

**From:** Galvin, Dennis  
**Sent:** Friday, April 10, 2020 3:35 PM  
**To:** Jack Hicks (Jack.Hicks@luminant.com)  
**Cc:** Barnette, James; Struble, Garry; Dixon-Herrity, Jennifer; Mitchell, Matthew; Gonzalez, Hipo  
**Subject:** Verbal Authorization of Comanche Peak Unit 2 Relief Request 2A3-2 (L-2020-LLR-0059)  
**Attachments:** L-2020-LLR-0059 Comanche Peak ISI Inspection Deferral Verbal Authorization 2020-04-10.pdf

Jack,

Please find the attached the written documentation of the verbal authorization of Comanche Peak Unit 2 Relief Request 2A3-2.

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

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**From:** Galvin, Dennis  
**Created By:** Dennis.Galvin@nrc.gov

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VERBAL AUTHORIZATION BY THE OFFICE NUCLEAR REGULATION  
10 CFR 50.55a PROPOSED ALTERNATIVE 2A3-2 TO DEFER  
ASME CODE INSERVICE INSPECTIONS DUE TO PANDEMIC (COVID-19)  
COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2  
VISTRA OPERATIONS COMPANY LLC  
DOCKET NO. 50-446

**Technical Evaluation read by Matthew Mitchell, Chief of the Piping and Head Penetration Branch, Office of Nuclear Reactor Regulation and Hipolito Gonzalez, Chief of the Vessels and Internals Branch, Office of Nuclear Reactor Regulation**

By letter dated April 7, 2020 (Agencywide Documents Access and Management System ADAMS Accession No. ML20099D059), as supplemented by letter dated April 10, 2020 (ADAMS Accession No. ML20101L082), Vistra Operations Company LLC (Vistra OpCo, the licensee) requested an alternative to the requirements of ASME Code, Section XI. Alternative 2A3-2 pertains to the volumetric, surface, and/or visual examination of multiple ASME Code Class 1, 2, and 3 welds, supports, and welded attachments at Comanche Peak, Unit 2 as described in Table 1 of the submittal. Principal plant components addressed by the alternative include the Comanche Peak, Unit 2 pressurizer, Steam Generator 2, ASME Code Class 1 piping welds, and RHR Heat Exchanger 1. The inspections to be deferred include 17 ultrasonic examinations, nine magnetic particle or dye penetrant surface examinations, and 34 visual examinations by VT-1, VT-2, or VT-3 methods, with the majority being VT-3 examinations.

As appropriate, the inspections identified in Table 1 of the licensee's submittal were reviewed by staff of the Office of Nuclear Reactor Regulation's Vessels and Internals and Piping and Head Penetrations Branches.

Pursuant to 10 CFR 50.55a(z)(2), the licensee requested NRC approval to extend their current inspection period by 18 months and to postpone the examinations described in Table 1 of the submittal on the basis that complying with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Comanche Peak, Unit 2 is currently in the second period of the Third in-service inspection (ISI) Interval. The licensee's outage 2RF18 is the last outage of the second period and is currently scheduled to begin on April 19, 2020. Completion of the ASME Code, Section XI examinations listed in Table 1 of the submittal during 2RF18 was scheduled to meet IWB-2411, IWC-2411, IWD-2411 and IWF-2410 period completion percentages. As the second period of the Third ISI Interval ends on August 3, 2020, 2RF18 is the last scheduled opportunity to perform ASME Code, Section XI examinations and tests within the second period.

Due to the hardship caused by potential spread of the COVID-19 virus to Comanche Peak, Unit 2 personnel and the surrounding community, and the travel restrictions and quarantine requirements affecting outside contractors, the licensee is proposing that the one year inspection period extension allowed by ASME Code, Section XI, subparagraph IWA-2430(c)(3) be increased in accordance with 10 CFR 50.55a(z)(2). As an alternative, the licensee is proposing that the extension allowed by IWA-2430(c)(3) be increased to 18 months such that the inspections identified in Table 1 of the licensee's submittal may be deferred to refueling outage 2RF19 in fall 2021 due the hardship caused by COVID-19 pandemic.

In addition, the licensee provided information regarding how reasonable assurance of adequate protection will be maintained for Comanche Peak, Unit 2 with the deferral of the subject

examinations. The licensee will implement the unit's leakage monitoring program in accordance with plant Technical Specifications, procedures, and administrative controls as described in the letter dated April 7, 2020. The ability to monitor effectively for leakage during the upcoming operating cycle will provide for the prompt identification, investigation, and mitigation of leakage to maintain the integrity of the pressure boundary components for which examinations were deferred. Additionally, visual examinations of borated systems will be performed by the licensee's boric acid corrosion control program during the current 2RF18 refueling outage.

The staff noted that the licensee reported no unacceptable indications based on the previous exams for the subject components listed in Table 1 of the submittal. Further, based on its independent review of industry operating experience for component aging degradation and considering the various aging effects that might potentially be applicable over the long term, the NRC staff verified that the above components are not prone to the types aging degradation for which a six-month extension of the inspection period would prompt a component integrity concern. The NRC staff noted that the second period extension will not impact the completion of all ASME Code, Section XI exams that are required to be completed within the Third 10-year ISI Interval.

Therefore, based on the above, the NRC staff finds that (1) there is reasonable assurance that the licensee's proposed alternative has a minimal impact on safety; and (2) the licensee's hardship justification is acceptable.

CONTACTS: Chris Sydnor, NRR/DNLR/NVIB and Stephen Cumblidge, NRR/DNLR/NPHP

**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 Vessels and Internals Branch and the Piping and Head Penetrations Branch.

The NRC staff concludes that the proposed inspection deferral for Comanche Peak, Unit 2 will provide reasonable assurance of adequate safety for the subject welds, welded attachments, and supports identified in Table 1 of the licensee's letter dated April 7, 2020 submittal until the next scheduled refueling outage currently scheduled to begin October 3, 2021 when the ASME Code-required inservice examination of the subject welds and components will be performed. The NRC staff finds that complying with the inspection schedule requirements of the ASME Code, Section XI, as mandated 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) for deferral of these examinations.

Therefore, effective April 10, 2020, the NRC authorizes the use of the proposed alternative at Comanche Peak, Unit 2 until completion of the next scheduled refueling outage, currently scheduled for October 2021.

All other requirements in ASME Code, Section XI for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarification

questions regarding the proposed relief while subsequently preparing the written safety evaluation.