



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

May 18, 2020

Mr. Ken 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 –
NOTIFICATION OF NRC DESIGN BASES ASSURANCE INSPECTION
(PROGRAMS) (05000445/2020010 AND 05000446/2020010) AND INITIAL
REQUEST FOR INFORMATION

Dear Mr. Peters:

On August 10, 2020, the U.S. Nuclear Regulatory Commission (NRC) will begin an onsite inspection at the Comanche Peak Nuclear Power Plant. A three-person team will perform this inspection using NRC Inspection Procedure 71111.21N.02, "Design Bases Inspection (Programs)," Attachment 2, "Design-Basis Capability of Power-Operated Valves Under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a Requirements."

This inspection will evaluate the reliability, functional capability, and design basis of risk-important power-operated valves as required by 10 CFR 50.55a and applicable 10 CFR Part 50, Appendix A and Appendix B, requirements, and as required by the Comanche Peak Nuclear Power Plant Operating License. Additionally, the team will perform an inspection of the documentation files to verify that the plant activities associated with safety-related motor-operated valves meet your commitments to Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," and GL 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves." In conducting this inspection, the team will select power-operated valves used to prevent and mitigate the consequences of a design basis accident.

The inspection will include an information gathering site visit by the team leader and 2 weeks of onsite inspection by the team. The inspection will consist of three NRC inspectors. The current inspection schedule is as follows:

Onsite Information Gathering Visit: July 28–29, 2020
Preparation Weeks: August 3–7, 2020, and August 17 - 21, 2020
Onsite Weeks: August 10–14, 2020, and August 24 - 28, 2020

The purpose of the information gathering visit is to meet with members of your staff to become familiar with the power-operated valve activities at the Comanche Peak Nuclear Power Plant. The lead inspector will request a meeting with your personnel to discuss the site power-operated valve procedures. Additionally, the lead inspector will request a discussion with your staff to become familiar with the regulations and standards applicable to power-operated valves at the site. Additional information and documentation needed to support the inspection will be identified during the inspection, including interviews with engineering managers and engineers.

In order to minimize the inspection impact on the site and to ensure a productive inspection, we have enclosed a request for information needed for the inspection. This information should be made available to the lead inspector during the July 28–29, 2020, visit. Since the inspection will be concentrated on safety-related and risk-significant power-operated valves, a list of such power-operated valves should be available to review during and following the information gathering visit to assist in our selection of appropriate power-operated valves to review.

It is requested that this information be provided to the lead inspector as the information is generated during the inspection. Additional requests by inspectors will be made during the onsite weeks for specific documents needed to complete the review of specific power-operated valves and associated activities. It is important that all of these documents are up-to-date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. In order to facilitate the inspection, we request that a contact individual be assigned to each inspector to ensure information requests, questions, and concerns are addressed in a timely manner.

The lead inspector for this inspection is Wayne C. Sifre. We understand that our licensing engineer contact for this inspection is Gary Murka. If there are any questions about the inspection or the requested materials, please contact the lead inspector by telephone at 817-200-1193 or by e-mail at Wayne.Sifre@nrc.gov.

Paperwork Reduction Act Statement

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: T6 A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

The burden to the public for these voluntary information collections is estimated to average 2,250 hours per examination, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection. You may submit comments on any aspect of the information collection, including suggestions for reducing the burden, to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by electronic mail to INFOCOLLECTS.RESOURCE@NRC.GOV; and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0018), Office of Management and Budget, Washington, DC 20503.

Public Protection Notification

The NRC may not conduct nor sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

This letter 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,

Vincent G. Gaddy

Vincent G. Gaddy, Chief
Engineering Branch 1
Division of Reactor Safety

Docket Nos. 05000445 and 05000446
License Nos. NPF-87 and NPF-89

Enclosure:
Design Bases Assurance Inspection
(Programs) Power-Operated Valve
Initial Request for Information
w/Attachment: Comanche Peak
Valves of Interest

cc w/ encl: Distribution via LISTSERV®

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF NRC
DESIGN BASES ASSURANCE INSPECTION (PROGRAMS) (05000445/2020010 AND
05000446/2020010) AND INITIAL REQUEST FOR INFORMATION – May 18, 2020

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**Initial Request for Information
Design Bases Assurance Inspection (Programs), Power-Operated Valves
COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2**

Inspection Report: 05000445/2020010 AND 05000446/2020010

Information Gathering Dates: July 28–29, 2020

Inspection Dates: August 10–14, 2020 and August 24–28, 2020

Inspection Procedure: IP 71111, Attachment 21N.02, “Design Bases Assurance Inspection (Programs)” Attachment 2, “Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements”

Lead Inspector: Wayne C. Sifre, Senior Reactor Inspector
Inspectors: Gerond George, Senior Reactor Inspector
Wes Cullum, Reactor Inspector

I. Information Requested for Information Gathering Visit (July 28, 2020)

The following information should be provided to the lead inspector in hard copy or electronic format to the attention of Wayne Sifre by July 20, 2020, to facilitate the reduction in the items to be selected for a final list of components. The inspection team will finalize the selected list during the prep week using the documents requested in this enclosure. The specific items selected from the lists shall be available and ready for review on the day indicated in this request. *Please provide requested documentation electronically in “pdf” files, Excel, or other searchable formats, if possible. The information should contain descriptive names and be indexed and hyperlinked to facilitate ease of use. Information in “lists” should contain enough information to be easily understood by someone who has knowledge of pressurized water reactor technology. If requested documents are large and only hard copy formats are available, please inform the inspectors and provide subject documentation during the first day of the onsite inspection.

1. Provide the valve characteristics for the valves listed in the attached list as described in Appendix C of NRC Inspection Procedure 71111.21N.02, “Design Bases Inspection (Programs),” Attachment 2, “Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements.”
2. List of power-operated valves (POVs) important to safety for the Comanche Peak Nuclear Power Plant. The list should include (a) component identification number; (b) applicable plant system; (c) American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Class; (d) safety-related or non-safety related classification; (e) valve type, size and manufacturer; and (f) actuator type, size, and manufacturer. If the NRC has granted a license amendment to categorize structures, systems, and component in accordance with 10 CFR 50.69, please provide the risk-informed safety category of the component.

Enclosure

3. Listing of the POVs sorted by risk importance, including external risk considerations.
4. Comanche Peak Nuclear Power Plant word-searchable updated final safety analysis report (UFSAR), License Conditions, Technical Specifications, and most recent Inservice Testing (IST) program plan. Specifically identify which UFSAR sections address environmental, seismic, and functional qualification of POVs.
5. NRC Safety Evaluation Report(s) associated with the Comanche Peak Nuclear Power Plant IST program and relief and alternative requests submitted in accordance with 10 CFR 50.55a for POVs.
6. Identify the edition of the ASME Operation and Maintenance of Nuclear Power Plants (OM Code) that is the Code of Record for the current 10-year IST Program interval, as well as any standards to which the Comanche Peak Nuclear Power Plant has committed with respect to POV capability and testing.
7. Comanche Peak Nuclear Power Plant Power Operated Valve Program Documents.
8. List of systems, system numbers/designators and corresponding names.
9. List of site contacts that will be associated with the inspection.

II. Discussions Requested

1. Interview with a Comanche Peak Nuclear Power Plant representative to discuss site POV capability analyses, including plant drawings and assumptions. This includes analysis for accident conditions.
2. Interview with a Comanche Peak Nuclear Power Plant representative to discuss POV maintenance elements as integrated into plant programs and procedures.
3. Interview with a Comanche Peak Nuclear Power Plant representative to discuss maintaining the design-basis capability of POVs if they have entered a period of extended operation, if applicable.

III. Information Requested for Inspection Preparation (August 3, 2020)

1. Documentation files, including test reports, for the electrical and mechanical components associated with the POVs selected by the lead inspector (10 specific valves will be identified and communicated to you prior to August 3, 2020).
2. References associated with the electrical and mechanical components document files.
3. Vendor manuals and technical sheets associated with the selected POVs.
4. Tours of the rooms in which the selected POVs are installed.

Inspector Contact Information:

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Senior Reactor Inspector
817-200-1193
Wayne.Sifre@nrc.gov

Gerond George
Senior Reactor Inspector
817-200- 1562
Gerond.George@nrc.gov

Wes Cullum
Reactor Inspector
817-200- 1563
Wes.Cullum@nrc.gov

Mailing Address:

U.S. NRC, Region IV
Attn: Wayne Sifre
1600 East Lamar Blvd.
Arlington, TX 76011-4

Comanche Peak Valves of Interest

<u>No.</u>	<u>ACT</u>	<u>Size (in)</u>	<u>Valve Type</u>	<u>System</u>	<u>Utility ID</u>	<u>Selection Basis</u>
1.	MOV	8	Gate	Unit 1 – AFW - AFW Pump Emergency Supply Flowpath	1-HV-2482	Risk
2.	MOV	8	Gate	Unit 1 - CVCS - ECCS Injection Flowpath & Boration	1-LCV-0112E	Risk
3.	AOV	10	Butterfly	Unit 1 – CCW - Flowpath Boundary	1-FV-4537	Risk
4.	AOV	3	Ball	Unit 1 – CCW - Safety Chilled Water Condenser Cooling	1-PV-4553	
5.	AOV	3	Diaphragm	Containment Isolation	1-LCV-1003	LERF
6.	AOV	18	Globe	Unit 1 - Feedwater Isolation	1-FCV-0540	
7.	HOV	18	Gate	Unit 1 - Feedwater Isolation & Containment Isolation	1-HV-2134	LERF
8.	AOV	3	Globe	Unit 1 – RCS - Post Accident Vent Path/Vent Path Isolation	1-PCV-0455A	Risk
9.	MOV	12	Gate	Unit 1 – RHR - Flowpath/Containment Isolation	1-8701B	Risk
10.	MOV	8	Gate	Unit 1 – SI - ECCS Recirculation Flowpath/Passive Pipe Break Isolation	1-8804B	Risk
11.	MOV	4	Gate	Unit 1 – SI - ECCS to Cold Legs Flowpath/ECCS to Hot Legs Flowpath	1-8835	Risk
12.	MOV	10	Gate	Unit 1 – SI - ECCS to Cold Legs Flowpath/ECCS to Hot Legs Flowpath	1-8809B	Risk
13.	MOV	10	Gate	Unit 1 – SI - ECCS to Hot Legs Flowpath/ECCS to Cold Legs	1-8840	Risk
14.	MOV	24	Butterfly	Unit 1 - Service Water Flowpath/Throttling	1-HV-4287	Risk
15.	MOV	4	Gate	Unit 2 - Containment Isolation & AFW to Faulted SG Flow	2-HV-2492B	Risk
16.	MOV	2	Globe	Unit 2 – CVCS - ECCS Flowpath Boundary	2-8110	Risk
17.	AOV	10	Butterfly	Unit 2 - CCW Flowpath Boundary	2-FV-4536	Risk
18.	MOV	18	Butterfly	Unit 2 – CCW - RHR Heat Exchanger Cooling Flowpath	2-HV-4572	Risk

<u>No.</u>	<u>ACT</u>	<u>Size (in)</u>	<u>Valve Type</u>	<u>System</u>	<u>Utility ID</u>	<u>Selection Basis</u>
19.	AOV	3	Ball	CCW - - Safety Chilled Water Condenser Cooling	2-PV-4552	Risk
20.	AOV	18	Globe	Feedwater Isolation	2-FCV-0520	Risk
21.	HOV	18	Gate	Feedwater Isolation & Containment Isolation	2-HV-2137	Risk
22.	HOV	2	Globe	Unit 2 – FW - Feedwater Isolation & Containment Isolation	2-HV-2137	Risk
23.	HOV	2	Globe	Unit 2 – MS - Steam Line Isolation & Containment Isolation	2-HV-2333A	Risk
24.	MOV	3	Gate	Unit 2 – RCS - Post Accident Vent Path/Vent Path Isolation	2-8000A	Risk
25.	MOV	6	Gate	Unit 2 – SI - ECCS Flowpath Boundary (during Recirculation)	2-8806	Risk
26.	MOV	14	Gate	Unit 2 – SI - ECCS Recirculation Flowpath/Containment Isolation	2-8811A	Risk
27,	MOV	10	Gate	Unit 2 – SI - ECCS to Cold Legs Flowpath/ECCS to Hot Legs Flowpath	2-8809A	Risk
28.	MOV	4	Gate	Unit 2 – SI - - ECCS to Hot Legs Flowpath/ECCS to Cold Legs	2-8802B	Risk
29.	MOV	6	Gate	Unit 2 – SI - Passive Pipe Break Isolation	2-8923B	Risk