



Luminant

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CP-201101107
TXX-11099

Ref: 10CFR50.54(a)

August 10, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE
REQUEST FOR A CHANGE TO THE QUALITY ASSURANCE PLAN INVOLVING
A REDUCTION IN COMMITMENT

REFERENCES: 1. Letter logged TXX-11014, dated May 3, 2011, from Rafael Flores of Luminant Power to the NRC requesting a change to the Quality Assurance Plan.
2. Request for Additional Information from Balwant Singal, NRR, via e-mail dated July 11, 2011.

Dear Sir or Madam:

In reference 1 above, Luminant Generation Company LLC (Luminant Power) requested a change to the Quality Assurance (QA) Program, as provided in FSAR Chapter 17.

The proposed QA Program change revises FSAR section 17.2.15, "Nonconforming Material, Parts, or Components," and an associated commitment, to allow use of a conditional release to install a nonconforming item in the plant, and declare the affected component operable per Technical Specifications, provided that an evaluation of the nonconforming condition supports Technical Specification operability.

Reference 2 provided Luminant Power with a request for additional information from the Nuclear Regulatory Commission that is needed to review the QA Program change request. This letter provides the additional information requested in reference 2 in an attachment.

In accordance with 10CFR50.4(b)(7), a copy of this correspondence, with attachment, is being provided to the NRC Region IV Office and the CPNPP NRC Resident Inspectors.

This communication contains no new commitments.

Should have any questions regarding this submittal, please contact Tom Daskam at (254) 897-0348.

Q004

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


Executed on August 10, 2011.

Sincerely,

Luminant Generation Company, LLC

Rafael Flores

By:

A handwritten signature in black ink, appearing to read "Mitch Lucas", is written over a horizontal line.

Mitch Lucas
Site Vice President

Attachment - RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE
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c - E. E. Collins, Region IV
Balwant Singal, NRR
Resident Inspectors, CPNPP

ATTACHMENT to TXX-11099

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NRC Request for Additional Information:

Appendix B to Title of Code of Federal regulations (10 CFR), Part 50, Criterion 15, states in part, "measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation." Clarify how installing, testing and allowing for a nonconformity item to be declared operable based on Technical Specification operability satisfies the requirements of Appendix B to 10 CFR Part 50.

CPNPP Response:

The proposed change to the FSAR, section 17.2.15, "Nonconforming Materials, Parts, or Components," affects only subsection 5 on conditional releases, and does not alter the other 17.2.15 subsections, which address various measures for controlling nonconforming items, including: identification, tagging, segregation, documentation, re-inspection, testing, operability review, and disposition of the nonconformance, among others. The current FSAR, section 17.2.15, subsection 5, addresses conditional releases of nonconforming items, and this section contains some of the program controls to prevent inadvertent use or installation of nonconforming items. The proposed change to FSAR, section 17.2.15, subsection 5, as discussed further below, continues to provide adequate controls to prevent inadvertent use or installation of nonconforming items. CPNPP FSAR section 17.2.15 currently satisfies 10CFR50, Appendix B, Criterion 15, and the proposed FSAR section 17.2.15, if approved, will continue to satisfy this 10CFR50 requirement.

The proposed change to FSAR, section 17.2.15, subsection 5, would revise the current conditional release provision and allow for a conditional release of a nonconforming item from the warehouse for installation, testing, and operation, and allow taking Technical Specification credit for use of the nonconforming item, provided that: 1) resolution of the nonconforming condition is tracked in the Corrective Action Program, and 2) an Operability evaluation that meets the NRC Part 9900 Technical Guidance for assessing degraded or nonconforming conditions for potential impact on Operability is completed prior to taking Technical Specification credit for the nonconforming item. This change in the conditional release program allows Technical Specification credit to be taken for use of a nonconforming item, where the nonconformance does not adversely impact those characteristics required for SSC Operability.

With the additional requirement to complete a satisfactory Operability evaluation prior to taking Technical Specification credit for the nonconforming item, the proposed FSAR program for conditional release of nonconforming items is comparable to the current FSAR program requirements. The change will also provide additional plant operational flexibility, and may prevent unnecessary plant mode changes and shutdowns.