

VISTRA ENERGY



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CP- 201800120
TXX- 18012

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

Ref 10CFR2.201

3/22/2018

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
REPLY TO A NOTICE OF VIOLATION

REFERENCE: 1. NRC letter to Ken Peters dated February 22, 2018, "Comanche Peak Nuclear Power Plant, Units 1 and 2 - NRC Problem Identification And Resolution Inspection Report 05000445/2017010 And 05000446/2017010 - And Notice Of Violation"

Dear Sir or Madam:

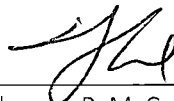
Pursuant to 10CFR2.201, Luminant Generation Company LLC (Luminant Power) hereby responds to the Notice of Violation that was transmitted via Reference 1. This communication contains no new commitments regarding CPNPP Units 1 and 2.

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NRR
RGN-TV*

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Should you have any questions, please contact Gary Merka at (254) 897-6613.

Sincerely,



Thomas P. McCool

Attachment

c - Kriss Kennedy, Region IV
Margaret Watford O'Banion, NRR
Balwant K. Singal, NRR
Resident Inspectors, Comanche Peak

NOTICE OF VIOLATION

During a NRC inspection conducted November 27 – December 14, 2017, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 50.71(e) requires, in part, that a licensee, "Shall update periodically the final safety analysis report, to assure that the information included in the report contains the latest information developed. The submittal shall include the effects of all changes made in the facility in support of conclusions that changes did not require a license amendment in accordance with 10 CFR 50.59 (c)(2)."

Contrary to the above, from October 28, 2016, to November 27, 2017, the licensee failed to update the final safety analysis report to assure that the information included in the report contains the latest information developed; and failed to include the effects of changes made to the facility that did not require a license amendment. Specifically, the licensee did not include the effects of changes to the K300 voltage relay setpoint or the safety evaluation in submittals to the Final Safety Analysis Report, Section 8.3.1.1.11, that supported the conclusion that the changes did not require a license amendment.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.1.d.3).

RESPONSE TO NOTICE OF VIOLATION

Luminant Power agrees with the violation and the requested information follows:

1. Reason for the Violation

During the 2016 NRC Plant Modifications and 10CFR50.59 inspection at CPNPP, the inspectors identified a Severity Level IV violation of 10 CFR 50.71(e) for failure to include the effects of changes to the K300 voltage relay setpoint in Final Safety Analysis Report (FSAR), Section 8.3.1.1.11. A Condition Report (CR) was issued to address this violation, and an activity was created in the CR to revise the FSAR. However, the CR owner incorrectly concluded that the FSAR was adequate as written and the CR was subsequently closed without revising the FSAR.

2. Corrective Steps That Have Been Taken and the Results Achieved

The owner of the 2016 CR that was created to address the original violation left CPNPP shortly after the CR was closed. Coaching was provided to other individuals that were involved in the review and closure of the 2016 CR. A Licensing Document Change Request has been approved in accordance with Procedure STA-116, "Maintenance of CPNPP Licensing Basis Documents, Operating License conditions and Technical Specifications," to revise FSAR Section 8.3.1.1.11 to include the effects of changes to the K300 voltage relay setpoint.

3. Corrective Steps That Will Be Taken

Per 10 CFR 50.71(e), a change to FSAR Section 8.3.1.1.11 has been approved to include the effects of changes to the K300 voltage relay setpoint and this change will be included in a future FSAR update.

4. Date When Full Compliance Will be Achieved

Luminant Power is currently in full compliance.