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CP-202300262  
TXX-23041  
June 20, 2023

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

Ref 10 CFR 54

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2  
DOCKET NUMBERS 50-445 AND 50-446  
FACILITY OPERATING LICENSE NUMBERS NPF-87 and NPF-89  
RESPONSE TO REQUEST FOR CONFIRMATION OF INFORMATION  
REGARDING REVIEW OF THE LICENSE RENEWAL APPLICATION – SET 2

REFERENCES:

1. Letter TXX-22077, from Steven K. Sewell to the NRC, submitting Comanche Peak Nuclear Power Plant License Renewal Application, October 3, 2022 (ADAMS Accession No. ML22276A082)
2. Letter TXX-23012, from Jay Lloyd to the NRC, submitting Comanche Peak Nuclear Power Plant License Renewal Application Revision 0, Supplement 1, April 6, 2023 (ADAMS Accession No. ML23096A302)
3. Letter TXX-23022, from Jay Lloyd to the NRC, submitting Comanche Peak Nuclear Power Plant License Renewal Application Revision 0, Supplement 2, April 24, 2023 (ADAMS Accession No. ML23114A377)
4. Electronic Communications, from M. Yoo (NRC) to K. Peters (Vistra), "Comanche Peak LRA – Request for Confirmation of Information – Set 2," May 25, 2023 (ADAMS Accession Nos. ML23145A232 and ML23145A233)

Dear Sir or Madam:

In Reference 1, as supplemented by References 2 and 3, Vistra Operations Company LLC (Vistra OpCo) submitted a license renewal application (LRA) for the Facility Operating Licenses for Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2. The NRC issued Requests for Confirmation (RCIs) to Vistra OpCo via Reference 4. Vistra OpCo hereby submits responses to these RCIs in the attachments to this letter.

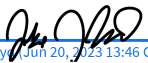
For ease of reference, the index of attachments topics is provided on page 3 of this letter.

Should you have any questions, please contact Todd Evans at (254) 897-8987 or [Todd.Evans@luminant.com](mailto:Todd.Evans@luminant.com).

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

Executed on June 20, 2023

Sincerely,

  
Jay Lloyd (Jun 20, 2023 13:46 CDT)

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Jay Lloyd

c: (email) w/o Attachments

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<b>Attachments Index</b>		
<b>Attachment No.</b>	<b>RCI Number</b>	<b>CPNPP LRA Confirmation of Information Topics</b>
A	RCI B.2.3.15-1	Fire Barrier Commodity Group – Summary of Aging Management Evaluation
B	RCI B.2.3.15-2	Fire Protection AMP
C	RCI B.2.3.15-3	Monitoring and Trending for the Fire Protection AMP

**LRA Section:** Table 3.5.2-15, “Fire Barrier Commodity Group – Summary of Aging Management Evaluation”

**NRC RCI No:** RCI-B.2.3.15-1

Table 3.5.2-15, “Fire Barrier Commodity Group – Summary of Aging Management Evaluation,” in the License Renewal Application (LRA) cites Aging Management Review (AMR) items 3.5-1, 095 (no aging effects or Aging Management Program (AMP)) and 089 (Boric Acid Corrosion AMP) for managing the galvanized steel damper housing commodity exposed to indoor uncontrolled air and air with borated water leakage, respectively.

During the audit of the Fire Protection AMP, the applicant stated that the Fire Protection AMP was not cited for managing the fire dampers because NUREG-1800, Revision 2, “Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants” (ML103490036), does not identify aging effects that require management for galvanized steel in indoor uncontrolled air. However, the U.S. Nuclear Regulatory Commission (NRC) staff notes that Revision 4 of Procedure No. MSM-P0-0705, “Fire Damper Inspection and Cleaning,” includes visual inspection of the fire damper surfaces for changes or degradation, which would ensure the damper housing continues to perform its intended fire barrier intended function during the period of extended operation (PEO).

Please confirm that the visual inspection of the fire damper surfaces for changes or degradation under Procedure No. MSM-P0-0705 will continue during the PEO.

**Luminant Response:**

Confirmed. Visual inspections of the fire damper surfaces for changes or degradation are performed in accordance with the NRC-approved CPNPP fire protection program, which remains in effect during the PEO.

**References:**

None.

**Associated LRA Revisions:**

No LRA changes have been identified as a result of this response.

**LRA Section:** B.2.3.15, "Fire Protection"

**NRC RCI No:** RCI-B.2.3.15-2

Section 6.1 of EPRI 3002013084, "Long-Term Operations: Subsequent License Renewal Aging Effects for Structures and Structural Components (Structural Tools)," dated November 2018, states, in part, "wire and other appurtenances used to secure fire wrap to the item being protected – is considered to be part of the fire wrap itself."

During the audit of the Fire Protection AMP, the applicant stated that radiant energy shields are secured to the raceway with stainless steel straps. In addition, the applicant stated that the stainless steel straps exposed to indoor uncontrolled air do not have aging effects consistent with NUREG-1800, Revision 2. However, the staff notes that Revision 3 of Procedure No. FIR-311, "Fire Rated Assembly Visual Inspection," states that exposed surfaces (top, bottom, sides, and ends) of radiant energy shields are visually inspected.

Please confirm that the stainless steel straps used to secure radiant energy shields to raceways are inspected as part of the visual inspection of the radiant energy shields exposed surfaces performed under Procedure No. FIR-311, and these inspections will continue during the PEO.

**Luminant Response:**

Confirmed. Stainless steel straps for radiant energy shields are part of the radiant energy shield assembly and are inspected as part of the assembly. Inspections of the radiant energy shield assemblies, including the wire and other appurtenances, are performed in accordance with the NRC-approved CPNPP fire protection program, which remains in effect during the PEO.

**References:**

None.

**Associated LRA Revisions:**

No LRA changes have been identified as a result of this response.

**LRA Section:** B.2.3.15, "Fire Protection"

**NRC RCI No:** RCI-B.2.3.15-3

The "Monitoring and Trending" program element for the Fire Protection AMP in Revision 2 of NUREG-1801, "Generic Aging Lessons Learned (GALL) Report" (ML103490041) states that the inspection results for penetration seals, fire barriers, and doors are trended for future actions and periodic tests of the halon fire suppression system provides data for trending.

During the audit of the Fire Protection AMP, the applicant stated that evaluation and trending by the Fire Protection Strategic Engineering Engineer is not limited to the halon system and noted that Revision 8 of Procedure No. STA-722, "Fire Protection Program," states that fire protection systems are evaluated and trended by the Fire Protection Strategic Engineering Engineer.

Please confirm, per Procedure No. STA-722, that the inspection results for penetration seals, fire barriers, doors, and the halon system are trended, and trending these inspection results will continue during the PEO.

**Luminant Response:**

Confirmed. The fire protection system, equipment, and components, including penetration seals, fire barriers, doors, and the halon system, are tested and inspected. The results of these tests and inspections are documented in the applicable work orders. Deficient conditions are documented in the corrective action database and are tracked and trended accordingly in accordance with the NRC-approved CPNPP Fire Protection Program, which remains in effect during the PEO.

**References:**

None.

**Associated LRA Revisions:**

No LRA changes have been identified as a result of this response.