

VISTRA ENERGY



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CP-201800662
TXX-18066

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

Ref 10 CFR 50.90
10 CFR 50.91

10/31/2018

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445, 50-446 and 72-74
LICENSE AMENDMENT REQUEST 18-002 FOR REVISION OF THE EMERGENCY PLAN

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Vistra Operations Company LLC (Vistra OpCo) hereby requests an amendment to the Comanche Peak Nuclear Power Plant (CPNPP) Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89). This request proposes changes to the Emergency Plan for Comanche Peak Nuclear Power Plant (CPNPP) to revise staff augmentation times and reduce the number of required Emergency Response Organization (ERO) positions.

Attachment I provides an evaluation and justification for the proposed changes. Attachment II contains a summary of proposed changes to the Emergency Plan. Attachment III provides the analysis of all ERO positions being reduced/eliminated and evaluates the transfer of tasks to remaining ERO positions. Attachment IV provides a historical summary of staffing and augmentation response time changes. Attachment V provides Letters of Concurrence from Hood County, Somervell County and the State of Texas. Enclosure I contains the proposed mark-up of the Comanche Peak Nuclear Power Plant Emergency Plan Unit 1 and Unit 2. Enclosure II contains the proposed revised Emergency Plan (clean copy).

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92, "Issuance of amendment." The basis for this determination is included in Attachment I. Pursuant to 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," Section (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

AK45
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NR
NM55

The CPNPP Station Operations Review Committee has reviewed this amendment application. In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Vistra OpCo is providing the State of Texas with a copy of this proposed amendment.

Vistra OpCo requests approval of the proposed License Amendment by 11/30/2019, to be implemented within 180 days of the issuance of the license amendment. The extended implementation period is desired in order to complete update of implementing procedures, training on the revised procedures, and to allow due consideration of site refueling outage and training cycles.

This communication proposes the following regulatory commitment which will be completed as noted:

<u>Number</u>	<u>Commitment</u>	<u>Due Date</u>
5668227	Personnel assigned to offsite radiological monitoring Teams will be under the control of qualified senior Radiation Protection personnel at all times.	Within 180 Days of issue of License Amendment.

The commitment number is used by Vistra OpCo for the internal tracking of CPNPP regulatory commitments.

Should you have any questions, please contact Jim Barnette at (254) 897-5866 or James.Barnette@luminant.com.

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

Executed on October 31, 2018.

Sincerely,



Thomas P. McCool

Attachments:

- I Evaluation of Proposed Change
- II Emergency Plan Change Summary
- III ERO Position Matrix
- IV Summary of Shift Staffing and Augmentation Response Time Historical Requirements and Proposed Changes
- V Letters of Consultation and Concurrence from Off-site Response Organizations Acknowledgement of Opportunity to Review and Support CPNPP License Amendment Request

Enclosures:

- I Proposed Markup of Comanche Peak Nuclear Power Plant Emergency Plan
- II Revised Comanche Peak Nuclear Power Plant Emergency Plan

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

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