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CP- 201400384 TXX -14045 Ref. # 10CFR50.73(a)(2)(i)(B)

April 3, 2014

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

SUBJECT:

COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)

DOCKET NO. 50-446

NON-COMPLIANCE WITH PRESSURE-TEMPERATURE LIMITS REPORT DURING

RCS VACUUM FILL

LICENSEE EVENT REPORT 445 / 14-002-00

Dear Sir or Madam:

Enclosed is Licensee Event Report (LER) 445/14-002-00, "Non-Compliance With Pressure-Temperature Limits Report During RCS Vacuum Fill," for Comanche Peak Nuclear Power Plant (CPNPP) Unit 1.

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

Should you have any questions, please contact R. A. Slough at (254) 897-5727.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

Fred W. Madden

Director, External Affais

Enclosure

c - Marc L. Dapas, Region IVB. K. Singal, NRRResident Inspectors, Comanche Peak

A member of the STARS Alliance

Callaway Comanche Peak Diablo Canyon Palo Verde Wolf Creek

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NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION APPROVED BY OMB NO. 3150 0104 EVRIBES 01/21/2017														
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All times in this report are approximate and Central Daylight Time unless noted otherwise.

NRC FORM 366 (02-2014) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104

EXPIRES:01/31/2017

LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET

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 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to 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.

6. LER NUMBER

3. PAGE

1. FACILITY NAME

Comanche Peak Nuclear Power Plant

Unit 1

2. DOCKET 05000 - 445 6. LER NUMBER

YEAR SEQUENTIAL REV
NUMBER NO.

2014 --002-- 00

2 OF 4

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

I. DESCRIPTION OF THE REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION:

During the past 3 years, a vacuum was drawn on the Unit 1 RCS during 1RF15 and 1RF16 using procedure SOP-101A, "Reactor Coolant System" and on the Unit 2 RCS during 2RF12 and 2RF13 using procedure SOP-101B, "Reactor Coolant System." LCO 3.4.3 requires the RCS pressure, temperature, and heatup and cooldown rates be maintained within the limits specified in the PTLR. The Applicability for LCO 3.4.3 is "At all times." The RCS heatup and cooldown limitations in the PTLR only specify a pressure to 0 psig.

Since the Applicability of TS 3.4.3 is "At all times," and the PTLR does not provide curves associated with a vacuum in the RCS, the plant was not operating in accordance with the TSs. Required Action C.1 requires initiating action to restore parameter(s) to within limits with a Completion Time of "Immediately." TS 1.3, "Completion Times," defines "Immediately" as "...pursued without delay and in a controlled manner." Action was not taken to restore parameter(s) immediately.

The events that occurred during 1RF15,1RF16, 2RF12, and 2RF13 are therefore reportable as an operation or condition prohibited by Technical Specifications pursuant to 10CFR50.73(a)(2)(i)(B).

B. PLANT CONDITION PRIOR TO EVENT:

At the time of discovery, both units were in Mode 1 (Power Operation) at 100 percent 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 structures, components or systems (SSC) that were inoperable at the start of the event and that contributed to the event.

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

On February 4, 2014, Luminant Power recognized Operating Experience at another station to be potentially applicable to Comanche Peak Nuclear Power Plant (CPNPP). An NRC inspection report described a failure to comply with reactor coolant system (RCS) Pressure/Temperature (P/T) Limits when RCS pressure decreases below 0 pounds per square inch gauge (PSIG). At the time of discovery, CPNPP's Pressure Temperature Limit Report (PTLR) only described pressures equal to or greater than 0 PSIG. However, since early 1996, CPNPP's analyses and procedures allowed drawing a vacuum during RCS refill following refuelings. Therefore, Luminant Power is conservatively reporting RCS pressure below 0 PSIG as a violation of Technical Specification 3.4.3 "RCS Pressure and Temperature (P/T) Limits."

The coordination of the change in RCS operating conditions was less than adequate, in that the associated affected documents were not revised as a result of failing to correctly identify the documents and/or involve all applicable parties, as well as the subtlety of the PTLR pressure value discrepancy. The apparent mental model by licensed operations personnel was not aligned with the literal applicability of the PTLR curves, in that the curves are applicable during RCS vacuum fill conditions, and not limited to only heat-up, cool-down, and inservice leak/hydrostatic testing conditions. Luminant Power interpreted the PTLR to only apply to RCS pressure conditions above atmospheric pressure, and therefore did not consider it in conflict with the adoption of the vacuum refill analysis and procedure. Corrective actions included revising the PTLR to specify negative 14.7 pounds per square inch gage (PSIG) as the lower limit. The explicit PTLR compliance error during vacuum refill did not adversely affect the health and safety of the public or station personnel.

NRC FORM 366 (02-2014) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104

EXPIRES:01/31/2017

LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET

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 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to 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	2. DOCKET	6. LER NUMBER			3. PAGE
Comanche Peak Nuclear Power Plant	05000 - 445	YEAR	SEQUENTIAL NUMBER	REV NO.	
Unit 1		2014	002	00	3 OF 4

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

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

In accordance with procedure STA-426, "Industry Operating Experience Program" Luminant Power personnel screen various industry operating experience (OE) sources. This event was identified as a result of an informal review of NRC inspection reports by the NSSS Systems Manager. The NSSS Systems Manager recognized the generic implications of a unique violation in NRC Inspection Report 05000440/2013007 dated January 3, 2014, and created Condition Report CR-2014-000960.

During the last three years, RCS pressure was reduced below 0 PSIG during the vacuum refill process in CPNPP Units 1 and 2. Specifically, RCS pressure was reduced below 0 PSIG during 2RF12, 1RF15, 2RF13, and 1RF16.

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

Not applicable

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

The design change implementing vacuum refill evaluated the physical effects of the sub-atmospheric RCS pressure to not adversely impact the reactor vessel and Reactor Coolant Pressure Boundary (RCPB) structural integrity. Vacuum refill was implemented under 10 CFR 50.59, which relied upon Westinghouse WCAP-14040. The NRC Safety Evaluations are contained in Revision 2 and Revision 4 of the topical report approving them as acceptable P/T limits development methodologies.

NRC FORM 366A (02-2014) PRINTED ON RECYCLED PAPER

NRC FORM 366 (02-2014) U.S. NUCLEAR REGULATORY COMMISSION

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1. FACILITY NAME	2. DOCKET		6. LER NUMBER	3. PAGE	
Comanche Peak Nuclear Power Plant	05000 - 445	YEAR	SEQUENTIAL NUMBER	REV NO.	
Unit 1	03000 - 443	2014	002	00	4 OF 4

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

CPNPP Operating Procedures SOP-101A, "Reactor Coolant System", for Unit 1, and SOP-101B, "Reactor Coolant System", for Unit 2, ensure sufficient RCS pressure to assure adequate net positive suction head (NPSH) for the RHR system, over an operating band of temperatures, pressures, and RHR flows.

Therefore, the explicit PTLR compliance error during vacuum refill did not adversely affect the health and safety of the public or station personnel.

IV. CAUSE OF THE EVENT

The coordination of change in RCS operating conditions was less than adequate, in that the associated affected documents were not revised as a result of failing to correctly identify the documents and/or involve all applicable parties, as well as the subtlety of the PTLR pressure value discrepancy. Luminant Power interpreted the PTLR to only apply to RCS pressure conditions above atmospheric pressure, and therefore did not consider it in conflict with the adoption of the vacuum refill analysis and procedure.

V. CORRECTIVE ACTIONS

On April 1, 2014, the Comanche Peak Nuclear Power Plant Pressure and Temperature Limits Report, Revision 3 became effective, which includes figures showing acceptable operation down to -14.7 PSIG.

VI. PREVIOUS SIMILAR EVENTS

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