



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

July 9, 2020

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 – SECURITY
BASELINE INSPECTION REPORT 05000445/2020411 AND 05000446/2020411

Dear Mr. Peters:

On June 18, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2, and discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

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

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 Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Ray L. Kellar, P.E., Chief
Plant Support Branch 1
Division of Reactor Safety

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

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – SECURITY BASELINE
INSPECTION REPORT 05000445/2020411 AND 05000446/2020411 – July 9, 2020

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ADAMS ACCESSION NUMBER: ML20190A236

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

| | | | | | | |
|-----------|------------|------------|--------------|------------|--|--|
| OFFICE | PSI:PSB1 | PSI:PSB1 | C:PBB | C:PSB1 | | |
| NAME | JBuchanan | AMeyen | NO'Keefe | RKellar | | |
| SIGNATURE | /RA/ | /RA/ | /RA/ PJV for | /RA/ | | |
| DATE | 07/08/2020 | 07/08/2020 | 07/08/2020 | 07/09/2020 | | |

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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: 05000445/2020411 and 05000446/2020411

Enterprise Identifier: I-2020-411-0004

Licensee: Vistra Operations Company LLC

Facility: Comanche Peak Nuclear Power Plant, Units 1 and 2

Location: Glen Rose, Texas

Inspection Dates: June 15, 2020 to June 19, 2020

Inspectors: J. Buchanan, Physical Security Inspector
A. Meyen, Physical Security Inspector

Approved By: Ray L. Kellar, Chief
Plant Support Branch 1
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2, 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

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." 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. Publicly available IPs are located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

SAFEGUARDS

71130.04 - Equipment Performance, Testing, and Maintenance

Equipment Performance, Testing, and Maintenance (1 Sample)

- (1)
 - Tier I: all requirements
 - Tier II: all requirements
 - Tier III: all requirements

71130.07 - Security Training

Security Training (1 Sample)

- (1)
 - Tier I: all requirements
 - Tier II: all requirements
 - Tier III: all requirements except 02.14a, b

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On June 18, 2020, the inspectors presented the EXIT MEETING inspection results to Mr. T. McCool, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

| Inspection Procedure | Type | Designation | Description or Title | Revision or Date |
|----------------------|-----------------------------|-------------|---|------------------|
| 71130.04 | Corrective Action Documents | | CR-2019-008686, CR-2019-008686, CR-2020-003043, CR-2020-003903, CR-2020-004172, IR-2020-04212, IR-2020-004595, TR-2019-005108, TR-2019-005220, TR-2019-008852, TR-2020-000295, TR-2020-000470, TR-2020-001562, TR-2020-002436, TR-2020-002678, TR-2020-002694, TR-2020-003036, TR-2020-003293, TR-2020-003519, TR-2020-003670, TR-2020-003730, TR-2020-003746, TR-2020-003905, TR-2020-004010, TR-2020-004023, TR-2020-004595 | |
| | Miscellaneous | | Active IR Intrusion Detection System Site Acceptance Test | 07/15/2019 |
| | | | Alarm/Event Conditions Reports | 06/17/2020 |
| | | | Comanche Peak Nuclear Power Plant Firearms Inspection/Function Log | 2019 |
| | | | Comanche Peak Nuclear Power Plant Units 1 and 2 Security Plan | 12 |
| | | | Fiber Optic Sensor Intrusion Detection System Site Acceptance Test | 07/08/2019 |
| | | | Glasses Hearing Aids Report | 06/17/2020 |
| | | | Job Aid Pop-Ups Testing | |
| | | | Job Aid EntryScan 4 | 09/10/2019 |
| | | | Job Aid Itemiser 3 | 05/13/2020 |
| | | | Job Aid Mail Gate Testing | 01/23/2012 |
| | | | Keyboard Command Report | 06/17/2020 |
| | | | Reportability Job Aid | 07/02/2018 |
| | | | Security Field Report 0110-20 | |
| | | | Security Field Report 0171-20 | |
| | | | Security Field Report 0179-20 | |
| | | | Security Field Report 0193-20 | |
| | | | Security Field Report 0208-20 | |
| | | | Security Field Report 0335-19 | |
| | | | Weapons Maintenance Log | 2019 |
| | | NILECJ-STD- | CEIA Metal Detectors | |

| Inspection Procedure | Type | Designation | Description or Title | Revision or Date |
|----------------------|-----------------------------|--------------|---|------------------|
| | Procedures | 0601 | | |
| | | 1.0 | Security Instruction Common Instructions | 41 |
| | | 3.10 | Security Instruction Alarm Stations | 58 |
| | | 3.16 | Security Instruction Portable Explosive Detector Searches | 11 |
| | | 3.2 | Security Instruction Access Control | 65 |
| | | SEC-102 | Control of Security Plans, Procedures, Instructions, Job Aids and Forms | 26 |
| | | SEC-506 | Security Equipment and Firearms Testing and Observation | 36 |
| | | STI-421.02 | Issue Report Reviews | 1 |
| | Work Orders | | 405189, 3625020, 4927996, 5197061, 5398460, 5628696, 5656025, 5672324, 5732112, 5847991, 5877733, 5896323 | |
| 71130.07 | Corrective Action Documents | | 2018-000241, 2018-003539, 2018-003541, 2018-003679, 2019-002682, 2019-002959, 2019-004788, 2019-004791, 2020-001252, 2020-002160, 2020-004118 | |
| | Miscellaneous | | Armorer Certifications | |
| | | | Firearms Instructor Certifications | |
| | | | Security Training and Qualification Plan | |
| | | ITD8.OJT.TT1 | OJT Trainer/Evaluator | |
| | | SC06.PFT.QRI | Physical Agility (PT) Test | |
| | | SC21.DOC.CO6 | Testing and Documentation | |
| | | SC26.OJT.A14 | Security Officer OJT | |
| | | SC26.OJT.PTS | Security Officer Protective Strategy OJT | |
| | | SC32.UOF.UOI | Use of Force Study Guide | |
| | | SCD.FQR.TQR | Tactical Weapons Qualification | 2 |
| | | SCD.FRQ.DQR | Daylight Firearms Qualification | 9 |
| | | SCD.FRQ.NQR | Night Firearms Qualification | 9 |
| | Procedures | SEC-103 | Security Personnel Suitability and Qualification | 13 |
| | | SEC-104 | Security Training and Qualification | 20 |
| | | SEC-125 | Systematic Approach to Training | 3 |