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

Ref 10 CFR 50.55a

Subject: Comanche Peak Nuclear Power Plant (CPNPP)  
Docket Nos. 50-445 and 50-446  
ASME OM INSERVICE TEST PROGRAM RELIEF REQUEST SNB-3,  
SNUBBER INSERVICE PROGRAM THIRD INTERVAL EXTENSION

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(z)(2), Vistra Operations Company LLC ("Vistra OpCo") requests Nuclear Regulatory Commission (NRC) approval of proposed Relief Request SNB-3, Snubber Inservice Program, Third Interval Extension, from the requirements of American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) ISTA-3120, Inservice Test Interval (c)(2) and (d). The relief is to extend the end of the third interval for the Snubber Inservice Program from April 19, 2022 to August 3, 2023. The relief request is provided in Enclosure 1.

This communication contains no new commitments regarding CPNPP Units 1 and 2.

Should you have any questions, please contact Garry Struble at (254) 897-6628 or Garry.Struble@luminant.com.

Sincerely,

  
Steven K. Sewell

Enclosure: 1. IST Program Relief Request SNB-3

c (email) - Scott Morris, Region IV [Scott.Morris@nrc.gov]  
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## IST Program Relief Request SNB-3

**1. Title of Project**

RELIEF REQUEST SNB-3 - INSERVICE TESTING (IST) / SNUBBER INSERVICE PROGRAM

**2. Licensee**

Vistra Operations Company, LLC (Vistra OpCo)

**3. Licensee Contact**

Garry Struble

**4. Licensee Contact Phone Number**

254-897-6628

**5. Licensee Contact Email Address**

Garry.Struble@luminant.com

**6. Plant Identification Number**

227551

**7. Plant Name**

Comanche Peak Nuclear Power Plant (CPNPP)

**8. Plant Units**

Unit 1

Unit 2

**9. Docket Numbers**

50-445

50-446

**10. License Numbers**

NPF-87

NPF-89

**11. Requested Completion Date**

March 19, 2022

**12. Applicable Regulation and Inservice Inspection (ISI) or Inservice Testing (IST)**

Select 10 CFR 50.55a(z)(2) IST

**13. Proposed Alternative Number or Identifier:**

SNB-3

**14. Applicable American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, or ASME Operations and Maintenance (OM) Code, Edition and Addenda:**

The applicable Code for the CPNPP third ten-year inservice inspection (ISI) interval and the ISI program is the American Society of Mechanical Engineers (ASME) Section XI, 2007 Edition through the 2008 Addenda.

The applicable Code for the snubber program is ASME Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through the 2006 Addenda.

**15. ISI or IST Program Interval Number and start/end dates (as applicable):**

IST Program Third Interval

Start Date: August 3, 2013

End Date: August 3, 2023

Snubber Inservice Program Third Interval

Start Date: April 19, 2012

End Date: April 19, 2022

**16. ASME Code Class**

ASME Class 1, 2 & 3

**17. Applicable Components and or System Description (if applicable):**

All Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2 snubbers that are included in the scope of the Snubber Inservice Program.

**18. Describe the Applicable Code Requirements:**

ISTA-3120, Inservice Test Interval, states, in part:

- (a) The frequency for inservice testing shall be in accordance with the requirements of Section IST.
- (c) The inservice test intervals shall comply with the following, except as modified by ISTA-3120(d) ...
  - (2) *Successive Test Intervals:* 10 years following the previous test interval
- (d) Each of the inservice test intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals.

**19. Reason for Request:**

Pursuant to 10 CFR 50.55a, *Codes and standards*, paragraph (z)(2), Vistra OpCo is requesting authorization to extend the Snubber Inservice Program interval to align with the CPNPP Inservice Testing (IST) Program interval. The basis of this request is that compliance with ISTA-3120(c)(2) and (d) represents a hardship without a compensating increase in the level of quality or safety.

The CPNPP Snubber Inservice Program examinations and testing are currently performed in accordance with the ASME OM Code, 2004 Edition through the 2006 Addenda, as required by 10 CFR 50.55a(b)(3)(v), *OM condition: Snubbers ISTD (B) Snubbers Second provision*. This provision requires licensees to comply with the provisions for examining and testing snubbers in Subsection ISTD of the ASME OM Code when using the 2006 Addenda and later editions of ASME BPV Code Section XI. As required by RIS-2010-6 and EGM-10-001, the snubber program was transitioned from ASME Section XI to the ASME OM Code on April 19, 2012. Since this transition occurred separately from an ISI Program and IST Program interval, the Snubber Inservice Program interval was tracked separately as a stand-alone program.

Beginning with the fourth ten-year IST Program interval, Vistra OpCo is proposing to extend the ten-year

interval dates for the CPNPP Units 1 and 2 Snubber Inservice Program by approximately four months beyond the Code-allowed one-year extension, from April 19, 2022, to August 3, 2023. This extension allows the snubber program interval to be in alignment with the IST program fourth ten-year interval, which begins August 3, 2023. The applicable ASME OM Code Edition for the fourth 10-year IST interval will be the 2017 Edition (or later, as determined by the final 10 CFR 50.55a rulemaking effective within 18 months of the fourth interval start date).

The OM Code ISTA-3120(d) allows the inservice test interval to be extended by as much as 1 year. However, since the fourth IST interval start date is August 3, 2023, which is beyond the allowed 1-year extension for the snubber program, relief is requested to begin the fourth IST interval for snubbers on August 3, 2023. This will allow the snubber program interval to be aligned with the IST interval for pumps and valves. The existing snubber program will continue to verify the reliability of the snubber components. Since snubber testing is performed during refueling outages, there will be no changes or lapses in snubber testing activities as a result of extending the interval date to align with the IST Program interval update. Therefore, the existing snubber program, which is in accordance with the ASME OM Code, 2004 Edition through the 2006 Addenda, will remain in effect until the updated program is implemented on August 3, 2023.

**20. Brief Description of the Proposed Alternative (500 characters or less):**

Vista OpCo is requesting to align the ten year interval requirements of the OM Code, Section ISTD, “Snubbers” to the OM Code Sections ISTB and ISTC, “Pumps and valves”. Therefore, combining all OM Code IST programs into one interval.

**21. Full Description of the Proposed Alternative:**

Proposed Alternative

CPNPP is proposing to transition the snubber program for Units 1 and 2 to be in alignment with the IST program fourth ten-year interval beginning August 3, 2023. This will result in the Snubber Inservice Program still being implemented in accordance with the ASME OM Code 2004 Edition through the 2006 addenda, until the program is updated as part of the fourth interval IST Program update on August 3, 2023, at which time the applicable ASME OM Code Edition will be the 2017 Edition (or later, as determined by the final rulemaking for 10 CFR 50.55a published on or before February 3, 2022).

**22. If needed, include additional information for Question 21:**

NONE

**23. Description of the Basis for Use:**

Aligning the CPNPP Units 1 and 2 Snubber Inservice Program interval with the IST program interval will reduce any associated administrative burden and ensures that all IST Code programs (pumps, valves, dynamic restraints) remain in accordance with the same ASME OM Code year and addenda, eliminating any potential for differing governing Code Editions that might arise in subsequent ten-year intervals. Thus, this proposed alternative is requested pursuant to 10 CFR 50.55a(z)(2) on the basis that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety.

**24. If needed, include additional information for Question 23:**

NONE

**25. If requesting an alternative based on 10 CFR 50.55a(z)(2), describe hardship or unusual difficulty without compensating increase in the level of quality and safety associated with compliance with applicable code requirement. For requests under 10 CFR 50.55a(z)(1), leave this section blank.**

Aligning the CPNPP Units 1 and 2 Snubber Inservice Program interval with the IST program interval will reduce any associated administrative burden and ensures that all IST Code programs (pumps, valves, dynamic restraints) remain in accordance with the same ASME OM Code year and addenda, eliminating any potential for differing governing Code Editions that might arise in subsequent ten-year intervals. Thus, this proposed alternative is requested pursuant to 10 CFR 50.55a(z)(2) on the basis that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety.

**26. Proposed duration of the alternative:**

Upon approval, the proposed alternative extending the third ten-year interval for snubbers will be implemented at CPNPP Units 1 and 2 beginning April 19, 2022 and continuing through the start of the CPNPP Units 1 and 2 Fourth 10-Year IST Interval, August 3, 2023. The ten-year intervals for snubbers, thereafter, will continue to be synchronized with the corresponding IST interval.

**27. Include any additional information, as necessary:**

NONE

**28. Precedents (optional):**

Similar relief for aligning snubber programs with IST intervals was previously granted to Virginia Electric and Power Company, via safety evaluation, "North Anna Power Station, Unit No. 1 – Inservice Inspection Alternative Request N1-I4-CS-002 (EPID L-2018-LLR-0128), dated May 21, 2019 (ADAMS Accession No. ML19135A324).

**29. References:**

1. American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through the 2006 Addenda
2. 10CFR50.55a, Code and standards, June 3, 2020.

**30. Do you have attachments?**

NO