

VISTRA ENERGY



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CP-201900674
TXX-19100

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

12/12/2019

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
OPEN PHASE CONDITION MONITORING

- REFERENCES: 1. CP-201800312 (TXX-18036), dated July 19, 2018, from Vistra Operations Company LLC, to NRC regarding Schedule Revisions related to Open Phase Condition Monitoring (ADAMS No. ML18218A169)
2. NEI 19-02, "GUIDANCE FOR ASSESSING OPEN PHASE CONDITION IMPLEMENTATION USING RISK INSIGHTS", (ADAMS No. ML19172A086)

Dear Sir or Madam:

The Reference 1 letter provided a revised schedule for full implementation of the Open Phase Detection/Protection system at Comanche Peak Nuclear Power Plant (CPNPP). At that time, the revised schedule date for transitioning the CPNPP Open Phase Detection / Protection system from monitoring-only to trip-enabled mode was changed from December 31, 2018, to December 31, 2019.

As noted in Reference 1, Vistra Operations Company LLC (Vistra OpCo) decided to operate the Open Phase Detection / Protection system in the monitoring mode through 2019 to ensure sufficient data is captured and analyzed prior to placement of the system into the 'trip' mode. Vistra OpCo has subsequently completed a risk assessment consistent with NEI-19-02 (Reference 2). The results of said analysis conclude a risk-informed decision to operate in the monitoring-only mode is supported.


Accordingly, CPNPP is updating the information provided in the Reference 1 letter to clarify CPNPP will henceforth be operating with the Open Phase Detection / Protection system in the monitoring-only mode and to reflect the fact the unavailability of the Open Phase Detection / Protection system would not require Limiting Condition for Operation (LCO) entry due to loss of the applicable offsite source.

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CPNPP operation with the Open Phase Detection / Protection system in the monitoring-only mode will not adversely impact the safe operation of CPNPP. Commitment 5839799 (previously AI-TR-2016-005840-40) is updated as described in Attachment 1.

Should you have any questions, please contact Ken Vehstedt at (254) 897-6296 or Ken.Vehstedt@luminant.com.

Sincerely,



Thomas P. McCool

Attachment 1 Regulatory Commitment

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

Regulatory Commitment

Commitment Number:

5839799 (previously AI-TR-2016-005840-40)

Commitment Description:

CPNPP operation with the Open Phase Detection / Protection system in the monitoring-only mode will be maintained and will not adversely impact safe plant operation. Interim actions documented in Reference 1 will be maintained.