



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 5, 2021

MEMORANDUM TO: Lauren K. Gibson, Chief
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: Lois M. James, Senior Project Manager */RA/*
License Renewal Projects Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNIT NOS. 1
AND 2 - MEETING SUMMARY FOR SAFETY PRE-SUBMITTAL
MEETING FOR INITIAL LICENSE RENEWAL APPLICATION ON
SEPTEMBER 21, 2021 (EPID NO. L-2020-RNW-0029)

On September 21, 2021, the U.S. Nuclear Regulatory Commission staff met with Luminant Generation Company, LLC for a safety pre-application discussion regarding Luminant's future submittal of an initial license renewal application for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2. Enclosed is the meeting summary and the list of attendees.

If you have any questions or comments, please contact me via e-mail at Lois.James@nrc.gov.

Docket Nos.: 50-445 and 50-446

Enclosures:

1. Meeting Summary
2. List of Attendees

cc w/enclosure:

See next page

CONTACT: Lois M. James, NRR/DNRL
301-415-3306

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS NOS. 1 AND 2 -
MEETING SUMMARY FOR SAFETY PRE-SUBMITTAL MEETING FOR INITIAL
LICENSE RENEWAL APPLICATION ON SEPTEMBER 21, 2021
(EPID NO. L-2020-RNW-0029)

DATED: OCTOBER 5, 2021

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***via e-Concurrence**

OFFICE	PM: NRR/DNRL/NLRP	LA: NRR/DNRL/NRLB	BC: NRR/DNRL/NLRP
NAME	LJames	SGreen	LGibson
DATE	10/04/2021	10/04/2021	10/05/2021
OFFICE	PM: NRR/DNRL/NLRP		
NAME	LJames		
DATE	10/05/2021		

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U.S. Nuclear Regulatory Commission Public Meeting Summary

Title: Pre-Submittal Meeting for License Renewal Application for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 (CPNPP) – Safety

Date of Meeting: September 21, 2021, 2:00 pm – 4:00 pm

Location: Webinar

Type of Meeting: This is an Observation Meeting. This is a meeting in which attendees will have an opportunity to observe the U.S. Nuclear Regulatory Commission (NRC) performing its regulatory function or discussing regulatory issues. Attendees will have an opportunity to ask questions of the NRC staff or make comments about the issues discussed following the business portion of the meeting; however, the NRC is not actively soliciting comments toward regulatory decisions at this meeting.

Purpose of the Meeting(s): NRC will meet with Vistra Operations Company LLC (Vistra OpCo) and Luminant Generating Company (Luminant) to discuss the preparation of the safety portion of the initial license renewal application for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 (CPNPP)

General Details:

The NRC staff held a public, observational meeting with Vistra OpCo and Luminant to discuss the preparation of an initial license renewal application for CPNPP. The meeting began at 2:00 pm and ended at 3:30 pm. There were 28 NRC staff members, 17 applicant staff and contractor, and 19 members of the public. The meeting began with introductions of the NRC staff, Vistra OpCo staff, Luminant staff, and contractor support staff.

Summary of Meeting:

The NRC staff began their presentation by describing the license renewal process. There are two tracks – safety and environmental – that proceed in parallel. The environmental track includes a scoping period to receive comments on what should be included in the environmental impact statement; the staff review and audits; the development and issuance of a draft environmental impact statement; response to comments on the draft environmental impact statement; and issuance of a final environmental impact statement. The safety track includes staff reviews, audits, issuance of a safety evaluation report, and a review by the Advisory Committee on Reactor Safeguards (ACRS). The final environmental impact statement, the safety evaluation report, and the ACRS' recommendation to the Commission are inputs to the NRC regulatory decision regarding the license renewal application.

Next, the staff discussed a tentative schedule assuming that the CPNPP license renewal application was submitted on September 30, 2022.

Activity	Estimated Date
Application Submission Date	September 30, 2022
Acceptance Date (Project Start Date)	November 21, 2022
In-Office Technical Review Audit	December 2022

Activity	Estimated Date
On-Site Audit	January 2023
Breakout Audit	January/February 2023
Safety Evaluation Report	October 2023
ACRS Full Committee Meeting	December 2023
Licensing Decision	May 2024

The staff emphasized that the schedule was based on a generic review and would be adjust to account for the actual submittal date and the application submitted.

Luminant began by explaining the licensee/operator information. The operator of CPNPP is Vistra Operations Company LLC (Vistra OpCo), commonly denoted by Luminant. The owner of CPNPP is Comanche Peak Power Company LLC (CP Power Co).

Luminant continue by providing a history of major activities at CPNPP and describing the CPNPP facility. Then Luminant explained their approach for scoping and screening and aging management review.

Luminant explained that at this point in the development from the license renewal application, they have identified 44 aging management programs (AMPs) (37 existing and 7 new) with several having exceptions:

- XI.M2 Water Chemistry
- XI.M17 Flow-Accelerated Corrosion
- XI.M19 Steam Generators (SGs)
- XI.M21A Closed Treated Water Systems
- XI.M27 Fire Water System
- XI.M30 Fuel Oil Chemistry
- XI.M41 Buried and Underground Piping and Tanks
- XI.M42 Internal Coatings/Linings
- XI.S3 ASME Section XI, Subsection IWF

No plant specific AMPs have been identified at this time.

Luminant explained that CPNPP does have one unique material - fiberglass piping – and one unique exception - fuel oil storage tank – has extended the inspection frequency to 20 years.

Regarding time limited aging analysis (TLAA), Luminant does not anticipate any exemptions based on TLAAs. There will be three plant specific TLAAs:

- U2 SG tube corrosion allowance
- SG tube vibration wear projections
- Effect of radiation on containment coatings

Luminant also described their approach to the operating experience review. The initial review period will be from January 1, 2011 through December 31, 2020. The actual cutoff date for the operating experience review will be December 31, 2021. No new aging effects have been identified as a result of the operating experience review.

Luminant identified three topics that would be of interest to the NRC:

- Environmentally Assisted-Fatigue (EAF)
 - NUREG/CR-6260, “Application of NUREG/CR-5999 Interim Fatigue Curves to Selected Nuclear Power Plant Components,” sample set locations are being evaluated.
 - Performing EAF screening consistent with NUREG-1801, “Generic Aging Lessons Learned (GALL) Report,” Revision 2, AMP X.M1 to identify additional plant specific component locations that are more limiting than NUREG/CR-6260, “Testing of dc-Powered Actuators for Motor-Operated Valves locations.
 - Additional sentinel locations will be addressed prior to entering the period of extended operation.
- MRP-227, “Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines”
 - CPNPP is the first 60-year application post issuance of MRP-227 Rev 1-A and as supplemented by Interim Staff Guidance (ISG) SLR-ISG-2021-01-PWRVI.
- End of life Fluence vs Capsule Fluence

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- Both Comanche Peak units have already withdrawn and tested a surveillance capsule intended to bound 60-year operation
- Fluence values for these capsules are slightly below the peak 60-year reactor vessel fluence based on the latest projections

Public Participation Themes:

No member of the public spoke on the webinar.

Action Items/Next Steps:

The NRC staff will prepare and issue a meeting summary.

Attachments:

Meeting description and agenda – ADAMS Accession No. [ML21259A031](#)
NRC slide presentation – ADAMS Accession No. [ML21259A033](#)
CPNPP slide presentation – ADAMS Accession No. [ML21259A035](#)

**U.S. Nuclear Regulatory Commission Public Meeting – Attendees List
September 21, 2021**

Title: Pre-Submittal Meeting for License Renewal Application for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 (CPNPP) - Safety

Name	Affiliation
Brian Allik	U.S. Nuclear Regulatory Commission (NRC)/Office of Nuclear Reactor Regulation (NRR)
Lydiana Alvarado	NRC/NRR
Steve Bloom	NRC/NRR
Bob Caldwell	NRC/NRR
Tony Gardner	NRC/NRR
Lauren Gibson	NRC/NRR
Allen Hiser	NRC/NRR
Lois James	NRC/NRR
Andrew Johnson	NRC/NRR
Nageswara Karipineni	NRC/NRR
Paul Klein	NRC/NRR
Brian Lee	NRC/NRR
Bryce Lehman	NRC/NRR
Chang Li	NRC/NRR
Gregory Makar	NRC/NRR
Melissa McGuffie	NRC/NRR
James Medoff	NRC/NRR
Seung Min	NRC/NRR
Duc Nguyen	NRC/NRR
David Pratt	NRC/NRR
Adam Rau	NRC/NRR
Hector Rodriguez-Luccioni	NRC/NRR
Angelo Stubbs	NRC/NRR
Leslie Terry	NRC/NRR
Vaugh Thomas	NRC/NRR
Brian Wittick	NRC/NRR
Matthew Yoder	NRC/NRR
Carl Corbin	Luminant Generating Company (Luminant)
Todd Evans	Luminant
Ramiz Gilada	Luminant
Randy Harding	Luminant
Jack Hicks	Luminant
Amit Kalia	Luminant
Steven Sewell	Luminant
Taylor Smith	Luminant
Gary Adkins	Enercon

Stacy Burgess	Enercon
Burns Cunningham	Enercon
Zandra Garanzuay	Enercon
Mitch McFarland	Enercon
Brian Norman	Enercon
John Carlson	Westinghouse
Greg Imbrogno	Westinghouse
Thomas Zalewski	Westinghouse
Maria Delposen	Public
Mike Gallagher	Public
Jeff Gromatzky	Public
Dakota Huddleston	Public
Vivek A. Kannan	Public
Benjamin Mays	Public
L Smith (Guest)	Public
Garry G. Young	Public
Jane	Public
Veronica	Public
5 additional call ins	Public