



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

July 27, 2015

LICENSEE: Luminant Generation Company LLC

FACILITY: Comanche Peak Nuclear Power Plant, Units 1 and 2

SUBJECT: SUMMARY OF JULY 9, 2015, PRE-APPLICATION PUBLIC MEETING WITH LUMINANT GENERATION COMPANY LLC TO DISCUSS THE PROPOSED LICENSE AMENDMENT REQUEST FOR TECHNICAL SPECIFICATION 3.8.1 CHANGES CONCERNING THE EMERGENCY DIESEL GENERATOR VOLTAGE AND FREQUENCY TOLERANCE BANDS (TAC NOS. MF6311 AND MF6312)

On July 9, 2015, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), and representatives of Luminant Generation Company LLC (Luminant, the licensee), at NRC Headquarters, Rockville, Maryland. The meeting notice and agenda, dated June 18, 2015, is located in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML15169A148. The purpose of the meeting was to discuss the proposed license amendment request (LAR) to change emergency diesel generator (EDG) voltage and frequency tolerance bands in various Technical Specification 3.8.1 surveillance requirements for Comanche Peak Nuclear Power Plant, Units 1 and 2 (CPNPP).

A list of meeting attendees is provided in Enclosure 1 to this meeting summary. The discussion was based on slides provided by Luminant; these slides can be found at ADAMS Accession No. ML15191A251.

Background

During NRC Component Design Basis Inspections (CDBIs) conducted in the past several years, questions were raised by the NRC staff whether the impacts of allowable tolerances in EDG frequency and voltage bands have been evaluated with respect to emergency core cooling system performance. The concerns are discussed in Inspection Reports 05000445/446-09-006 dated November 19, 2010, and 05000445/446-13-007 dated August 2, 2013 (ADAMS Accession Nos. ML103230122 and ML13214A346, respectively).

Concurrently, the NRC staff's concerns identified during the CPNPP CDBIs were acknowledged by the Pressurized Water Reactor Owners Group (PWROG) as generic, and the PWROG implemented a plan to resolve the issue for the fleet. The PWROG developed a methodology to address the concern, and submitted a guidance document, WCAP-17308-NP, *Treatment of Diesel Generator (DG) Technical Specification Frequency and Voltage Tolerances* (WCAP-17308), to the NRC staff on May 1, 2012 (ADAMS package Accession No. ML121280079), for review and endorsement. The staff is currently reviewing the WCAP-17308 and expects to issue a draft safety evaluation for public comment by November of 2015.

Purpose

The purpose of this meeting was for the licensee to:

- Provide the background and a summary of the LAR proposed changes.
- Describe the preliminary surveillance requirement changes and the methodology utilized.
- Describe the expected benefits and precedents.
- Provide a schedule for the submittal of the proposed LAR.

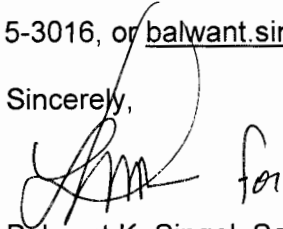
Results of Discussion

- The licensee discussed the information provided in the slideshow (ADAMS Accession No. ML15191A251). The licensee stressed that the information obtained from the Westinghouse analyses will ensure that the effect of variations in EDG steady state voltage and frequency will not impact safety equipment powered by the EDGs, and will thereby confirm that the equipment will continue to perform its intended safety functions. This information will be incorporated into the CPNPP design and licensing bases.
- The licensee stated that the current plan is to submit the LAR at the end of August 2015, but this may change. The licensee also stated that it will request a 120-day implementation timeframe.
- The NRC staff questioned whether the licensee was applying the information provided in NRC Administrative Letter (AL) 98-10, *Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety*, dated December 29, 1998 (ADAMS Accession No. ML031110108), as part of its evaluations. The licensee stated that it did not consider this to be an AL 98-10 issue due to plant-specific margins and conservatisms in the CPNPP pump curves.
- The NRC staff questioned whether the licensee planned to follow the generic methodology proposed in WCAP-17308. The licensee stated that it would be providing a plant-specific LAR since it preferred to take corrective action immediately and did not intend to wait for NRC staff endorsement of the WCAP. The licensee stated it was using a similar methodology, but would describe the methodology in detail rather than referring to WCAP-17308. The licensee stated that if the WCAP is approved prior to its LAR submittal, it would modify the LAR to reference the WCAP.
- The NRC staff raised concerns that not all sections of TS 3.8.1 that are impacted by the TS changes were included in the list of affected sections. Specifically, the NRC staff questioned if TS 3.8.1.9 was evaluated for impacts.

- The NRC staff suggested that the licensee leverage information available in docketed safety assessments and requests for additional information for other plants to ensure a complete and in-depth LAR for CPNPP.
- The licensee discussed the conservatism built into equipment performance curves, specifically pump curves, and the differences between an American Society of Mechanical Engineers Operation and Maintenance Code Inservice Test, and a comprehensive system verification.
- The NRC staff recommended that the licensee model system performance under severe conditions, such as EDG loading at pump runout conditions.
- The NRC staff questioned how the licensee would validate uncertainty bounds in the risk analysis. The licensee stated it would use accepted NRC methodologies.
- The licensee expressed interest in receiving more detailed information in a generic communication which would also benefit the entire industry. CPNPP staff stressed that this is a generic issue that it is addressing proactively.
- The licensee also expressed interest in receiving any information available on the limitations and conditions that the NRC staff intends to include in WCAP-17308 safety evaluation.
- Members of the public did not attend this meeting and no Public Meeting Feedback Forms were received.

Please direct any inquiries to me at (301) 415-3016, or balwant.singal@nrc.gov.

Sincerely,



Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

MEETING WITH LUMINANT GENERATION COMPANY LLC

REGARDING EMERGENCY DIESEL GENERATOR VOLTAGE AND FREQUENCY BANDS

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

JULY 9, 2015

| Name | Title | Organization |
|---------------|------------------------------|---|
| Lisa Regner | Project Manager | NRC/NRR |
| Pete Snyder | Engineer | NRC/NRR |
| Hari Kodali | Engineer | NRC/NRR |
| Bob Wolfgang | Engineer | NRC/NRR |
| Fanta Sacko | Engineer | NRC/NRR |
| Roy Mathew | Lead Engineer | NRC/NRR |
| Tim Hope | Manager, Regulatory Affairs | Luminant Generation Company LLC (Luminant) |
| Jonathan Bain | Instrumentation and Controls | Luminant |
| Rob Slough | Consulting Licensing Analyst | Luminant |
| Jim Andrachek | Luminant Consultant | Westinghouse |

Enclosure

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Sincerely,
/RA Lisa Regner for/
Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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| RidsNrrDssStsb Resource | JZimmerman, NRR/DE/EEEE | |

ADAMS Accession No. ML15191A228

*Via e-mail

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|--------|--------------------|---------------------|-----------------------|-----------------|
| NAME | LRegner | BSingal | JBurkhardt | RElliott |
| DATE | 7/10/15 | 7/22/15 | 7/10/15 | 7/24/15 |
| OFFICE | NRR/DE/EEEE/BC | NRR/DORL/LPL4-1/BC | NRR/DORL/LPL4-1/PM | |
| NAME | JZimmerman* | MMarkley | BSinga (LRegner for)l | |
| DATE | 7/27/15 | 7/27/15 | 7/27/15 | |

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