



**Luminant**

**Rafael Flores**  
Senior Vice President  
& Chief Nuclear Officer  
rafael.flores@Luminant.com

**Luminant Power**  
P O Box 1002  
6322 North FM 56  
Glen Rose, TX 76043

**T** 254 897 5550  
**C** 817 559 0403  
**F** 254 897 6652

CP- 201001468  
TXX -10150

Ref. # 10CFR50.73(a)(2)(i)(B)

November 16, 2010

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT:** COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)  
DOCKET NO. 50-445 and 50-446  
INADEQUATE SURVEILLANCE TEST PROCEDURE  
RESULTING IN FAILURE TO MEET TS REQUIREMENTS  
LICENSEE EVENT REPORT 445/10-003-01, SUPPLEMENT 1

Dear Sir or Madam:

Enclosed is Supplement 01 to Licensee Event Report (LER) 445/10-003-00, " Inadequate Surveillance Test Procedure Resulting In Failure To Meet TS Requirements," for Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2.

This communication contains the following licensing basis commitments which will be completed or incorporated into the CPNPP licensing basis as noted:

<u>Number</u>	<u>Commitment</u>	<u>Due Date/Event</u>
4053750	Surveillance test procedures will be revised to verify isolation of the Control Room circuitry for those devices required for remote shutdown capability on transfer of controls to the Remote Shutdown Panel from the Control Room.	Prior to the next performance of SR 3.3.4.2 for each Unit

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

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

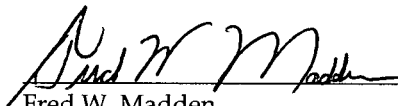
*JE22*  
*NIR*

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:

A handwritten signature in dark ink, appearing to read "Fred W. Madden", is written over a horizontal line.

Fred W. Madden

Director, Oversight & Regulatory Affairs

Enclosure

c - E. E. Collins, Region IV  
B. K. Singal, NRR  
Resident Inspectors, Comanche Peak

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of  
digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [infocollects@nrc.gov](mailto:infocollects@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

## 1. FACILITY NAME

Comanche Peak Nuclear Power Plant Unit 1

## 2. DOCKET NUMBER

05000 445

## 3. PAGE

1 OF 4

## 4. TITLE

Inadequate Surveillance Test Procedure Resulting in Failure to Meet TS Requirements

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCUMENT NUMBER
06	18	2010	2010	003	01	11	16	2010	CPNPP Unit 2	05000 446
									FACILITY NAME	DOCUMENT NUMBER
										05000

## 9. OPERATING MODE

1

## 11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

- |   |   |   |   |
|---|---|---|---|
| <input type="checkbox"/> 20.2201(b)         | <input type="checkbox"/> 20.2203(a)(3)(i)             | <input type="checkbox"/> 50.73(a)(2)(i)(C)  | <input type="checkbox"/> 50.73(a)(2)(vii)     |
| <input type="checkbox"/> 20.2201(d)         | <input type="checkbox"/> 20.2203(a)(3)(ii)            | <input type="checkbox"/> 50.73(a)(2)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) |
| <input type="checkbox"/> 20.2203(a)(1)      | <input type="checkbox"/> 20.2203(a)(4)                | <input type="checkbox"/> 50.73(a)(2)(ii)(B) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) |
| <input type="checkbox"/> 20.2203(a)(2)(i)   | <input type="checkbox"/> 50.36(c)(1)(i)(A)            | <input type="checkbox"/> 50.73(a)(2)(iii)   | <input type="checkbox"/> 50.73(a)(2)(ix)(A)   |
| <input type="checkbox"/> 20.2203(a)(2)(ii)  | <input type="checkbox"/> 50.36(c)(1)(ii)(A)           | <input type="checkbox"/> 50.73(a)(2)(iv)(A) | <input type="checkbox"/> 50.73(a)(2)(x)       |
| <input type="checkbox"/> 20.2203(a)(2)(iii) | <input type="checkbox"/> 50.36(c)(2)                  | <input type="checkbox"/> 50.73(a)(2)(v)(A)  | <input type="checkbox"/> 73.71(a)(4)          |
| <input type="checkbox"/> 20.2203(a)(2)(iv)  | <input type="checkbox"/> 50.46(a)(3)(ii)              | <input type="checkbox"/> 50.73(a)(2)(v)(B)  | <input type="checkbox"/> 73.71(a)(5)          |
| <input type="checkbox"/> 20.2203(a)(2)(v)   | <input type="checkbox"/> 50.73(a)(2)(i)(A)            | <input type="checkbox"/> 50.73(a)(2)(v)(C)  | <input type="checkbox"/> OTHER                |
| <input type="checkbox"/> 20.2203(a)(2)(vi)  | <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) | <input type="checkbox"/> 50.73(a)(2)(v)(D)  | <input type="checkbox"/> VOLUNTARY LER        |

## 10. POWER LEVEL

100

## 12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME

Timothy A. Hope, Nuclear Licensing Manager

TELEPHONE NUMBER (Include Area Code)

(254)897-6370

## 13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

## 14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO15. EXPECTED  
SUBMISSION  
DATE

MONTH DAY YEAR

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On June 18, 2010, during performance of the Component Design Bases Inspection, the NRC inspectors determined that surveillance test procedure (STP) OPT-216, "Remote Shutdown Operability Test" was not adequate to meet the Technical Specification (TS) Surveillance Requirement (SR). TS SR 3.0.3 was entered for the affected components and risk assessments were completed which supported continued operability until such time as the STP could be verified to adequately implement the testing requirements to meet the SR or the affected components could be adequately tested.

The cause of this event was due to a lack of clarity in the description for the basis for SR 3.3.4.2 in the CPNPP Technical Bases.

There have been no previous similar occurrences of failure to meet TS SRs due to inadequate STPs in the past three years.

All times in this report are approximate and Central Standard Time unless noted otherwise.

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

1. FACILITY NAME Comanche Peak Nuclear Power Plant Unit 1	2. DOCKET 05000 - 445	6. LER NUMBER			3. PAGE 2 OF 4
		YEAR 2010	SEQUENTIAL NUMBER 003	REV NO. 01	

**NARRATIVE** (If more space is required, use additional copies of NRC Form 366A) (17)

**I. DESCRIPTION OF THE REPORTABLE EVENT**

**A. REPORTABLE EVENT CLASSIFICATION**

10CFR50.73(a)(2)(i)(B) "Any operation or condition which was prohibited by the plant's Technical Specifications"

**B. PLANT CONDITION PRIOR TO EVENT**

On June 18, 2010, CPNPP Unit 1 and Unit 2 were both in Mode 1 operating at 100% power.

**C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT**

There were no inoperable structures, systems, or components that contributed to the event.

**D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES**

CPNPP TS SR 3.3.4.2 requires verification every 18 months that each required Hot Shutdown Panel power and control circuit and transfer switch is capable of performing the intended function. Contrary to this requirement, the existing surveillance test procedure (STP) was not adequate to verify that capability.

On June 18, 2010, during performance of the Component Design Bases Inspection, the NRC inspectors determined that surveillance test procedure (STP) OPT-216, "Remote Shutdown Operability Test" was not adequate to meet the Technical Specification (TS) Surveillance Requirement (SR). The STP provided a method to test the transfer of functional control from the Control Room (CR) to the Hot Shutdown Panel (HSP), but did not provide assurance that a circuit fault affecting control from the HSP would be identified. Engineering personnel (Utility, Non-Licensed) reported the condition to CR personnel (Utility, Licensed) and both units entered TS SR 3.0.3 for the affected components and risk assessments were completed which supported continued operability.

**E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL PERSONNEL ERROR**

On June 18, 2010, during performance of the Component Design Bases Inspection, the NRC inspectors determined that surveillance test procedure (STP) OPT-216, "Remote Shutdown Operability Test" was not adequate to meet the Technical Specification (TS) Surveillance Requirement (SR).

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

1. FACILITY NAME Comanche Peak Nuclear Power Plant Unit 1	2. DOCKET 05000 - 445	6. LER NUMBER			3. PAGE 3 OF 4
		YEAR	SEQUENTIAL NUMBER	REV NO.	
		2010	003	01	

**NARRATIVE** (If more space is required, use additional copies of NRC Form 366A) (17)

**II. COMPONENT OR SYSTEM FAILURES**

**A. CAUSE OF EACH COMPONENT OR SYSTEM FAILURE**

Not applicable - No component failures were identified during this event.

**B. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT**

Not applicable - No component failures were identified during this event.

**C. SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS**

Not applicable - No component failures were identified during this event.

**D. FAILED COMPONENT INFORMATION**

Not applicable - No component failures were identified during this event.

**III. ANALYSIS OF THE EVENT**

**A. SAFETY SYSTEM RESPONSES THAT OCCURRED**

Not applicable - No safety system responses occurred as a result of this event.

**B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY**

The current method provided in the STP to test the transfer of functional control from the Control Room (CR) to the Hot Shutdown Panel (HSP) has been utilized since the initial licensing of Unit 1 in 1990 and Unit 2 in 1993.

**C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT**

The existing surveillances verified functional transfer capability to assure the control function did transfer to the Hot Shutdown Panel (HSP) and that the control function from the Control Room (CR) was isolated to the extent that control was not functional from the Control Room (CR).

There were no safety system functional failures associated with this event.

Based on the above, it is concluded that this event did not adversely impact the safe operation of CPNPP or the health and safety of the public.

**IV. CAUSE OF THE EVENT**

The cause of this event was due to a lack of clarity in the description for the basis for SR 3.3.4.2 in the CPNPP Technical Bases.

**LICENSEE EVENT REPORT (LER)**  
**CONTINUATION SHEET**

1. FACILITY NAME Comanche Peak Nuclear Power Plant Unit 1	2. DOCKET 05000 - 445	6. LER NUMBER			3. PAGE 4 OF 4
		YEAR 2010	SEQUENTIAL NUMBER 003	REV NO. 01	

**NARRATIVE** (If more space is required, use additional copies of NRC Form 366A) (17)

**V. CORRECTIVE ACTIONS**

Engineering personnel reported the condition to CR personnel and both units entered TS SR 3.0.3 for the affected components. Risk assessments were completed within 24 hours which supported continued operability.

As part of the Corrective Action Program, the CPNPP Technical Specifications Bases for SR 3.3.4.2 will be reviewed and revised as appropriate.

Surveillance test procedures will be revised to verify isolation of the Control Room circuitry for those devices required for remote shutdown capability on transfer of controls to the Remote Shutdown Panel from the Control Room.

**VI. PREVIOUS SIMILAR EVENTS**

There have been no previous similar reportable events at CPNPP in the last three years.