



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 26, 2015

Mr. Rafael Flores
Senior Vice President and Chief
Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 - PLAN
FOR THE ONSITE AUDIT REGARDING IMPLEMENTATION OF MITIGATING
STRATEGIES RELATED TO ORDER EA-12-049 (TAC NOS. MF0860 AND
MF0861)

Dear Mr. Flores:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design-Basis External Events" and Order EA-12-051, "Issuance of Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). The orders require, in part, that all holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review Overall Integrated Plans (OIPs), including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13071A617), Luminant Generation Company (Luminant, the licensee) submitted its OIP for Comanche Peak Nuclear Power Plant, Units 1 and 2 (CPNPP) in response to Order EA-12-049. By letters dated August 28, 2013, February 27, 2014, August 28, 2014, and February 26, 2015 (ADAMS Accession Nos. ML13252A077, ML14071A008, ML14254A402, and ML15069A219, respectively), Luminant submitted its first four six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit process led to the issuance of the CPNPP interim staff evaluation (ISE) on December 19, 2013 (ADAMS Accession No. ML13225A575), and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13071A344), Luminant submitted the OIP for CPNPP in response to Order EA-12-051. By letter dated June 7, 2013 (ADAMS Accession No. ML13141A626), the NRC staff issued a request for additional information (RAI). By letters dated July 3, 2013, August 28, 2013, February 27, 2014, and August 28, 2014 (ADAMS Accession Nos. ML13193A014, ML13252A078, ML14071A009, and ML14253A186, respectively), Luminant submitted its RAI response and first three six-month updates to the OIP. The NRC staff issued the CPNPP ISE and RAI on November 4, 2013 (ADAMS Accession No.

ML13295A674). Since Luminant informed the NRC staff on December 16, 2014 (ADAMS Accession No. ML15016A188) that it had achieved full compliance with the requirements of Order EA-12-051, the NRC staff will not perform an audit of the spent fuel pool instrumentation.

The ongoing audit process, to include the in-office and onsite portions, allows the NRC staff to assess whether it has enough information to make a safety evaluation of the OIPs. The audit allows the NRC staff to review open and confirmatory items from the mitigation strategies ISE, the licensee's integrated plans, and other audit questions. Additionally, the NRC staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns. The audit's onsite portion will occur prior to declarations of compliance for the first unit at each site.

This document outlines the on-site audit process that occurs after ISE issuance, as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents/Final Integrated Plans, and continue in-office audit communications with staff while proceeding towards compliance with the orders.

The NRC staff plans to conduct an onsite audit at CPNPP in accordance with the enclosed audit plan from April 27 – April 30, 2015.

If you have any questions, please contact me at 301-415-1544 or by e-mail at stephen.monarque@nrc.gov.

Sincerely,



Stephen Monarque, Project Manager
Orders Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket Nos.: 50-445 and 50-446

Enclosure:
Audit plan

cc w/encl: Distribution via Listserv

Audit Plan
Comanche Peak Nuclear Power Plant, Units 1 and 2

BACKGROUND AND AUDIT BASIS

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design-Basis External Events" and Order EA-12-051, "Issuance of Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). Order EA-12-049 directs licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool (SFP) cooling capabilities in the event of a beyond-design-basis external event (BDBEE). Order EA-12-051 requires, in part, that all operating reactor sites have a reliable means of remotely monitoring wide-range SFP levels to support effective prioritization of event mitigation and recovery actions in the event of a BDBEE. The orders require, in part, that all holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review, Overall Integrated Plans (OIPs), including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13071A617), Luminant Generation Company LLC (Luminant, the licensee) submitted its OIP for Comanche Peak Nuclear Power Plant, Units 1 and 2 (CPNPP) in response to Order EA-12-049. By letters dated August 28, 2013, February 27, 2014, August 28, 2014, and February 26, 2015 (ADAMS Accession Nos. ML13252A077, ML14071A008, ML14254A402, and ML15069A219, respectively), Luminant submitted its first four six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). The purpose of the NRC staff's audit is to determine the extent to which the licensees are proceeding on a path towards successful implementation of the actions needed to achieve full compliance with the order. This audit process led to the issuance of the CPNPP interim staff evaluation (ISE) on December 19, 2013 (ADAMS Accession No. ML13225A575), and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13071A344), Luminant submitted the OIP for CPNPP in response to Order EA-12-051. By letter dated June 7, 2013 (ADAMS Accession No. ML13141A626), the NRC staff issued a request for additional information (RAI). By letters dated July 3, 2013, August 28, 2013, February 27, 2014, and August 28, 2014 (ADAMS Accession Nos. ML13193A014, ML13252A078, ML14071A009, and ML14253A186, respectively), Luminant submitted its RAI response and first three six-month updates to the OIP. The NRC staff issued the CPNPP ISE and RAI on November 4, 2013 (ADAMS Accession No. ML13295A674). Since Luminant informed the NRC staff on December 16, 2014 (ADAMS Accession No. ML15016A188) that it had achieved full compliance with the requirements of Order EA-12-051, the NRC staff will not perform an audit of the spent fuel pool instrumentation.

Enclosure

The NRC staff will utilize the RAI process, as needed, to obtain additional information from Luminant in support of its review of CPNPP's OIP for EA-12-051. The ongoing audit process, to include the in-office and onsite portions, allows the NRC staff to assess whether it has enough information to make a safety evaluation of the OIPs. The audit allows the NRC staff to review open and confirmatory items from the mitigation strategies ISE, the licensee's OIPs, and other audit questions. Additionally, the NRC staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns.

This document outlines the on-site audit process that occurs after ISE issuance as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents (OPDs)/Final Integrated Plans (FIPs), and continue in-office audit communications with staff while proceeding towards compliance with the orders.

Following the licensee's declarations of order compliance, the NRC staff will evaluate the Integrated Plan, as supplemented, the resulting site-specific OPDs/FIPs, and, as appropriate, other licensee submittals based on the requirements in the orders. For Order EA-12-049, the NRC staff will make a safety determination regarding order compliance using the Nuclear Energy Institute (NEI) developed guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" issued in August, 2012 (ADAMS Accession No. ML12242A378), as endorsed, by NRC Japan Lessons-Learned Project Directorate (JLD) interim staff guidance (ISG) JLD-ISG-2012-01 "Compliance with Order EA-12-049, 'Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'" (ADAMS Accession No. ML12229A174). For Order EA-12-051, the NRC staff will make a safety determination regarding order compliance using the NEI developed guidance document NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12240A307), as endorsed, with exceptions and clarifications, by NRC ISG JLD-ISG-2012-03 "Compliance with Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12221A339). Should Luminant propose an alternative strategy or other method deviating from the guidance, additional staff review will be required to evaluate the alternative strategy in reference to the applicable order.

AUDIT SCOPE

As discussed, onsite audits will be performed per NRR Office Instruction LIC-111, "Regulatory Audits," to support the development of safety evaluations. Site-specific Integrated Plan and OPDs/FIPs rely on equipment and procedures that apply to all units at a site, therefore, audits will be planned to support the "first unit at each site." On-site audits for subsequent units at a site will be on an as-needed basis.

The purpose of the audits is to obtain and review information responsive to the CPNPP Integrated Plan, as supplemented, open and confirmatory items from the mitigation strategies ISE, and to observe and gain a better understanding of the basis for the site's overall programs to ensure the licensee is on the correct path for compliance with the Mitigation Strategies order. These may include, but are not limited to:

- Onsite review and discussion for the basis and approach for detailed analysis and calculations (Orders EA-12-049);
- Walk-throughs of strategies and laydown of equipment to assess feasibility, timing, and effectiveness of a given mitigating strategy or integration of several strategies (Order EA-12-049);
- Storage, protection, access, and deployment feasibility and practicality for onsite portable equipment (Order EA-12-049); and
- Evaluation of staging, access, and deployment of offsite resources to include Response Center provided equipment (Order EA-12-049).

NRC AUDIT TEAM

Title	Team Member
Lead Project Manager	Stephen Monarque
Technical Support	Garry Armstrong
Technical Support	Matthew McConnell
Technical Support	Josh Miller
Technical Support	Austin Roberts
Technical Support	Laura Okruhlik

LOGISTICS

The audit will be conducted onsite at CPNPP on April 27 - 30, 2015. Entrance and exit briefings will be held with Luminant at the beginning and end of the audit, respectively, as well as daily briefings of team activities. Additional details will be addressed over the phone. A more detailed schedule is provided below.

A private conference room is requested for NRC audit team use with access to audit documentation upon arrival and as needed.

DELIVERABLES

An audit report/summary will be issued to Luminant within 90 days from the end of the audit.

INFORMATION NEEDS

- Materials/documentation provided in responses to open or confirmatory items and RAIs in the CPNPP ISEs;
- OPD/FIP (current version), operator procedures, operator training plans, Response Center (SAFER) playbook; and
- Materials/documentation for staff audit questions.

To provide supplemental input to the ongoing audit of documents submitted to the NRC and made available via e-portal, the onsite audit will have three components: 1) a review of the overall mitigating strategies for the site, including, walk-throughs of strategies and equipment laydown of select portions; 2) a review of material relating to open or confirmatory items and RAIs from the ISEs, staff audit questions, and Luminant open items; and 3) additional specific issues requested by NRC technical reviewers related to preparation of a safety evaluation. Each part is described in more detail below.

Part 1 - Overall Mitigating Strategies and Program Review:

During the onsite audit, please be prepared to conduct a tabletop discussion of the site's integrated mitigating strategies program. This discussion should address the individual components of the plans, as well as the integrated implementation of the strategies including a timeline. The licensee team presenting this should include necessary representatives from site management, engineering, training, and operations that were responsible for program development, and will be responsible for training and execution.

Following the tabletop discussion please be prepared to conduct walk-throughs of procedures and demonstrations of equipment, as deemed necessary by NRC audit team members. Include representatives from engineering and operations that will be responsible for training and execution. At this time we expect, at a minimum, to walk-through the items below. Based on the tabletop presentations and audit activities, this list may change.

WALK-THROUGH LIST:

1. Walk-through a sample of strategies that will be delineated by specific NRC staff audit team members
2. Walk-through of portable (FLEX) diesel generator procedures, to include power supply pathways, areas where manual actions are required, and electrical isolation
3. Walk-through of building access procedures, to include any unique access control devices
4. Strategy walk-through of transfer routes from staging and storage areas to deployment locations for both onsite and offsite equipment
5. Strategy walk-through for core cooling and reactor coolant system (RCS) inventory, to include portable pumping equipment, flow paths, and water storage locations and the related reactor systems analysis and calculations
6. Walk-through of communications enhancements, described in Luminant's submittal dated October 31, 2012 (ADAMS Accession No. ML12318A100), as supplemented, by letter dated February 28, 2013 (ADAMS Accession No. ML13071A349), and the NRC staff's assessment for CPNNP, dated June 3, 2013 (ADAMS Accession No. ML13141A675).

Part 2 – Specific Technical Review Items:

During the visit, the following audit items will be addressed from the CPNPP ISE on Order EA-12-049: open items, confirmatory items, CPNPP audit question list and Luminant's OIP. Please provide documents or demonstrations, as needed, to respond to each item.

Part 3 – Specific Topics for Discussion:

1. Draft of CPNPP OPD/FIP
2. Training
3. Portable (FLEX) equipment maintenance and testing
4. RRC (SAFER) Response Plan for CPNPP

Proposed Schedule for Comanche Peak Nuclear Power Plant Audit

Onsite Day 1, Monday April 27, 2015

0800 Check in at site, Badging, and dosimetry

0930 Entrance meeting

0945 Luminant Presentation of Strategies

1230 Lunch

1330 NRC Audit Team Activities

- Technical area break-out discussions between NRC and Luminant staff in the areas of reactor systems, electrical, and balance of plant/structures.
- Review documents relating to open or confirmatory items, request for additional items, codes, analyses, etc.

1630 NRC Audit Team meeting

1700 Team Lead daily debrief with Luminant

Onsite Day 2, Tuesday, April 28, 2015

0800 Continue NRC Audit Team Activities:

- Review documents relating to open or confirmatory items, RAIs, codes, analyses, etc.
- Mitigating Strategies walk-throughs with Luminant

1200 Lunch

1300 Continue NRC Audit Team Activities

1630 NRC Audit Team meeting

1700 Team lead daily debrief with Luminant

Onsite Day 3, Wednesday, April 29, 2015

0800 Continue NRC Audit Team Activities

1200 Lunch

1300 Continue NRC Audit Team Activities

1630 NRC Audit Team meeting

1700 Team lead daily debrief with Luminant

Onsite Day 4, Thursday, April 30, 2015

0800 Continue NRC Audit Team Activities

1200 Lunch

1300 Continue NRC Audit Team Activities

1600 NRC/Luminant pre-exit meeting

1700 Audit closeout/departure

ML13295A674). Since Luminant informed the NRC staff on December 16, 2014 (ADAMS Accession No. ML15016A188) that it had achieved full compliance with the requirements of Order EA-12-051, the NRC staff will not perform an audit of the spent fuel pool instrumentation.

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If you have any questions, please contact me at 301-415-1544 or by e-mail at stephen.monarque@nrc.gov.

Sincerely,

/RA/

Stephen Monarque, Project Manager
Orders Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket Nos.: 50-445 and 50-446

Enclosure:
Audit plan
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DATE	03/19/15	03/18/15	03/23/15	03/25/15	03/26/15

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