



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

September 1, 2020

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

SUBJECT: UPDATED INSPECTION PLAN FOR COMANCHE PEAK NUCLEAR
POWER PLANT, UNITS 1 AND 2 (REPORT 05000445/2020005 AND
05000446/2020005)

Dear Mr. Peters:

The enclosed inspection plan lists the inspections scheduled through June 30, 2022, for the Comanche Peak Nuclear Power Plant. The U.S. Nuclear Regulatory Commission (NRC) provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. Routine inspections performed by resident inspectors are not included in the inspection plan. You should be aware that the agency is pursuing potential changes to the Reactor Oversight Process (ROP), including changes to engineering inspections (SECY-18-0113, "Recommendations for Modifying the Reactor Oversight Process Engineering Inspections"), and other changes to the baseline inspection program described in SECY-19-0067, "Recommendations for Enhancing the Reactor Oversight Process." Should these changes to the Reactor Oversight Process be implemented, the engineering and other region-based inspections are subject to change in scope, as well as schedule. The inspections listed during the last 12 months of the inspection plan are tentative and may be revised. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In response to the COVID-19 public health emergency (PHE), the NRC is adjusting inspection plans and schedules in order to safeguard the health and safety of both NRC and licensee staff while still effectively implementing the ROP. Each planned inspection is being carefully reviewed in order to determine if any portions of the inspection can be performed remotely, determine how best to perform on-site portions to minimize personnel health risks, and adjust inspection schedules if needed. This is done in accordance with guidance contained in the May 28, 2020, memorandum, "Inspection Guidance During Transition From COVID-19 Mandatory Telework" (Agencywide Documents Access and Management System (ADAMS) Accession Number ML20141L766). For inspections requiring extensive coordination with offsite organizations, such as evaluated emergency preparedness exercises, NRC guidance and frequently asked questions for security and emergency preparedness can be found here: <https://www.nrc.gov/about-nrc/covid-19/security-ep/>. Similarly, the NRC has developed guidance if force-on-force inspections cannot be completed as scheduled due to an emergency, such as the COVID-19 PHE. These changes help ensure the health and safety of both NRC and licensee staff while maintaining the NRC's important safety and security mission during the COVID-19 PHE. The attached inspection plan is accurate on the date of issuance, but remains

subject to change based on approval of potential exemption requests or other changes needed due to changing conditions in the COVID-19 PHE. NRC staff will contact your appropriate regulatory affairs staff in order to coordinate inspection planning and scheduling.

The NRC will also be performing baseline inspections of licensee cyber security programs. The specific schedule and procedure to be used for these inspections are being developed by the NRC staff. The staff expects to communicate the schedule for these inspections to each utility separately.

Additionally, during this period the NRC will schedule an additional inspection per a revised version of Temporary Instruction (TI) 2515/194, "Inspection of the Licensee's Implementation of Industry Initiative Associated with the Open Phase Condition Design Vulnerability in Electrical Power Systems (NRC Bulletin 2012-01)" for any sites who elect to implement the guidance of the "Industry Initiative on Open Phase Condition," Revision 3 (ADAMS Accession Number ML19163A176), which included an option for relying on annunciation and operator manual actions instead of automatic protective features to isolate a power supply affected by an open phase condition. Licensees will be individually notified when the NRC schedules these inspections.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at (817) 200-1141 with any questions you have regarding this letter

Sincerely,

/RA/

Neil F. O'Keefe, Chief
Reactor Projects Branch B
Division of Reactor Projects

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

Enclosure:
Inspection Plan

cc w/ encl: Distribution via LISTSERV®

UPDATED INSPECTION PLAN FOR COMANCHE PEAK NUCLEAR POWER PLANT,
UNITS 1 AND 2 (REPORT 05000445/2020005 AND 05000446/2020005) –
September 1, 2020

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OFFICE	PE:DRP/B	BC:DRP/B			
NAME	JFMelfi	NOKeefe			
DATE	08/25/2020	08/25/2020			

OFFICIAL RECORD COPY

IP 22 Inspection Activity Plan Report

Comanche Peak

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
CP 2020 WRITTEN RETAKE EXAM						2
1	10/13/2019	07/11/2020	EXRT	000491	RETAKE (EXRT)	
Fire Protection Inspection - CP						3
1, 2	06/22/2020	07/04/2020	IP 71111.21N.05	001646	Fire Protection Team Inspection (FPTI)	
Comanche Peak 1, 2 - Powered Operated Valve Inspection						3
1, 2	08/10/2020	08/14/2020	IP 71111.21N.02	001645	Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements	
1, 2	08/24/2020	08/28/2020	IP 71111.21N.02	001645	Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements	
Security Access Control .02						1
1, 2	08/24/2020	08/28/2020	IP 71130.02	000734	Access Control	
1, 2	08/24/2020	08/28/2020	IP 71130.09	001656	Security Plan Changes	
1, 2	08/24/2020	08/28/2020	IP 71151	001338	Performance Indicator Verification	
TI 2515/194 - CP						1
1, 2	09/21/2020	09/25/2020	TI 2515/194	000512	Inspection of the Licensee's Implementation of Industry Initiative Associated With the Open Phase Condition Design Vulnerabilities In Electric Power Systems (NRC Bulletin 2012-01)	
CPSES 2020 BRQ						3
1, 2	09/27/2020	10/03/2020	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	
EP Program Inspection						1
1, 2	10/05/2020	10/09/2020	IP 71114.02	000717	Alert and Notification System Testing	
1, 2	10/05/2020	10/09/2020	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1, 2	10/05/2020	10/09/2020	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2	10/05/2020	10/09/2020	IP 71114.05	000720	Maintenance of Emergency Preparedness	
1, 2	10/05/2020	10/09/2020	IP 71151	001397	Performance Indicator Verification	
RS13PI Radiation Safety						2
1, 2	11/02/2020	11/06/2020	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	11/02/2020	11/06/2020	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

IP 22 Inspection Activity Plan Report

Comanche Peak

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
RS8						1
1, 2	11/02/2020	11/06/2020	IP 71124.08	000732	Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation	
Design Bases Assurance (Team) 21M - Comanche Peak						6
1, 2	02/08/2021	02/26/2021	IP 71111.21M	000713	Design Bases Assurance Inspection (Teams)	
Security FFD .08						1
1, 2	02/22/2021	02/26/2021	IP 71130.08	000740	Fitness For Duty Program	
Comanche Peak ISFSI Loading Inspection (1 week in March)						2
1	03/01/2021	03/31/2021	IP 60855	001001	Operation Of An ISFSI	
1	03/01/2021	03/31/2021	IP 60857	001004	Review of 10 CFR 72.48 Evaluations	
In-Office EP Exercise Scenario Review - CP						4
1, 2	04/07/2021	05/17/2021	IP 71114.08	000723	Exercise Evaluation □ Scenario Review	
RP 2,4						2
1, 2	05/17/2021	05/21/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
1, 2	05/17/2021	05/21/2021	IP 71124.04	000728	Occupational Dose Assessment	
MCA - Material Control & Accounting						1
1, 2	05/17/2021	05/21/2021	IP 71130.11	000742	Material Control and Accounting (MC&A)	
EP Exercise and PI Inspection - CP						4
1, 2	06/14/2021	06/18/2021	IP 71114.01	000716	Exercise Evaluation	
1, 2	06/14/2021	06/18/2021	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2	06/14/2021	06/18/2021	IP 71151	001397	Performance Indicator Verification	
Security Protective Strategy .05 w/Exercise						2
1, 2	06/14/2021	06/18/2021	IP 71130.05	000737	Protective Strategy Evaluation	
CPSES 2021 INITIAL EXAM						4
1, 2	07/04/2021	07/10/2021	OV	000956	VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1, 2	08/08/2021	08/14/2021	EXAD	000500	LICENSE EXAM ADMINISTRATION (EXAD)	

IP 22 Inspection Activity Plan Report

Comanche Peak

07/01/2020 - 06/30/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
Security Access Authorization .01 and Access Control .02 w/PIV						2
1, 2	07/26/2021	07/30/2021	IP 71130.01	000733	Access Authorization	
1, 2	07/26/2021	07/30/2021	IP 71130.02	000734	Access Control	
1, 2	07/26/2021	07/30/2021	IP 71130.09	001656	Security Plan Changes	
1, 2	07/26/2021	07/30/2021	IP 71151	001338	Performance Indicator Verification	
Biennial PI&R Inspection						4
1, 2	09/13/2021	09/17/2021	IP 71152B	000747	Problem Identification and Resolution	
1, 2	09/27/2021	10/01/2021	IP 71152B	000747	Problem Identification and Resolution	
Inservice Inspection 2RF19 - CP						1
2	10/11/2021	10/22/2021	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RP 1,2,PI						2
1, 2	10/18/2021	10/22/2021	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	10/18/2021	10/22/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
RP 5,8						2
1, 2	01/31/2022	02/04/2022	IP 71124.05	000729	Radiation Monitoring Instrumentation	
1, 2	01/31/2022	02/04/2022	IP 71124.08	000732	Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation	
Inservice Inspection 1RF22 - CP						1
1	04/18/2022	04/29/2022	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RP 1,2,PI						2
1, 2	04/25/2022	04/29/2022	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	04/25/2022	04/29/2022	IP 71124.02	000726	Occupational ALARA Planning and Controls	