



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

March 3, 2021

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

SUBJECT: ANNUAL ASSESSMENT LETTER FOR COMANCHE PEAK NUCLEAR POWER
PLANT, UNITS 1 AND 2 (REPORT 05000445/2020006 AND
05000446/2020006)

Dear Mr. Peters:

The U.S. Nuclear Regulatory Commission (NRC) has completed its end-of-cycle performance assessment of Comanche Peak Nuclear Power Plant, Units 1 and 2, reviewing performance indicators (PIs), inspection results, and enforcement actions from January 1, 2020 through December 31, 2020. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. The NRC concluded that overall performance at your facility preserved public health and safety. The baseline inspection program was completed at your facility as defined in Inspection Manual Chapter 2515, "Light-Water Reactor Inspection Program - Operations Phase."

The NRC determined the performance at Comanche Peak Nuclear Power Plant, Units 1 and 2, during the most recent quarter was within the Licensee Response Column, the highest performance category of the NRC's Reactor Oversight Process (ROP) Action Matrix, because all inspection findings had very low safety significance (i.e., Green), and all PIs were within the expected range (i.e., Green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The enclosed inspection plan lists the inspections scheduled through December 31, 2022. The 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. The inspections listed during the last twelve 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, 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 February 1, 2021 memo, "Calendar Year 2021 Inspection Guidance During COVID-19 Telework Restrictions" (Agency Documents Access and Management System (ADAMS) Accession Number ML21027A274). 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.

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 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* 2.390 of the NRC's "Agency Rules of Practice and Procedure," 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,

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

Docket Nos. 50-445 and 50-446
License Nos. NPF-87 and NPF-89

Enclosure:
Inspection Plan

cc w/ encl: Distribution ® LISTSERV

ANNUAL ASSESSMENT LETTER FOR COMANCHE PEAK NUCLEAR POWER PLANT,
 UNITS 1 AND 2 (REPORT 05000445/2020006 AND 05000446/2020006) – DATED
 MARCH 3, 2021

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 ROP Reports
 ROP Assessment

ADAMS ACCESSION NUMBER: **ML21055A005**

SUNSI Review ADAMS: Non-Publicly Available Non-Sensitive Keyword:
 By: **DLP** Yes No Publicly Available Sensitive NRC-002

OFFICE	SPE:DRP/B	C:DRP/B			
NAME	DProulx	NO'Keefe			
SIGNATURE	<i>DLP</i>	<i>NFO</i>			
DATE	02/18/2021	03/03/2021			

OFFICIAL RECORD COPY

IP 22 Inspection Activity Plan Report

Comanche Peak

01/01/2021 - 12/31/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
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	
CPNPP ISFSI Security, IP 81311						1
1	02/22/2021	02/24/2021	IP 81311	001006	Physical Security Requirements for Independent Spent Fuel Storage Installations	
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)	
TI 2515/194-CP						2
1, 2	05/24/2021	05/28/2021	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)	

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Comanche Peak

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Unit	Start	End	Activity	CAC	Title	Staff Count
Security Protective Strategy .05 w/Exercise						2
1, 2	05/24/2021	05/28/2021	IP 71130.05	000737	Protective Strategy Evaluation	
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	
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)	
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	

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Unit	Start	End	Activity	CAC	Title	Staff Count
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	
Security Access Control .02						1
1, 2	03/21/2022	03/25/2022	IP 71130.02	000734	Access Control	
1, 2	03/21/2022	03/25/2022	IP 71151	001338	Performance Indicator Verification	
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	
Security Training/Equip Maint .07 and .04						2
1, 2	07/11/2022	07/15/2022	IP 71130.04	000736	Equipment Performance, Testing, and Maintenance	
1, 2	07/11/2022	07/15/2022	IP 71130.07	000739	Security Training	
FORCE-ON-FORCE PLANNING AND EXERCISE WEEKS - CP						6
1, 2	10/03/2022	10/07/2022	IP 71130.03	000735	Contingency Response - Force-On-Force Testing	
1, 2	10/31/2022	11/04/2022	IP 71130.03	000735	Contingency Response - Force-On-Force Testing	
CP 2022 BRQ						3
1, 2	10/23/2022	10/29/2022	IP 71111.11A	000703	Licensed Operator Requalification Program and Licensed Operator Performance	
1, 2	10/23/2022	10/29/2022	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	

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Comanche Peak

01/01/2021 - 12/31/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
EP Program & PI Inspection - CP						1
1, 2	10/24/2022	10/28/2022	IP 71114.02	000717	Alert and Notification System Testing	
1, 2	10/24/2022	10/28/2022	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1, 2	10/24/2022	10/28/2022	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2	10/24/2022	10/28/2022	IP 71114.05	000720	Maintenance of Emergency Preparedness	
1, 2	10/24/2022	10/28/2022	IP 71151	001397	Performance Indicator Verification	