



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

August 29, 2019

Ken J. Peters, Senior Vice President
and Chief Nuclear Officer
Attention: Regulatory Affairs
Vistra Operations Company LLC
P.O. Box 1002
Glen Rose, TX 76043

**SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 - RESPONSE
TO REQUEST TO CHANGE BIENNIAL REQUALIFICATION TRAINING CYCLE
START AND COMPLETION DATES**

Dear Mr. Peters:

In a letter dated July 31, 2019, from Mr. Brian F. St Louis, Plant Manager, to me, your station requested approval to change the start and completion dates of your 10 CFR 55.59 required licensed operator requalification training cycle. Specifically, your station requested to change the start date of your current requalification cycle retroactively to November 1, 2018, ending on October 31, 2020. Your station further requested to credit the annual and biennial NRC requalification exams administered between January and March 2019 to satisfy examination requirements, in part, for the proposed new cycle. The details of your request are included in an enclosure to this letter.

Title 10 CFR 55.59(c)(1) requires the following –

“(1) Schedule. The requalification program must be conducted for a continuous period not to exceed 2 years, and upon conclusion must be promptly followed, pursuant to a continuous schedule, by successive requalification programs.”

Title 10 CFR 55.59(a) requires that each licensee shall –

“(1) Successfully complete a requalification program developed by the facility licensee that has been approved by the Commission. This program shall be conducted for a continuous period not to exceed 24 months in duration.

(2) Pass a comprehensive requalification written examination and an annual operating test.”

Your station's previous licensed operator requalification training cycle ended on March 31, 2019, and was followed immediately by the start of your current training cycle, on April 1, 2019. If your current requalification cycle's start date were to be changed retroactively as requested, then the period from November 1, 2018, to March 31, 2019, would be credited simultaneously to both your previous and your current training cycles. It is the NRC's position that two training cycles cannot exist concurrently and satisfy the requirement that a

requalification program, "... upon conclusion must be promptly followed, pursuant to a continuous schedule, by successive requalification programs." Likewise, a single NRC-required requalification examination cannot satisfy two separate requalification cycles.

It is possible, per the regulations, for a requalification program to be less than 24 months long. NUREG 1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," states the following –

"Q. 333. Is there an intent to look at a 24-month period as an isolated section and try to meet certain requirements within a 24-month period?

A. The intent is that at the end of that period we want you to do a comprehensive evaluation of the program and decide how you need to modify it for the next cycle. If you want to do it in 12-month or 18-month cycles, that's also acceptable. If you want to tie it to refueling schedules that's also acceptable. The cycle cannot be longer than 24 months, however."

Therefore, it is possible that your station could elect to complete the current requalification cycle on October 31, 2020, as requested, so long as the requirement that each licensee shall pass a comprehensive requalification written examination and an annual operating test is met. Since a requalification program must be conducted in accordance with a facility licensee's accredited SAT-based training program, your station would need to evaluate the requirements of your own SAT-based program and determine if all such requirements could be satisfied in a compressed timeframe for one cycle.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Gregory E. Werner, Chief
Operations Branch
Division of Reactor Safety

Dockets: 50-445; 50-446
Licenses: NPF-87; NPF-89

Enclosure:
Letter from Brian F. St Louis to Greg Werner
dated July 31, 2019

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 - RESPONSE TO REQUEST
TO CHANGE BIENNIAL REQUALIFICATION TRAINING CYCLE START AND COMPLETION
DATES – AUGUST 29, 2019

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☒ SUNSI Review: ADAMS: ☐ Non-Publicly Available ☒ Non-Sensitive Keyword:
By: TJF ☒ Yes ☐ No ☒ Publicly Available ☐ Sensitive NRC-002

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CP-201900468
TXX-19077

U. S. Nuclear Regulatory Commission
Regional Administrator, Region IV
1600 East Lamar Boulevard
Arlington, Texas 76011-4511
ATTN: Mr. Greg Werner

Ref 10 CFR 55.59
NUREG-1021

7/31/2019

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
LICENSED OPERATOR BIENNIAL REQUALIFICATION TRAINING
CYCLE START AND COMPLETION DATE CHANGE REQUEST

Dear Mr. Werner:

Pursuant to 10CFR55.59, Requalification and NUREG-1021, Revision 11, Operator Licensing Examination Standards for Power Reactors, ES-605, C. License Maintenance; this correspondence is made to request a change to the start and completion dates for the 24-month continuous licensed operator requalification program at Comanche Peak Nuclear Power Plant (CPNPP).

The 24-month continuous licensed operator requalification program for CPNPP started on April 1, 2019 and will complete on March 31, 2021. In an effort to reduce the workload on the CPNPP exam group, that develops all regulatory exams, CPNPP is requesting NRC approval to adjust the 24-month continuous licensed operator requalification program. The request is to establish a revised 24-month continuous licensed operator requalification program starting on November 1, 2018 and completing on October 31, 2020.

This change credits the Annual Operating Exam administered in the first quarter of 2019. The next Annual Operating Exam will be administered starting on August 24, 2020 and completing on October 1, 2020. This schedule ensures the annual requirement for the Operating Exam is met.

This change credits the Biennial Written Exam administered in the 1st quarter of 2019. The next Biennial Written Exam will be administered starting on August 31, 2020 and completing on October 1st, 2020. This schedule ensures the 24-month requirement for the Biennial Written Exam is met.

Following this transition, the CPNPP 24-month continuous licensed operator requalification program will start on November 1 and complete on October 31 every 24 months.

Attachment 1 illustrates, in a calendar view the current and requested CPNPP 24-month continuous licensed operator requalification program.

CPNPP requests approval of this change by October 1, 2019 to be implemented within 30 days of approval notification. The requested approval date was administratively selected to allow for NRC review and timely implementation.

This communication contains no new commitments regarding CPNPP Units 1 and 2.

Should you have any questions, please contact Tom Morales at (254) 897-5305 or at Tom.Morales@luminant.com.

Sincerely,


Brian F. St Louis

Attachment: Current and Requested 24-month Cycle Calendar View

c - Scott Morris, Region IV
Natreon Jordan, NRR
Resident Inspectors, Comanche Peak

Attachment 1 to TXX-19077

Current 24-month Cycle:

2019											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 17-18			Cycle 19-20								
	Annual/Biennial		Outage								
2020											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 19-20											
	Annual		Outage							Outage	
2021											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 19-20			Cycle 21-22								
	Annual/Biennial								Outage		

Requested 24-month Cycle:

2019											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 19-20											
	Annual/Biennial		Outage								
2020											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 19-20										Cycle 21-22	
			Outage				Annual/Biennial		Outage		
2021											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 21-22											
						Annual			Outage		
2022											
JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
Cycle 21-22										Cycle 23-24	
			Outage					Annual/Biennial			