, adverse trends, or maintenance work orders that would impact or degrade the valve’s performance capability.

Based on the information described above for the 10 relief valves at Comanche Peak, Unit 2, identified in the licensee’s submittal, the NRC staff finds that (1) previous testing of these relief valves indicates their acceptable historical performance; (2) no current concerns with the performance of these relief valves have been identified; (3) periodic maintenance activities are not modified by this request; and (4) a hardship exists for the performance of team-oriented testing of these relief valves at this time that would be contrary to the health and safety of plant personnel.

Therefore, the NRC finds that the licensee’s proposed alternative in its submittal dated April 7, 2020, for a one-time extension of the testing interval for the 10 relief valves at Comanche Peak, Unit 2, identified in its submittal, in accordance with 10 CFR 50.55a(z)(2), will provide reasonable assurance that the relief valves will be operationally ready to perform their safety functions until the next refueling outage in the fall of 2021. All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested and approved as part of this request dated April 7, 2020, remain applicable. If the licensee identifies a performance issue with any of these relief valves, the licensee will be expected to take action to implement the requirements of its Technical Specifications. This authorization will remain in effect until restart from the next refueling outage for Comanche Peak, Unit 2, in the fall of 2021. The licensee’s testing plans for these relief valves may be adjusted as appropriate by any subsequent NRC-authorized alternative requests.

Authorization read by Jennifer Dixon-Herrity, Chief of the Plant Licensing Branch IV, Office of Nuclear Reactor Regulation

As Chief of the Plant Licensing Branch IV, Office of Nuclear Reactor Regulation, I agree with the conclusions of the Mechanical Engineering and Inservice Testing Branch.

The NRC staff concludes that the proposed alternative for Comanche Peak, Unit 2 will provide reasonable assurance of adequate safety until the next scheduled refueling outage in the fall of 2021 when the testing of 10 specific relief valves may be performed.

The NRC staff finds that complying with the requirements of the ASME OM Code, as required by 10 CFR 50.55a, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2).

Therefore, effective April 9, 2020, the NRC authorizes the use of the proposed alternative at Comanche Peak, Unit 2 until completion of the next scheduled refueling outage, scheduled for the fall of 2021. All other requirements in ASME OM Code for which relief or an alternative was not specifically requested and approved as part of this request remain applicable.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the proposed alternative while subsequently preparing the written safety evaluation.