

VISTRA ENERGY



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

Ref 10 CFR 50.55a

October 30, 2019

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NO. 50-445
REQUEST TO DELAY THE CODE OF RECORD FOR THE UNIT 1 INSERVICE INSPECTION (ISI)
PROGRAM, RELIEF REQUEST NUMBER 1A4-1

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(z)(1), Vistra Operations Company LLC ("Vistra OpCo") hereby submits the attached Relief Request proposing to delay the code of record update for the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 Inservice Inspection (ISI) Program. The proposed alternative in Relief Request 1A4-1 is requested on the basis that the alternative provides an acceptable level of quality and safety.

This communication contains no new commitments regarding CPNPP Unit 1.

A047
NRR

Should you have any questions, please contact Jim Barnette at (254) 897-5866 or James.Barnette@luminant.com.

Sincerely,



Jack C. Hicks

Attachment - Comanche Peak Unit 1 Relief Request Number 1A4-1

c - Scott A. Morris, Region IV
Dennis Galvin, NRR
Resident Inspectors, Comanche Peak

Comanche Peak Unit 1
RELIEF REQUEST NUMBER 1A4-1

**Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(1)**

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

Comanche Peak Unit 1 ASME Class 1, 2, and 3 components and component supports.

2. Applicable Code Edition and Addenda

ASME Section XI, 2007 Edition through the 2008 Addenda, "Rules for Inservice Inspection of Nuclear Power Plant Components."

3. Applicable Requirement

The Code of Federal Regulations, Title 10, Part 50, Section 55a requires United States Nuclear plants to update their Inservice Inspection (ISI) Programs once every ten years. This requirement is mandated in paragraph (g)(4)(ii), which states in part:

Applicable ISI Code: Successive 120-month intervals. Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the ASME Code incorporated by reference in paragraph (a) of this section 12 months before the start of the 120-month inspection interval (or the optional ASME Code Cases listed in NRC Regulatory Guide 1.147, when using ASME BPV Code, Section XI, or NRC Regulatory Guide 1.192, when using the ASME OM Code, as incorporated by reference in paragraphs (a)(3)(ii) and (iii) of this section), subject to the conditions listed in paragraph (b) of this section."

4. Reason for Request

Comanche Peak Unit 1 (CPNPP-1) is currently completing the third 10-year ISI interval which concludes on August 12, 2020. The applicable Section XI Code of Record for the third ten-year interval is the 2007 Edition with the 2008 Addenda. Based on this interval end date of August 12, 2020, the applicable version of ASME Section XI for the fourth interval would be the 2013 Edition per 10CFR50.55a(a)(1)(ii)(C).

Comanche Peak Unit 2 (CPNPP-2) is currently in the third 10-year ISI interval which concludes on August 2, 2023. The applicable CPNPP-2 Section XI Code of Record for the third ten-year interval is also the 2007 Edition with the 2008 Addenda.

The three year difference in the CPNPP-1 and CPNPP-2 ISI Interval timelines creates a situation where the applicable Section XI Code of Record will be different for the last 36 months of the CPNPP-2 third interval. Having two separate ASME Section XI Code years implemented on a two-unit station can create procedural and programmatic differences that could potentially increase the likelihood of implementation errors.

Vistra Operations Company, LLC (Vistra OpCo) believes that having both units on the same Section XI Code of Record provides many implementation benefits which will maintain or enhance the existing level of quality and safety and provides cohesive programs for ISI, Repair/Replacements and Pressure Testing.

**Comanche Peak Unit 1
RELIEF REQUEST NUMBER 1A4-1**

5. Proposed Alternative and Basis for Use

Proposed Alternative

Vistra OpCo is proposing to utilize the current Section XI Code of Record, 2007 Edition with the 2008 Addenda, for CPNPP-1 and CPNPP-2 from August 13, 2020 to August 2, 2023. At the time of the required CPNPP-2 ISI Program update, the CPNPP-1 Program Plan will be revised to implement the updated CPNPP-2 Section XI Code of Record for the remainder of the CPNPP-1 fourth inspection interval, which is expected to include the second and third inspection periods in their entirety, approximately seven years.

Basis for Use

Vistra OpCo believes that having CPNPP-1 and CPNPP-2 on the same Section XI Code of Record provides many implementation benefits which will maintain or enhance the existing level of quality and safety and provides cohesive programs for ISI, Repair/Replacement and Pressure Testing. Conversely, having CPNPP-1 and CPNPP-2 on different Section XI Codes of Record can create procedural and programmatic differences that could potentially increase the likelihood of implementation errors.

6. Duration of Proposed Alternative

If approved, the proposed alternative will be implemented at CPNPP-1 from August 13, 2020 to August 2, 2023.

7. Precedents

The proposed alternative was previously approved for Comanche Peak Unit 1 for the third interval per NRC Letter from Michael T. Markley to Rafael Flores, dated April 28, 2010, TAC NO. ME 1703.

A similar proposed alternative was approved for McGuire Units 1 and 2 per NRC letter from Gloria Kulesa to Regis T. Repko dated March 3, 2011, TAC NO. ME4676.