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**Comanche Peak
Nuclear Power Plant
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CP-202000435
TXX-20069
August 6, 2020

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

Ref 10 CFR 50.55

Subject: Comanche Peak Nuclear Power Plant (CPNPP)
Docket Nos. 50-445 and 50-446
INSERVICE TEST (IST) PROGRAM REQUEST TO USE LATER CODE EDITION

Dear Sir or Madam:

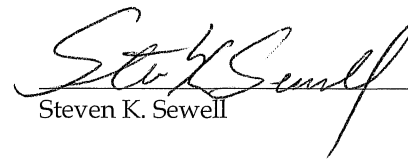
Pursuant to 10 CFR 50.55a(f)(4)(iv), "Applicable IST Code: Use of later Code editions and addenda", Vistra Operations Company LLC (Vistra OpCo) hereby requests Nuclear Regulatory Commission (NRC) approval to meet the requirements of ISTA-9230 in the ASME OM Code 2017 edition in lieu of the requirements of ISTA-9230 in the ASME OM Code 2004 edition through the 2006 addenda for the remainder of the current 120-month interval ending on August 2, 2023.

ASME OM-2017, Operation and Maintenance of Nuclear Power Plants, is the latest edition incorporated by reference in 10 CFR 50.55a(a)(1)(iv). Per 10 CFR 50.55a(b)(3), there are no OM conditions applicable to section ISTA-9230. Comparing the 2004 edition through the 2006 addenda to the 2017 edition, there have been no changes to IST Program requirements related to ISTA-9230 (ISTB-9300, ISTD-9120, or I-5200). Therefore, all related requirements will be met upon use of this later OM-2017 Code edition.

This communication contains no new commitments regarding CPNPP Units 1 and 2.

Should you have any questions, please contact Garry Struble at (254) 897-6628 or Garry.Struble@luminant.com.

Sincerely,



Steven K. Sewell

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