UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

November 14, 2019

Mr. Ken Peters
Senior Vice President and Chief Nuclear Officer
Attention: Regulatory Affairs
Vistra Operations Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000445/2019010 AND 05000446/2019010

Dear Mr. Peters:

On October 3, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your Comanche Peak Nuclear Power Plant, Units 1 and 2, and discussed the results of this inspection with Mr. Tom McCool, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed the station's corrective action program and the station's implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for corrective action programs. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

The team also evaluated the station's processes for use of industry and NRC operating experience information and the effectiveness of the station's audits and self-assessments. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

Finally, the team reviewed the station's programs to establish and maintain a safety-conscious work environment and interviewed station personnel to evaluate the effectiveness of these programs. Based on the team's observations and the results of these interviews, the team found no evidence of challenges to your organization's safety-conscious work environment. Your employees appeared willing to raise nuclear safety concerns through at least one of the several means available.

The NRC inspectors did not identify any finding or violation of more than minor significance.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Ramon V. Azua, Team Leader
Inspection Programs and Assessment Team
Division of Reactor Safety

Docket Nos. 05000445 and 05000446
License Nos. NPF-87 and NPF-89

Enclosure:
As stated

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COMANCHE PEAK POWER PLANT – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000445/2019010 AND 05000446/2019010 – November 14, 2019

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☒ SUNSI Review By: RAzua	ADAMS: ☒ Yes ☐ No	☐ Non-Publicly Available ☒ Publicly Available	☒ Non-Sensitive ☐ Sensitive	Keyword: NRC-002

OFFICE	SPE/DRP	RI/IPAT	RI/DRP	NSE/DRS	BC:DRP/B	TL/IPAT
NAME	JBraisted	BCorrell	NDay	HFreeman	NO'Keefe	RAzua
SIGNATURE	/RA/	/RA/	/RA/	/RA/	/RA/	/RA/
DATE	11/13/2019	11/13/2019	11/13/19	11/13/2019	11/14/19	11/14/19

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000445 and 05000446
License Numbers:	NPF-87 and NPF-89
Report Numbers:	05000445/2019010 and 05000446/2019010
Enterprise Identifier:	I-2019-010-0016
Licensee:	Vistra Operations Company LLC
Facility:	Comanche Peak Power Plant
Location:	Glen Rose, TX
Inspection Dates:	September 16, 2019, to October 03, 2019
Inspectors:	J. Braisted, Senior Project Engineer B. Correll, Reactor Inspector N. Day, Resident Inspector H. Freeman, Senior Reactor Engineer
Approved By:	Ramon V. Azua, Team Leader Inspection Programs and Assessment Team Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a biennial problem identification and resolution inspection at Comanche Peak Power Plant in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – BASELINE

71152B - Problem Identification and Resolution

Biennial Team Inspection (IP Section 02.04) (1 Sample)

The team performed a biennial assessment of the licensee's corrective action program, use of operating experience, self-assessments and audits, and safety-conscious work environment.

(1) Corrective Action Program Effectiveness: The team reviewed the station's corrective action program and implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for corrective action program. The sample included reviews of nearly 200 condition reports and associated records in addition to in-depth 5-year reviews of condition reports associated with safety-related inverters.

Operating Experience: The inspectors assessed the effectiveness of the station's processes for use of operating experience. The team reviewed the process used to receive, distribute, and evaluate operating experience by reviewing five examples that had been received during the assessment period.

Self-Assessments and Audits: The inspectors assessed the effectiveness of the licensee audits and self-assessments. The team reviewed four self-assessments (benchmark, simple, formal departmental) and audits.

Safety Conscious Work Environment: The inspectors assessed the effectiveness of the station's programs to establish and maintain a safety-conscious work environment. The team interviewed 50 station personnel in five focus group interviews as well as in individual interviews. These groups included personnel from operations, maintenance, health physics, engineering, and security. The team observed interactions between employees during the condition report screening meetings and during operational focus meetings, management review committee meetings, and Station Operations Review Committee meeting. The team interviewed the employee concerns coordinator and reviewed the results of the site's latest safety culture surveys and investigations related to safety-conscious work environment.

INSPECTION RESULTS

Assessment	71152B
Corrective Action Program Effectiveness Based on the samples reviewed, the team determined that the licensee's corrective action program complied with regulatory requirements and self-imposed standards. The licensee's performance in each of the areas of Problem Identification, Prioritization and Evaluation, and Corrective Actions adequately supported nuclear safety. The team found that the licensee was identifying and documenting problems at an appropriately low threshold that supported nuclear safety. During the 2-year assessment period, the licensee had initiated 12,645 issue reports which averages to approximately 575 per month. Issue reports are the licensee's term for corrective action documents before they are screened as a condition adverse to quality or regulatory compliance, or a non-adverse condition. The team found that the licensee was adequately prioritizing and evaluating problems. Of the condition reports initiated during the assessment period, over 7,200 were classified as conditions adverse to quality while the rest were non-adverse. The licensee initiated zero root cause evaluations and 52 adverse condition assessments. The team did not identify any examples of conditions adverse to quality that had been misclassified as non-adverse. The team found that the licensee was developing and implementing corrective actions. The corrective actions appear to be effective and implemented in a time frame commensurate with significance.	

Assessment	71152B
Use of Operating Experience The team reviewed the licensee's process for identifying and evaluating operating experience. Based upon a review of the operating experience program and selected examples, the team determined the licensee's process for evaluating industry operating experience for relevance to the facility was effective. While the team identified an issue where the licensee's implementation did not match the program description, the team found that it did not negatively impact the program. The licensee initiated corrective actions to address the discrepancy.	

Assessment	71152B
Self-Assessments and Audits The team reviewed five examples of self-assessments and audits that had been completed during the assessment period. The team found that these were self-critical and were being effectively used to identify issues. The team determined that the identified issues were entered into the corrective action program, and actions to address the issues were developed and tracked to completion by the responsible organizations.	

Assessment	71152B
Safety-Conscious Work-Environment Based on inspection interviews and insights obtained from safety culture and other relevant assessments, the team found that the licensee had established and maintained a safety-conscious work environment where individuals felt free to raise concerns without fear of retaliation. Employees indicated that they had numerous avenues for raising safety concerns including writing issue reports, discussions with their management, using the chain-of-command (open door policy), the employee concerns program and the NRC. However, the team did receive comments from some of the security officers associated with certain changes that had been implemented within their organization (these changes had been previously inspected by the NRC and found to meet regulatory requirements) and associated with aspects of their work environment. Additional interviews with security officers and reviews of security logs indicated that security officers continued to identify and raise safety concerns as appropriate. The team concluded that these types of issues could eventually impact the safety-conscious work-environment and discussed specific aspects of these comments with senior licensee management for their information and actions as deemed appropriate. Through reviews of the employee concerns program documents, the latest site safety culture survey results, and summary listings of anonymously submitted concerns, the team did not identify any impediments to the free flow of information. The employee concerns program is the point of contact for all anonymously submitted concerns. The team did not identify any concerns that were submitted to the employee concerns program of a technical nature that were not addressed (as appropriate) by the corrective action program.	

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On October 3, 2019, the inspectors presented the biennial problem identification and resolution inspection results to Mr. Tom McCool, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152B	Corrective Action Documents	Condition Reports (CRs), Issue Reports (IRs), Trending Reports (TRs)	CR-2000-000142, CR-2012-006449, CR-2012-010090, CR-2012-012426, CR-2015-011094, CR-2017-005788, CR-2017-009887, CR-2017-010530, CR-2017-011090, CR-2017-011424, CR-2017-011968, CR-2017-012024, CR-2017-012922, CR-2017-012952, CR-2017-013020, CR-2017-013071, CR-2017-013243, CR-2017-013261, CR-2017-013264, CR-2017-013270, CR-2017-013405, CR-2017-013422, CR-2017-013424, CR-2017-013488, CR-2017-013494, CR-2017-013519, CR-2018-00088, CR-2018-000999, CR-2018-001550, CR-2018-001839, CR-2018-002189, CR-2018-003436, CR-2018-003509, CR-2018-003681, CR-2018-003694, CR-2018-003900, CR-2018-003921, CR-2018-004003, CR-2018-004038, CR-2018-004320, CR-2018-004591, CR-2018-004603, CR-2018-004608, CR-2018-004643, CR-2018-004701, CR-2018-004892, CR-2018-005098, CR-2018-005103, CR-2018-005130, CR-2018-005131, CR-2018-005132, CR-2018-005788, CR-2018-005831, CR-2018-006081, CR-2018-006115, CR-2018-006118, CR-2018-006180, CR-2018-006412, CR-2018-006453, CR-2018-006758, CR-2018-007207, CR-2018-007381, CR-2018-007640, CR-2018-007963, CR-2018-007997, CR-2018-008055, CR-2018-008140, CR-2018-008143, CR-2018-008405, CR-2018-009107, CR-2018-009147, CR-2019-000672, CR-2019-001052, CR-2019-001316, CR-2019-001688, CR-2019-001711, CR-2019-001944, CR-2019-001949, CR-2019-002364, CR-2019-002428, CR-2019-002533, CR-2019-002535, CR-2019-002742, CR-2019-002889, CR-2019-003138, CR-2019-003684, CR-2019-003704, CR-2019-004155, CR-2019-004340, CR-2019-004469, CR-2019-004542, CR-2019-004915, CR-2019-005092, CR-2019-005125, CR-2019-005405, CR-2019-005746, CR-2019-	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			006063, CR-2019-006079, CR-2019-006760, IR-2017-012520, IR-2017-012891, IR-2018-000528, IR-2018-001624, IR-2018-002513, IR-2018-003647, IR-2018-004113, IR-2018-004635, IR-2018-004857, IR-2018-007207, IR-2018-007512, IR-2019-007101, IR-2019-007224, IR-2019-007364, OER-2018-003750, SURV-2018-000069, TR-2017-010376, TR-2017-012374, TR-2017-013648, TR-2017-013687, TR-2018-000223, TR-2018-000472, TR-2018-001001, TR-2018-001052, TR-2018-001397, TR-2018-001904, TR-2018-001998, TR-2018-002038, TR-2018-002123, TR-2018-002468, TR-2018-002947, TR-2018-002948, TR-2018-004129, TR-2018-005525, TR-2018-005898, TR-2018-006037, TR-2018-006529, TR-2018-006894, TR-2018-007275, TR-2018-007288, TR-2019-000001, TR-2019-000114, TR-2019-001556, TR-2019-001581, TR-2019-001654, TR-2019-006117, TR-2019-006122	
	Corrective Action Documents Resulting from Inspection	Condition Reports (CRs), Issue Reports (IRs), Trending Reports (TRs)	CR-2019-007388, CR-2019-007547, CR-2019-007605, CR-2019-007610, CR-2019-007614, CR-2019-007653, IR-2019-007281, IR-2019-007412, IR-2019-007633, TR-2019-007594	
	Drawings	E1-0001, Sh. A	Plant One Line Diagram Unit 1 and Common Distribution Panels	CP-18
		E2-0001, Sh. A	Plant One Line Diagram	CP-4
		M1-0229, Sh. A	Flow Diagram Component Cooling Water System	CP-21
		M1-0241, Sh. 1	Flow DIagram Demineralized and Reactor Make Up Water	CP-28
		M2-0241, Sheet 1	Flow DIagram Demineralized and Reactor Make Up Water	CP-22
		M2-0262	Safety Injection System	CP-22
	Miscellaneous		Quality Assurance Manual	22
			CPNPP System Status	2nd QTR FY19
		7372	U2 SI Discharge Header Pressurization	11/14/2015
		ET325059HU	50.59 NRC Inspection Identified HU Errors	0
		FSAR Section	Compliance with NRC Regulatory Guide 1.81	109

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		8.3.1.2.1.8		
		NMG-719	Guidelines for Effective Station Meetings, Attachment 5: Standard Station Meeting List	06/04/2019
		TXX-19057	Comanche Peak Nuclear Power Plant Docket Nos. 50-445 and 50-446 Updated Response to Station Blackout Rule	05/16/2019
	Procedures	MSE-P0-5001	Non-Safety Battery Charger Load Tests	3
		MSE-S0-5713	Class 1E Battery Charger Load Test	6
		MSE-S0-6303	Molded Case Circuit Breaker Test and Inspection	8
		SOP-102B	Residual Heat Removal System	15
		SOP-201B	Safety Injection System	9
		SOP-607A	118 VAC Distribution System and Inverters	23
		SOP-607B	118 VAC Distribution System and Inverters	16
		STA-126	Nuclear Safety Culture Assessment and Monitoring Process	2
		STA-308	Protection of Safeguards Information and Other Controlled Information Types	16
		STA-421	Control of Issue Reports	21
		STA-422	Corrective Action Program	34
		STA-422.01	Operability Determination and Functionality Assessment Program	4
		STA-423	Tracking Reports	4
		STA-426	Industry Operating Experience Program	8
		STA-629	Switchyard Control and Transmission Grid Interface	8
		STI-400.01	Initiation of Issue Reports	0
		STI-421.02	Issue Report Reviews	1
		STI-422.03	Performing Coaching and Investigations	1
		STI-422.04	Processing of Condition Reports	0
		STI-423.01	Processing Tracking Reports	0
		STI-426.04	Preparing and Processing ICES Reports	1
		STI-600.01	Protecting Plant Equipment and Sensitive Equipment Controls	2
		STI-604.01	Integrated Risk Management	5
		STI-604.03	Weekly Surveillances / Work Scheduling	7
		STI-606.03	Work Planning	5

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		STI-748.01	System Monitoring and Health Reporting	2
	Self-Assessments	EVAL-2018-004	Emergency Preparedness	01/29/2018 - 03/14/2018
		EVAL-2018-006	Work Management/Radiation Protection Audit	06/06/2018 - 07/26/2018
		EVAL-2018-007	Configuration & Design Control	06/11/2018 - 08/29/2018
		EVAL-2018-012	Work Management	08/08/2018 - 10/02/2018