VISTRA ENERGY

TXU energy | Luminant

Thomas P. McCool
Site Vice President
Luminant
P.O. Box 1002
6322 North FM 56
Glen Rose, TX 76043
o 254.897.6042

CP-202000016
TXX-20002

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

Ref 10 CFR 50.90
10 CFR 50.91(b)

01/16/2020

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
EDITORIAL CORRECTION TO LICENSE AMENDMENT REQUEST (LAR) 19-002
APPLICATION TO ADOPT TSTF-563, "REVISE INSTRUMENT TESTING DEFINITIONS TO INCORPORATE THE SURVEILLANCE FREQUENCY CONTROL PROGRAM"

Dear Sir or Madam:

Pursuant to 10CFR50.90, Vistra Operations Company LLC (Vistra OpCo) hereby requests an amendment to the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89) by incorporating the attached change into the CPNPP Units 1 and 2 Technical Specifications. This change request applies to both units.

Vistra OpCo is submitting an editorial correction to the license amendment request, LAR 19-002 submitted on November 7, 2019 under correspondence number TXX-19072. The numbering sequence for Technical Specification "Definitions," in Attachments 2 and 3 of TXX-19072 submittal (ADAMS NO. ML19325C595) were incorrect.

Attachment 1 provides the revised "Definitions" markup pages originally found in Attachment 2 of the November 7, 2019 submittal. Attachment 2 provides the revised "Definitions" clean pages originally found in Attachment 3 of the November 7, 2019 submittal.

In accordance with 10CFR50.91(b), Vistra OpCo is providing the State of Texas with a copy of this proposed amendment editorial correction.

The No Significant Hazards Consideration Analysis provided in Attachment 1 of TXX-19072 is not changed by the editorial corrections provided in Attachments 1 and 2 to this letter.

A001
NRR

This letter contains no new regulatory commitments.

If you have any questions regarding this submittal, please contact Garry W Struble at (254) 897-6628 or garry.struble@luminant.com.

I state under penalty of perjury that the foregoing is true and correct.

Executed on 01/16/2020.

Sincerely,

Thomas P. McCool

Attachments:
1. PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)
2. REVISED TECHNICAL SPECIFICATION CHANGES

c –

Scott Morris, Region IV
Dennis Galvin, NRR
Resident Inspectors, Comanche Peak

Mr. Robert Free
Environmental Monitoring & Emergency Response Manager
Texas Department of State Health Services
Mail Code 1986
P. O. Box 149347
Austin TX, 78714-9347

ATTACHMENT 1 to TXX-20002

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

1.0 USE AND APPLICATION

1.1 Definitions

---------- NOTE ----------
The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ACTUATION LOGIC TEST	An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state required for OPERABILITY of a logic circuit and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices.
AXIAL FLUX DIFFERENCE (AFD)	AFD shall be the difference in normalized flux signals between the top and bottom halves of an excore neutron detector.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

1.1 Definitions (continued)

CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY so that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. The determination of DOSE EQUIVALENT I-131 shall be performed using thyroid dose conversion factors from Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or from Table E-7 of Regulatory Guide 1.109, Revision 1, NRC, 1977, or from ICRP-30, 1979, Supplement to Part 1, page 192-212, Table titled "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity," or from Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."

1.1 Definitions (continued)

TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)	A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.

ATTACHMENT 2 to TXX-20002

REVISED TECHNICAL SPECIFICATION CHANGES

1.0 USE AND APPLICATION

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