

**From:** Galvin, Dennis  
**Sent:** Monday, September 27, 2021 11:50 AM  
**To:** Struble, Garry  
**Cc:** Jack Hicks (Jack.Hicks@luminant.com); Carl Corbin (Carl.Corbin@luminant.com)  
**Subject:** Comanche Peak - Acceptance of Quality Assurance Program Change Request Regarding Internal Audit Frequency (EPID L-2021-LLQ-0003)

Dear Mr. Struble,

By letter dated August 24, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21236A291), Vistra Operations Company LLC (Vistra OpCo, the licensee) submitted a quality assurance program (QAP) change request for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 (Comanche Peak) in accordance with paragraph 50.54(a)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR). The proposed QAP change request would change the QAP as described in Chapter 17 of the Comanche Peak Final Safety Analysis Report.

Specifically, Vistra OpCo requested NRC approval to increase the internal audit interval for certain topics from 24 months to 36 months. Vistra OpCo has determined that the changes in these audit intervals are a reduction in commitments requiring prior NRC approval to implement pursuant to 10 CFR 50.54(a).

The purpose of this correspondence is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this QAP change request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed QAP change request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 110 hours to complete. The NRC staff expects to complete this review by September 27, 2022. Since the NRC staff has determined that a review of the proposed changes will take longer than 60 days, Vistra OpCo shall refrain from implementing the proposed changes until the NRC staff's review is completed. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-6256.

Respectfully,

Dennis Galvin, Project Manager  
Plant Licensing Branch 4  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445, 50-446

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**Recipients:**

"Jack Hicks (Jack.Hicks@luminant.com)" <Jack.Hicks@luminant.com>  
Tracking Status: None  
"Carl Corbin (Carl.Corbin@luminant.com)" <Carl.Corbin@luminant.com>  
Tracking Status: None  
"Struble, Garry" <Garry.Struble@luminant.com>  
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