

# VISTRA ENERGY



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CP-201900396  
TXX-19068

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

Ref 10 CFR 50.46

8/14/2019

SUBJECT: Comanche Peak Nuclear Power Plant (CPNPP)  
Docket Nos. 50-445 and 50-446  
ECCS Reanalysis Schedule

REFERENCES: 1. Luminant Letter Logged TXX-18035 from Steven Sewell to NRC dated July 19, 2018, "ECCS RE-ANALYSIS SCHEDULE"  
2. Luminant Letter Logged TXX-15009 from Rafael Flores to NRC dated January 28, 2015, "ECCS RE- ANALYSIS SCHEDULE"

Dear Sir or Madam:

Via Reference 1 Vistra Operations Company LLC (Vistra OpCo) provided information relative to the ongoing re-analysis of a large break loss-of-coolant accident (LBLOCA) analysis which includes the effects of fuel thermal conductivity degradation, revised heat transfer multiplier distributions, changes to grid blockage ratio and porosity, and correct application of the burst strain. Reference 1 provided an update to the schedule provided via Reference 2. The schedules presented therein were based, in part, on the Nuclear Regulatory Commission (NRC) efforts to revise 10CFR50.46 for performance-based emergency core cooling systems (ECCS) cladding acceptance criteria (Federal Register Notice 79FR16106) and Westinghouse efforts for development of an ECCS code which would satisfy the proposed rulemaking.

After the Reference 1 submittal, Vistra OpCo initiated reanalysis of the so-called 'not-LOCA' accidents which utilize the revised Westinghouse Performance Analysis and Design Model (PAD5), updated to address thermal conductivity degradation. The 'not-LOCA' PAD5 effort is scheduled to be completed during the second quarter of 2021, after which a single License Amendment Request (LAR) will be made addressing both FSLOCA and non-LOCA considerations.

Accordingly, Commitment No. 4496966 is being revised to clarify submittal of both the 'not-LOCA'/PAD5 and FSLOCA/PAD5 results will be made to the NRC for review and approval during the third quarter of 2021.

ADD2  
NRR

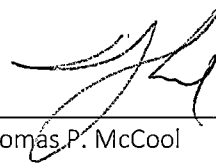
Commitment No.  
4496966

Commitment Description

Luminant power will submit to the NRC, for review and approval, a License Amendment Request (LAR) reflecting: (1) a Full-scope LOCA (FSLOCA) analysis which applies NRC-approved methods, and which will include the effects of fuel pellet thermal conductivity and, (2) a revised 'not-LOCA' analysis. Both the FSLOCA and 'not-LOCA' analyses utilize the updated Westinghouse PAD5 model. The LAR will be submitted in the third quarter of 2021.

Should you have any questions, please contact Ken Vehstedt at (254) 897-6296 or [ken.vehstedt@luminant.com](mailto:ken.vehstedt@luminant.com).

Sincerely,



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Thomas P. McCool

c - Scott A. Morris, Region IV (All Except Enclosure 1)  
Natreon Jordan, NRR (All Except Enclosure 1)  
Resident Inspectors, Comanche Peak (All Except Enclosure 1)