



**Steven K. Sewell**  
Senior Director,  
Engineering & Regulatory Affairs

**Comanche Peak  
Nuclear Power Plant  
(Vistra Operations  
Company LLC)**  
P.O. Box 1002  
6322 North FM 56  
Glen Rose, TX 76043

T 254.897.6113

CP-202000451  
TXX-20073  
August 19, 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

**Reference:** 1. Letter TXX-20069 from Steven K. Sewell to the NRC, INSERVICE TEST (IST)  
PROGRAM REQUEST TO USE LATER CODE EDITION (ML20219A520)

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.

ASME OM Code 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, ISTC-9120, or I-5200). There have been no changes to Snubber Program requirements related to ISTA-9230 (ISTD-1300 in the 2004 edition which is in ISTD-9300(a) in the 2017 edition). Therefore, all related requirements will be met upon use of this later ASME OM Code 2017 edition.

CPNPP Units 1 and 2 IST Programs are both in their third interval. The third interval for both IST Programs ends on August 2, 2023. CPNPP Units 1 and 2 Snubber Programs are both in their third interval. The third interval for both Snubber Programs ends on April 19, 2022.

Vistra OpCo requests ASME OM Code 2017, ISTA-9230 be applied to both Units 1 and 2, IST and Snubber Programs. Upon approval CPNPP will implement use of ASME OM Code 2017 as requested until the end of the current IST Program and Snubber Program intervals.

This correspondence supersedes the Reference 1 correspondence.

This correspondence supersedes letter TXX-20071 from Steven K. Sewell to the NRC submitted on August 19, 2020 due to incorrect date on the letter with submission ID# 31753.

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,

A handwritten signature in black ink, appearing to read "Steve Sewell", written over a horizontal line.

Steven K. Sewell

c (email) - Scott Morris, Region IV [Scott.Morris@nrc.gov]  
Dennis Galvin, NRR [Dennis.Galvin@nrc.gov]  
John Ellegood, Senior Resident Inspector, CPNPP [John.Ellegood@nrc.gov]  
Neil Day, Resident Inspector, CPNPP [Neil.Day@nrc.gov]