



Luminant

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December 14, 2016

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)
DOCKET NOS. 50-445 AND 50-446
REVISED COMPLETION DATE FOR THE COMANCHE PEAK MULTIPLE SPURIOUS
OPERATION CIRCUIT INTERACTIONS RESOLUTION IMPLEMENTATION PLAN

REFERENCE: Letter logged TXX-15049, dated April 7, 2015, "Revised Completion Date for the
Comanche Peak Multiple Spurious Operation Circuit Interactions Resolution
Implementation Plan," from Luminant Power to the NRC

Dear Sir or Madam:

Vistra Operations Company LLC (Vistra OpCo) is implementing its plan to resolve multiple spurious operations (MSOs) issues at Comanche Peak, as documented in the referenced letter. This plan integrated resolution of operator manual actions (OMAs) with modifications to Comanche Peak to resolve fire protection potential circuit interactions.

All of the design for the plant modifications for these resolutions have been engineered and completed. The various designs included addition of new operable components, fire barrier circuit protection, cable reroute/relocation, and circuit redesign to either preclude spurious operation or allow manual operation post fire.

All of these modifications have been installed and completed in the plant prior to the end of 2016 as previously committed in the referenced letter with the exception of fire barrier installation for the Unit 2 Train B Power Operated Relief Valve (PORV) circuitry. Two Kapton conductors were found to have damage to their protective coating when the cable tray cover was removed to support Thermo-Lag installation in Unit 2 Elevation 852' room 2-103. This was documented on Condition Report CR-2016-002892 and will be corrected in the next Unit 2 refueling outage scheduled for the spring of 2017.

These modifications made a substantial improvement in the plant response in the event of a fire. More components are directly operable from the control room. Reliance on operator manual actions in the immediate time following the initiation of a fire has been reduced. Unit differences in response to a fire have been removed. A substantial amount of components have had the control circuits hardened to

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decrease the amount of spuriously actuated components which will require action to mitigate or reposition. This will allow simplification of the actions to be taken in the event of a fire.

Follow on paperwork activities to update documentation and other records are ongoing. Revision of the Fire Safe Shutdown Analysis (FSSA) and update of Operations procedures will be completed in the fourth quarter of 2017.

This communication contains the following revised commitment which will be completed as noted:

<u>Number</u>	<u>Commitment</u>	<u>Due Date</u>
4510008	Luminant Power will complete the Comanche Peak OMA MSO Implementation Plan by the end of the Fourth Quarter of 2017.	12-31-2017

The Commitment number is used by Luminant Power for the internal tracking of CPNPP commitments.

If you have any questions regarding this submittal, please contact Jack C. Hicks at (254) 897-6725 or jack.hicks@luminant.com.

Sincerely,

Vistra Operations Company LLC



Thomas P. McCool
Site Vice President

c -

Kriss M. Kennedy, Region IV
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Resident Inspectors, Comanche Peak