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CP-202200123  
TXX-22029  
March 29, 2022

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

Ref 10 CFR 50.90  
10 CFR 50.91(b)(1)

Subject: Comanche Peak Nuclear Power Plant (CPNPP)  
Docket Nos. 50-445 and 50-446  
LICENSE AMENDMENT REQUEST (LAR) 20-006 APPLICATION TO REVISE  
TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES,  
TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION  
TIMES - RITSTF INITIATIVE 4b" REQUEST FOR ADDITIONAL INFORMATION (RAI)

- Reference:
1. Letter TXX-21046 from Thomas P. McCool to the NRC, License Amendment Request (LAR) 20-006, APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b," dated May 11, 2021 (ADAMS Accession No. ML21131A233)
  2. Letter TXX-21093 from Thomas P. McCool to the NRC, Supplement to License Amendment Request (LAR) 20-006 APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b, dated July 13, 2021 (ADAMS Accession No. ML21194A078)
  3. Letter TXX-22002 from Thomas P. McCool to the NRC, Second Supplement to License Amendment Request (LAR) 20-006 APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b, dated February 17, 2022 (ADAMS Accession No. ML22048B490)
  4. E-mail dated March 23, 2022 to the Licensee (Vistra Operations Company LLC (Vistra OpCo)) from the Nuclear Regulatory Commission.

Dear Sir or Madam:

Pursuant to 10 CFR 50.90 and 10 CFR 50.91, Vistra Operations Company LLC (Vistra OpCo) is responding to a request for additional information for an amendment to the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2 Technical Specifications made by Reference 1, Reference 2, and Reference 3. The Request for Additional Information (RAI) is made by Reference 4.

Vistra OpCo requests adoption of Risk Informed Completion Times in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b", (ADAMS Accession No. ML18183A493).

This response includes a revised Enclosure 5, Table 1 and a revised Technical Specification, Section 5.5.23.e insert.

In accordance with 10 CFR 50.91(b)(1), a copy of the RAI response for the proposed license amendment is being forwarded to the State of Texas.

Vistra OpCo has determined that the documents revised by this additional information do not change the No Significant Hazards Consideration submitted in Reference 1.

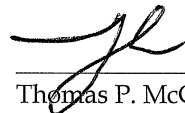
This communication contains no new commitments regarding CPNPP Units 1 and 2.

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

I state under penalty of perjury that the foregoing is true and correct.

Executed on March 29, 2022.

Sincerely,

  
\_\_\_\_\_  
Thomas P. McCool

Attachment: CPNPP Response to RAIs

c (email) - Scott Morris, Region IV [Scott.Morris@nrc.gov]  
Dennis Galvin, NRR [Dennis.Galvin@nrc.gov]  
John Ellegood, Senior Resident Inspector, CPNPP [John.Ellegood@nrc.gov]  
Neil Day, Resident Inspector, CPNPP [Neil.Day@nrc.gov]

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LICENSE AMENDMENT REQUEST (LAR) 20-006 APPLICATION TO REVISE  
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TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES  
– RITSTF INITIATIVE 4b" REQUEST FOR ADDITIONAL INFORMATION (RAI)

[Original submittal ADAMS Accession No. ML21131A233]  
[First supplemental ADAMS Accession No. ML21194A078]  
[Second supplement ADAMS Accession No. ML22048B490]

Comanche Peak Nuclear Power Plant (CPNPP) Response to  
Request for Additional Information (RAI)

The following items are provided in response to a Request for Additional Information (RAI) for the original and supplemental LAR submittals requested by e-mail dated March 23, 2022 to the Licensee (Vistra Operations Company LLC (Vistra OpCo)) from the Nuclear Regulatory Commission.

**APLC RAI-1**

*By letter dated February 17, 2022, the licensee supplemented its license amendment request to provide responses to audit questions. Audit Question 17 addressed whether seismic core damage frequency and large early release frequency (CDF/LERF) values used in the proposed Comanche Peak Risk-Informed Completion Time program were consistent with the guidelines in Nuclear Energy Institute (NEI) 06-09, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines, Industry Guidance Document," as approved by the NRC staff in NEI 06-09, Revision 0-A (ADAMS Accession No. ML071200238). In response to Audit Question 17, the licensee in part revised Enclosure 4, Table E4-1, "Seismic Results Summary for CPNPP" to provide updated seismic CDF/LERF values. However, corresponding information in Enclosure 5, Table 1, "CPNPP Units 1 and 2 Baseline PRA Model Results," was not updated. Specifically, Enclosure 5, Table 1 is not corrected for seismic CDF/LERF values and does not appear to be consistent with the Revised Table E4-1. Please confirm that the seismic CDF/LERF values in Enclosure 5, Table 1 should be identical to those in the revised Enclosure 4, Table E4-1 and correct Enclosure 5, Table 1. If it cannot be confirmed that the values in Enclosure 4, Table E4-1 and Enclosure 5, Table 1 are identical, please justify the basis and purpose of different values of seismic CDF/LERF used in the same application.*

### **CPNPP APLC RAI-1 - Response**

Comanche Peak Nuclear Power Plant (CPNPP) confirms that Enclosure 5, Table 1 seismic CDF/LERF values are the same as those provided in Enclosure 4, Table E4-1. Please see revised Enclosure 5, Table 1.

Table 1: CPNPP Units 1 and 2 Baseline PRA Model Results			
CPNPP Unit 1			
Baseline CDF		Baseline LERF	
Internal Events	1.10E-06	Internal Events	1.06E-07
Internal Flood	1.19E-07	Internal Flood	5.00E-09
Internal Fire	5.62E-05	Internal Fire	7.89E-06
Seismic <sup>(1)</sup>	1.93E-06	Seismic <sup>(1)</sup>	9.73E-07
High Winds <sup>(2)</sup>	4.09E-06	High Winds <sup>(2)</sup>	2.35E-07
Other External Events	No significant contribution	Other External Events	No significant contribution
<b>Total Unit 1 CDF</b>	<b>6.34E-05</b>	<b>Total Unit 1 LERF</b>	<b>9.21E-06</b>
CPNPP Unit 2			
Baseline CDF		Baseline LERF	
Internal Events	1.02E-06	Internal Events	1.02E-07
Internal Flood	1.39E-07	Internal Flood	5.88E-09
Internal Fire	4.29E-05	Internal Fire	5.69E-06
Seismic <sup>(1)</sup>	1.93E-06	Seismic <sup>(1)</sup>	9.73E-07
High Winds <sup>(2)</sup>	4.09E-06	High Winds <sup>(2)</sup>	2.35E-07
Other External Events	No significant contribution	Other External Events	No significant contribution
<b>Total Unit 2 CDF</b>	<b>4.98E-05</b>	<b>Total Unit 2 LERF</b>	<b>6.99E-06</b>
Notes:			
<ol style="list-style-type: none"> <li>Per Enclosure 4, the baseline seismic CDF and LERF are developed and are representative of a "penalty" factor.</li> <li>Per Enclosure 4, the baseline high winds CDF and LERF are developed and are representative of a "penalty" factor. The high winds penalty is procedurally adjusted based on the component(s) to which the RICT is applied.</li> </ol>			

## **STSB RAI-1**

*TSTF-505 Revision 2 proposes several administrative controls for the adoption of a Risk Informed Completion Time (RICT) Program at Technical Specification (TS) 5.5.[18] of the Standard TS markup. TSTF-505 Revision 2 TS 5.5.[18] Paragraph "e" contains administrative controls for methods to assess the risk from extending the limiting conditions for operation action statement completion times. TSTF-505 Revision 2 and the model safety evaluation (SE) have slightly different wording for Paragraph "e". TSTF-505 Revision 2 reads "...used to support this license amendment..." while the model SE uses the improved phrase, "...approved for use with this program..." In letter dated February 17, 2022, the licensee's response to Audit Question 26 affected Paragraph "e" of the proposed administrative controls for the Comanche Peak RICT Program at TS 5.5.23 by changing the phrase "this license amendment" to "this program." However, the proposed Paragraph "e" in the February 17, 2022, supplement is not consistent with the Paragraph "e" in either TSTF 505 Revision 2 or the model SE. Please revise Comanche Peak TS 5.5.23 Paragraph "e" to be consistent with the RICT program as discussed in the model SE for TSTF-505 Revision 2. Alternatively, provide justification for the variation provided in the supplement dated February 17, 2022.*

## **CPNPP STSB RAI-1 - Response**

Comanche Peak Nuclear Power Plant (CPNPP) confirms that the insert for TS 5.5.23.e is inconsistent with TSTF-505, Revision 2. Please see revised TS 5.5.23.e insert.

### **TS 5.5.23.e insert**

"The risk assessment approaches and methods shall be acceptable to the NRC. The plant PRA shall be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant, as specified in Regulatory Guide 1.200, Revision 2. Methods to assess the risk from extending the Completion Times must be PRA methods approved for use with this program, or other methods approved by the NRC for generic use; and any change in the PRA methods to assess risk that are outside these approval boundaries require prior NRC approval."