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CP-202200273
TXX-22062
July 20, 2022

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

Ref 10 CFR 50.90
10 CFR 50.91(a)(6)
10 CFR 50.91(b)(1)

Subject: Comanche Peak Nuclear Power Plant (CPNPP)
Docket Nos. 50-445 and 50-446
Third Supplement to License Amendment Request (LAR) 20-006
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED
COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED
COMPLETION TIMES - RITSTF INITIATIVE 4b (Accession No. ML21131A233)"

Reference: 1. Letter TXX-21046 from Thomas P. McCool to the NRC, License Amendment Request (LAR) 20-006, APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b," dated May 11, 2021 (Accession No. ML21131A233)

2. Letter TXX-21093 from Thomas P. McCool to the NRC, Supplement to License Amendment Request (LAR) 20-006 APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b (Accession No. ML21194A078)"

3. Letter TXX-22002 from Thomas P. McCool to the NRC, Second Supplement to License Amendment Request (LAR) 20-006 APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT RISK INFORMED COMPLETION TIMES, TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b (Accession No. ML22048B490)"

Dear Sir or Madam:

Pursuant to 10 CFR 50.90 and 10 CFR 50.91, Vistra Operations Company LLC (Vistra OpCo) hereby submits a supplement to the license amendment request for the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 and Unit 2 Technical Specifications in connection with LAR 20-006, Revision to multiple specifications as requested in References 1 and 2. This third change supplement applies to both units.

This third supplement to the proposed amendment will modify Technical Specifications (TS) requirements for CPNPP to permit the use of Risk Informed Completion Times in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b",

(ADAMS Accession No. ML18183A493). A model safety evaluation was provided by the NRC to the TSTF on November 21, 2018 (ADAMS Accession No. ML18267A259). This supplement includes corrections to prior submittals.

This third supplement gives clarifying information regarding TS 3.3.2 ESFAS Instrumentation. Specifically, Condition L is changed to follow the format of other conditions within TS 3.3.2 and removes redundant and unnecessary information. This change is an acceptable variation from TSTF-505, Revision 2.

In accordance with 10 CFR 50.91(b)(1), a copy of this third supplement for the proposed license amendment is being forwarded to the State of Texas.

Vistra OpCo has determined that this supplement does not change the No Significant Hazards Consideration provided in the Enclosure submitted by Reference 1.

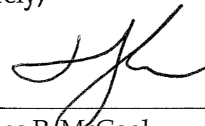
This communication contains no new commitments regarding CPNPP Units 1 and 2.

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

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

Executed on July 20, 2022.

Sincerely,



Thomas P. McCool

Attachment: Revised Proposed Technical Specification (TS) 3.3.2 pages (markup)
Enclosure: Technical Specification (TS) 3.3.2 Condition L variation from TSTF-505
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]
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ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
L. One or more required channel(s) inoperable. channels	L.1 Verify interlock is in required state for existing unit condition. OR L.2.1 Be in MODE 3. AND L.2.2 Be in MODE 4.	1 hour 7 hours 13 hours

INSERT TS 3.3.2
Conditions M, N, and
O

SURVEILLANCE REQUIREMENTS

-----NOTE-----

Refer to Table 3.3.2-1 to determine which SRs apply for each ESFAS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.2.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program.
SR 3.3.2.2	Perform ACTUATION LOGIC TEST.	In accordance with the Surveillance Frequency Control Program.
SR 3.3.2.3	Not Used.	

Enclosure to TXX-22062

Technical Specification (TS) 3.3.2 Condition L variation from TSTF-505

The Comanche Peak current TS 3.3.2 Condition L reads as follows;

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
L. One or more required channel(s) inoperable.	L.1 Verify interlock is in required state for existing unit condition.	1 hour
	<u>OR</u>	
	L.2.1 Be in MODE 3.	7 hours
	<u>AND</u>	
	L.2.2 Be in MODE 4.	13 hours

Comanche Peak has requested that TS 3.3.2 Condition L be as follows;

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
L. One or more channels inoperable.	L.1 Verify interlock is in required state for existing unit condition.	1 hour

Please see Attachment to TXX-22062 for a markup of the current Comanche Peak TS 3.3.2.

The requested variation from TSTF-505, Revision 2 allows alignment with other conditions in TS 3.3.2 that are changed by TSTF-505 and includes Condition L in default Condition N. This variation will aid the operators in application of Condition L as it will follow the same format as other conditions and utilizes default Condition N.

Deletion of "required" is supported by revision 5 to NUREG-1431, TS 3.3.2 in which Conditions B through Condition O do not use "required." So, removing "required" from Condition L will establish consistency across "Required Actions" in TS 3.3.2 and aid the operators when applying Condition L. This is an administrative change because the use of "required" is assumed in other Conditions within TS 3.3.2 and is redundant. Also removing the parentheses from the '(s)' at the end of the word 'channel' corrects an unnecessary grammatical difference with other conditions within TS 3.3.2.