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

Ref 10CFR2.201

Subject: Comanche Peak Nuclear Power Plant
Docket Nos. 50-445 and 50-446
Revision to Comanche Peak Nuclear Power Plant's Response to Notice of
Violation (NOV) 05000445/2021011-05

- References:
1. NRC Letter from Vincent Gaddy to Ken Peters dated May 6, 2021, "Comanche Peak Nuclear Power Plant, Units 1 And 2 - Design Basis Assurance Inspection (Teams) Inspection Report 05000445/2021011 And 05000446/2021011 And Notice Of Violation" (ADAMS Accession Number ML21124A130)
 2. Luminant Letter from Jay Lloyd to U.S. NRC dated May 25, 2023, "Comanche Peak Nuclear Power Plant (CPNPP) Docket Nos. 50-445 and 50-446 - Revision to Comanche Peak Nuclear Power Plant's Response to Notice of Violation (NOV) 05000445/2021011-05" (ADAMS Accession Number ML23145A291)

Dear Sir or Madam:

Pursuant to 10CFR2.201(a)(3), Vistra Operations Company LLC (Vistra OpCo) has created this letter to inform the NRC that the date when full compliance will be achieved has been extended, please see the revised commitment below for Comanche Peak Nuclear Power Plant Units 1 and 2:

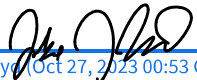
Commitment No.	Original Description	Revised Description
21-344702	In accordance with the CPNPP Corrective Action Program, a plant modification will be implemented to replace the required fuses and fuse holders, to ensure that the Class 1E inverters will continue to operate reliably when subjected to the effects of electrical faults that could be postulated to occur at non-Class loads, due to a lack of seismic qualification of the loads, during and after a design basis loss-of-offsite power and seismic event. This will be implemented by December 1, 2023.	In accordance with the CPNPP Corrective Action Program, a plant modification will be implemented to replace the required fuses and fuse holders, to ensure that the Class 1E inverters will continue to operate reliably when subjected to the effects of electrical faults that could be postulated to occur at non-Class loads, due to a lack of seismic qualification of the loads, during and after a design basis loss-of-offsite power and seismic event. This will be implemented by the end of the next refueling outage for Unit 2 (2RF21).

The evaluation was performed, and it was determined that a plant modification was necessary to restore CPNPP to compliance. The reason this extension is necessary is due to the need to perform these modifications during plant outages. Unit 1 has a refueling outage (1RF23) starting on October 15, 2023, and Unit 2 has a refueling outage (2RF21) starting on October 20, 2024.

The risk of extending this commitment is minimal due to the non-Class 1E (N1E) components fed from these panels being installed in safety related panels. The N1E components in these safety related panels do conform to seismic 2/1 requirement. With this configuration the failure of these N1E components during a seismic event is considered highly unlikely.

Should you have any questions, please contact Ryan Sexton at (979) 292-5064 or ryan.sexton@vistracorp.com.

Sincerely,


Jay Lloyd (Oct 27, 2023 00:53 CDT)

Jay Lloyd

Attachment: Revision to Response for Notice of Violation 05000445/2021011-05

c (email): John Monninger, Region IV [John.Monninger@nrc.gov]
Dennis Galvin, NRR [Dennis.Galvin@nrc.gov]
John Ellegood, Senior Resident Inspector, CPNPP [John.Ellegood@nrc.gov]
Dominic Antonangeli, Resident Inspector, CPNPP [Dominic.Antonangeli@nrc.gov]

Attachment 1
Revision to Response for Notice of Violation 05000445/2021011-05

NOTICE OF VIOLATION 05000445/2021011-05 SUMMARY

Title 10 CFR Part 50, Appendix B, Criterion III requires in part, that applicable regulatory requirements and design basis are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, from June 18, 2015, to March 25, 2021, the licensee did not assure that applicable regulatory requirements and design basis are correctly translated into specifications, drawings, procedures, and instructions. Specifically, the licensee failed to verify or check the adequacy of the design by performing an analysis or test that demonstrated that the Class 1E inverters would continue to operate reliably when subjected to the effects of electrical faults that could be postulated to occur at non-Class loads, due to a lack of seismic qualification of the loads, during and after a design basis loss-of-offsite power and seismic event.

RESPONSE TO NOTICE OF VIOLATION 05000445 / 2021011-05

1. Reason for the Violation

During the 2015 NRC Component Design Basis inspection at Comanche Peak Nuclear Power Plant (CPNPP), the inspectors identified that CPNPP failed to verify or check the adequacy of the design by performing an analysis or test that demonstrated the Class 1E inverters would continue to operate reliably when subjected to the effects of electrical faults that could be postulated to occur at non-class loads, due to a lack of seismic qualification of the loads, during and after a design basis loss of offsite power and seismic event. Condition Report (CR) 2015-005530 was issued to address this Finding. This violation occurred because CR 2015-005530 was not given a high enough priority for it to be completed in a timely manner.

2. Corrective Steps That Have Been Taken and the Results Achieved

An extent of condition review was completed. The affected UPS system panels with non-class 1E loads have been identified. An evaluation was performed for all identified non-class 1E loads (Calculation EE-1E-UPS-N1E-SC-EVAL). Fault clearing time for N1E circuits, not coordinated with acceptable loss of voltage time for their panels, are listed in the calculation. The calculation evaluates a replacement fuse for each circuit to provide coordination with acceptable loss of voltage time for their panel. A design change to replace these fuses, FDA-2022-000010-01, will ensure coordination of all N1E circuit load faults with acceptable loss of voltage time for their panel to provide uninterruptable power for safety related loads fed from the panels.

3. Corrective Steps That Will Be Taken

CPNPP will implement the design change FDA-2022-000010-01 by the end of the next Unit 2 Refueling Outage (2RF21).

4. Date When Full Compliance Will Be Achieved

Vistra OpCo will be in full compliance by the end of the next Unit 2 Refueling Outage (2RF21).