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CP-20160135
Log # TXX-16027

REF 10 CFR 2.202

February 24, 2016

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

SUBJECT: Comanche Peak Nuclear Power Plant Unit 1, Docket No. 50-445,
Sixth Six-Month Status Report in Response to March 12, 2012, Commission Order
Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond-
Design-Basis External Events (Order Number EA-12-049) (TAC NOS. MF0860 and
MF0861)

REFERENCES: 1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049,
Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for
Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide,"
Revision 0, dated August 2012
4. Luminant Generation Company LLC's Letter TXX-12158, Initial Status Report in
Response to March 12, 2012 Commission Order Modifying Licenses with Regard to
Requirements for Mitigation strategies for Beyond-Design-Basis External events
(Order Number EA-12-049), dated October 25, 2012
5. Luminant Generation Company LLC's Letter TXX-13030, Overall Integrated Plan in
Response to March 12, 2012 Commission Order Modifying Licenses with Regard to
Requirements for Mitigation strategies for Beyond-Design-Basis External events
(Order Number EA-12-049), dated February 28, 2013

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued an order
(Reference 1) to Luminant Generation Company LLC (Luminant Power). Reference 1 was
immediately effective and directs Luminant to develop, implement, and maintain guidance and
strategies to maintain or restore core cooling, containment, and spent fuel pool cooling
capabilities in the event of a beyond-design-basis external event. Specific requirements are
outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final
interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV,

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Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided Luminant Power's initial status report regarding mitigation strategies. Reference 5 provided Luminant Power's overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the sixth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the overall integrated plan was submitted (Reference 5), including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

If you have any questions regarding this report, please contact Carl B. Corbin at 254-897-0121 or carl.corbin@luminant.com.

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

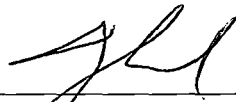
Executed on February 24, 2016.

Sincerely,

Luminant Generation Company LLC

Kenneth J. Peters

By:



Thomas P. McCool
Site Vice President (Acting)

Attachment: Comanche Peak Nuclear Power Plant's (CPNPP) Sixth Six Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

c - William M. Dean, Director, Office of Nuclear Reactor Regulation
Marc L. Dapas, Region IV
Jessica A. Kratchman, NRR/JLD/PMB
Balwant K. Singal, NRR
Stephen A. Monarque, NRR
Resident Inspectors, Comanche Peak Nuclear Power Plant

**Comanche Peak Nuclear Power Plant's (CPNPP) Sixth Six Month Status Report
for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

1 Introduction

Comanche Peak Nuclear Power Plant (CPNPP) developed an Overall Integrated Plan (Reference 1), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan and the First, Second, Third, Fourth, and Fifth Six Month Status Reports (References 3, 7, 11, 12 and 14), including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of February 12, 2016.

- FLEX Strategy Evaluation - Complete
- Modifications Evaluations - Complete
- Storage Design Engineering - Complete
- Procedures - PWROG issues NSSS-specific guidelines - Complete
- National Safer Response Center (NSRC) Operational - Complete
- Develop Training Plan - Complete
- Perform Phase 2 Staffing Study - Complete
- Develop Unit 2 Modifications - Complete
- Develop Site Response Plan with NSRC - Complete
- Walk-throughs/Demonstrations - Complete
- Unit 2 Implementation Outage - Complete
- Storage Implementation - Complete
- Procure On-Site Equipment for Unit 2 - Complete
- Issue FSGs - Complete
- Create Maintenance Procedures - Complete
- Implement Training - Complete

3 Milestone Schedule Status

The following table provides an update to Attachment 2 of the Overall Integrated Plan (OIP). It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. Note, italicized items in the following table were not provided as milestone items in Attachment 2 of the OIP. However, these items are added here for consistency with the 6 month status update template and will be carried forward in future 6 month status updates.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Complete	
Update 3	Aug 2014	Complete	
Update 4	Feb 2015	Complete	
Update 5	Aug 2015	Complete	
Update 6	Feb 2016	Complete	
<i>FLEX Strategy Evaluation</i>	<i>Aug 2013</i>	<i>Complete</i>	
<i>Walk-throughs or Demonstrations</i>	<i>Apr 2015</i>	<i>Complete</i>	<i>Nov 2015</i>
Perform Phase 2 Staffing Analysis	Jun 2014	Complete	Jun 2015
Modifications:			
<i>Modifications Evaluation</i>	<i>Aug 2013</i>	<i>Complete</i>	
Develop Unit 1 Modifications	Mar 2014	Started	Apr 2016
Unit 1 Implementation Outage (1RF18)	Oct 2014	Not Started	May 2016
Develop Unit 2 Modifications	Mar 2015	Complete	Jul 2015
Unit 2 Implementation Outage (2RF15)	Oct 2015	Complete	Nov 2015
Storage:			
<i>Storage Design Engineering</i>	<i>Mar 2014</i>	<i>Complete</i>	
<i>Storage Implementation</i>	<i>Feb 2015</i>	<i>Complete</i>	<i>Nov 2015</i>
FLEX Equipment:			
Procure On-Site Equipment (Unit 1/Unit 2)	Jul 2015	Started/Complete	May 2016/Nov 2015
Develop Site Response Plan with NSRC	Apr 2015	Complete	Aug 2015
<i>Install Off-Site Delivery Station (if Necessary)</i>	<i>Not Required</i>	<i>Not Required</i>	<i>Not Required</i>
National Safer Response Center Operational	Aug 2014	Complete	
Procedures:			
<i>PWROG issues NSSS-specific guidelines</i>	<i>May 2013</i>	<i>Complete</i>	
Issue FSGs	Aug 2014	Complete	Nov 2015
Create Maintenance Procedures	Jul 2014	Complete	Nov 2015
Training:			
<i>Develop Training Plan</i>	<i>May 2014</i>	<i>Complete</i>	<i>Dec 2014</i>
Implement Training	Apr 2015	Complete	Nov 2015
<i>Full Site FLEX Implementation</i>	<i>Oct 2015</i>	<i>Started</i>	<i>May 2016</i>
Submit Completion Report	Feb 2016	Started	Aug 2016

4 Changes to Compliance Method

There are no changes or clarifications to the compliance method beyond those identified in the First, Second, Third, Fourth and Fifth Six Month Status Reports (References 3, 7, 11, 12 and 14).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

In Reference 5, Luminant formally requested relief from the requirement of Section IV.A.2 of the Order (EA-12-049) regarding full implementation no later than two (2) refueling cycles after submittal of the Overall Integrated Plan. NRC approval of the requested relief was received in Reference 8, relaxing full order implementation for Comanche Peak Unit 1 until the completion of the spring 2016 refueling outage. Full order implementation for Comanche Peak Unit 2 is unchanged and occurred upon completion of the fall 2015 refueling outage (Reference 15). The milestone schedule in Section 3 has been updated for consistency with the approved schedule relief. No additional relief is requested herein.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following table provides a summary of the open items documented in the OIP and the status of each item.

Overall Integrated Plan Open Items	Status
OI1. Finalize location and protection requirements of FLEX storage buildings. The storage buildings will be designed in accordance with the NEI guidance and the applicable hazards.	Complete. FLEX equipment will be stored in a new single structure designed as described in Section 4 of Reference 7. Per Reference 13, the associated Confirmatory Item (CI 3.1.1.1.A) is closed. No further action required.
OI2. Perform containment evaluation based on the boundary conditions described in Section 2 of NEI 12-06. Based on the results of this evaluation, required actions to ensure maintenance of containment integrity and required instrument function will be developed as necessary.	Complete. The containment analysis concludes no significant heatup or pressurization of containment as a result of an ELAP when crediting SHIELD. Per Reference 13, the NRC has reviewed the containment analysis, found no discrepancies and closed the associated confirmatory items noted in Reference 4. No further action required.
OI3. Development of refueling equipment specifications, determination of fuel consumption rates, assessment of fuel supplies and determination of time frames for refueling of FLEX equipment in Phases 2 and 3 will be developed following generation of specifications for FLEX equipment.	Significant volumes of fuel are stored onsite in multiple redundant fuel oil storage tanks protected against all external hazards. Per Reference 13, NRC review has confirmed CPNPP has adequate protected fuel capacity. No further action required.
OI4. Finalize FLEX strategies and required modifications following resolution of low-leakage RCP seal performance issue.	Comanche Peak FLEX strategies credit the use of SHIELD low-leakage seals as approved in Reference 9. Preparation of design modifications for installation of SHIELD on Unit 1 during the spring 2016 refueling outage are in progress. SHIELD installation on Unit 2 occurred during the fall 2015 refueling outage.

Draft Safety Evaluation and Interim Staff Evaluation (ISE) are assumed synonymous. The following are additional Open Items documented in the Interim Staff Evaluation (Reference 4). These open items will be carried forward in future 6 month status updates until confirmation is received from the NRC that the items may be closed. Luminant Power is participating in the voluntary NRC audit process described in References 6 and 13.

Interim Staff Evaluation Open Items	Status
<p>3.2.1.2.A</p> <p>Regarding the RCP seals, the only O-ring of interest with the safe shutdown low-leakage (SHIELD) installed is the RCP seal sleeve to shaft O-ring. Qualification of the RCP seal sleeve to shaft O-ring will be tracked as part of the SHIELD redesign to confirm the delayed cooldown, as documented in the Integrated Plan, is acceptable. CPNPP will align with testing results to be documented in the forthcoming SHIELD white paper.</p>	<p>Reference 9 documents NRC acceptance of SHIELD for use in ELAP evaluations. Luminant has confirmed the reactor coolant system pressure and temperature limits of Reference 9 will be met during an ELAP event at Comanche Peak. However, per Reference 13, this item remains open pending NRC review of the reactor coolant pump O-ring material.</p>
<p>3.2.1.2.C</p> <p>If the RCP seals are changed to the newly designed Generation 3 SHIELD seals, or non-Westinghouse seals, the acceptability of the use of the newly designed Generation 3 SHIELD seals, or non-Westinghouse seals should be addressed, and the RCP seal leakages rates for use in the ELAP analysis should be provided with acceptable justification. During the audit process the licensee stated that CPNPP uses the Westinghouse model93A RCPs crediting SHIELD for FLEX strategies. Testing and qualification of SHIELD is ongoing and the licensee is closely following the re-design of SHIELD and will modify analyses and FLEX strategies if needed, based on the conclusions of the SHIELD white paper.</p>	<p>Reference 9 documents NRC acceptance of SHIELD for use in ELAP evaluations. Item 4 of the limitations and conditions from Reference 9 restricts the seal leakage rate to a constant 1.0 gallon per minute after SHIELD actuation. Any deviation from this restriction will be justified.</p>
<p>3.2.1.8.A</p> <p>The Pressurized Water Reactor Owners Group (PWROG) submitted to NRC a position paper, dated August 15, 2013 (ADAMS Accession No. ML 13235A 132, non-public, proprietary), which provides test data regarding boric acid mixing under single-phase natural circulation conditions and outlines applicability conditions intended to ensure that boric acid addition and mixing would occur under conditions similar to those for which boric acid mixing data is available. However, the NRC staff concluded that the August 15, 2013, position paper was not adequately justified and did not endorse this position paper. As such, ensuring adequate mixing of boric acid into the RCS under ELAP conditions is an open item for CPNPP.</p>	<p>Per Reference 10, the NRC has endorsed the PWROG position paper with restrictions. Luminant has evaluated the impact of these restrictions on the CPNPP FLEX boration strategy and confirmed k_{eff} will be maintained less than 0.99 throughout an ELAP event.</p>

7 Potential Draft Safety Evaluation Impacts

Any potential impact to the Interim Staff Evaluation has been previously discussed in Section 4 of this letter.

8 References

The following references support the updates to the OIP described in this attachment.

1. Comanche Peak Nuclear Power Plant Docket Nos. 50-445 and 50-446 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013.
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.
3. Comanche Peak Nuclear Power Plant, Docket Nos. 50-445 and 50-446, First Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond- Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0860 and MF0861), dated August 28, 2013.
4. NRC Interim Staff Evaluation, "Comanche Peak Nuclear Power Plant, Units 1 And 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF0860 and MF0861)," dated December 19, 2013.
5. Comanche Peak Nuclear Power Plant (CPNPP), Docket Nos. 50-445 and 50-446, Request for Schedule Relaxation for the March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond-Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0860 and MF0861), dated February 12, 2014.
6. NRC Letter from Jack R. Davis to All Operating Reactor Licensees and Holders of Construction Permits, "Nuclear Regulatory Commission Audits of Licensee Responses to Mitigation Strategies Order EA-12-049," August 28, 2013.
7. Comanche Peak Nuclear Power Plant, Docket Nos. 50-445 and 50-446, Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond- Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0860 and MF0861), dated February 27, 2014.
8. NRC Letter from Eric J. Leeds to Mr. Rafael Flores, "Comanche Peak Nuclear Power Plant, Unit 1 – Relaxation of Certain Schedule Requirements for Order EA-12-049 Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events," April 14, 2014.
9. NRC Letter from Jack Davis to Mr. James A. Gresham, ADAMS Accession No. ML14132A128, May 28, 2014.
10. NRC Letter from Jack Davis to Mr. Jack Stringfellow, ADAMS Accession No. ML13276A183, January 8, 2014.

11. Comanche Peak Nuclear Power Plant, Docket Nos. 50-445 and 50-446, Third Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond- Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0860 and MF0861), dated August 28, 2014.
12. Comanche Peak Nuclear Power Plant, Docket Nos. 50-445 and 50-446, Fourth Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond- Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0860 and MF0861),” dated February 26, 2015.
13. NRC Letter from Stephen Monarque to Mr. Rafael Flores, “Comanche Peak Nuclear Power Plant, Units 1 and 2 – Report for the Audit Regarding Implementation of Mitigating Strategies Related to Order EA-12-049 (TAC Nos. MF0860 and MF0861), dated August 5, 2015.
14. Comanche Peak Nuclear Power Plant, Docket Nos. 50-445 and 50-446, Fifth Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond- Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0860 and MF0861),” dated August 27, 2015.
15. Comanche Peak Nuclear Power Plant, Docket No. 50-446, Compliance with NRC Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond Design-Basis External Events (Order Number EA-12-049) (TAC NOS. MF0860 AND MF0861)dated November 18, 2015.