

Information Request
Biennial Problem Identification and Resolution Inspection
Comanche Peak Nuclear Power Plant, Units 1 & 2
January 13, 2021

Inspection Report: 50-445; 50-446/2021010
On-site Inspection Dates: August 9-13 & August 23-27, 2021

This inspection will cover the period from October 5, 2019, through August 27, 2021. All requested information is limited to this period or to the date of this request unless otherwise specified. To the extent possible, the requested information should be provided electronically in word-searchable Adobe PDF (preferred) or Microsoft Office format. Any sensitive information should be provided in hard copy during the team's first week on site; do not provide any sensitive or proprietary information electronically.

Lists of documents ("summary lists") should be provided in Microsoft Excel or a similar sortable format. Please be prepared to provide any significant updates to this information during the team's first week of on-site inspection. As used in this request, "corrective action documents" refers to condition reports, notifications, action requests, cause evaluations, and/or other similar documents, as applicable to the Comanche Peak Nuclear Power Plant.

Please provide the following information no later than July 23, 2021:

i. Document Lists

Note: For these summary lists, please include the document/reference number, the document title, initiation date, current status, and long-text description of the issue.

- a. Summary list of all corrective action documents related to significant conditions adverse to quality that were opened, closed, or evaluated during the period
- b. Summary list of all corrective action documents related to conditions adverse to quality that were opened or closed during the period
- c. Summary list of all apparent cause evaluations (or equivalent) performed during the period; if fewer than approximately 20, provide full documents
- d. Summary list of all currently open corrective action documents associated with conditions first identified prior to the beginning of the inspection period
- e. Summary lists of all corrective action documents that were upgraded or downgraded in priority/significance during the period (these may be limited to those downgraded from, or upgraded to, apparent-cause level or higher)
- f. Summary list of all corrective action documents initiated during the period that identify an adverse or potentially adverse trend in safety-related or risk-significant equipment performance or in any aspect of the station's safety culture.
- g. Summary lists of operator workarounds, operator burdens, temporary modifications, and control room deficiencies (1) currently open and (2) that were

evaluated and/or closed during the period; this should include the date that each item was opened and/or closed.

- h. Summary list of all prompt operability determinations or other engineering evaluations to provide reasonable assurance of operability
- i. Summary list of plant safety issues raised or addressed by the Employee Concerns Program (or equivalent) (sensitive information should be made available during the team's first week on site—do not provide electronically)
- j. Summary list of all Apparent Cause Evaluations completed during the period

2. Full Documents with Attachments

- a. Root Cause Evaluations completed during the period; include a list of any planned or in progress
- b. Quality Assurance audits performed during the period
- c. Audits/surveillances performed during the period on the Corrective Action Program, of individual corrective actions, or of cause evaluations
- d. Functional area self-assessments and non-NRC third-party assessments (e.g., peer assessments performed as part of routine or focused station self- and independent assessment activities; do not include INPO assessments) that were performed or completed during the period; include a list of those that are currently in progress
- e. Any assessments of the safety-conscious work environment at the Comanche Peak Nuclear Power Plant, including any safety culture survey results; if none performed during the inspection period, provide the most recent
- f. Corrective action documents generated during the period associated with the following:
 - i. NRC findings and/or violations issued to the Comanche Peak Nuclear Power Plant
 - ii. Licensee Event Reports issued by the Comanche Peak Nuclear Power Plant
- g. Corrective action documents generated for the following, if they were determined to be applicable to the Comanche Peak Nuclear Power Plant (for those that were evaluated but determined not to be applicable, provide a summary list):
 - i. NRC Information Notices, Bulletins, and Generic Letters issued or evaluated during the period
 - ii. Part 21 reports issued or evaluated during the period

- iii. Vendor safety information letters (or equivalent) issued or evaluated during the period
- iv. Other external events and/or Operating Experience evaluated for applicability during the period
- h. Corrective action documents generated for the following:
 - i. Maintenance preventable functional failures which occurred or were evaluated during the period
 - ii. Adverse trends in equipment, processes, procedures, or programs that were evaluated during the period
 - iii. Action items generated or addressed by offsite review committees during the period

3. Logs and Reports

- a. Corrective action performance trending/tracking information generated during the period and broken down by functional organization (if this information is fully included in item 3.b, it need not be provided separately)
- b. Current system health reports, Management Review Meeting package, or similar information; provide past reports as necessary to include ≥12 months of metric/trending data
- c. Radiation protection event logs during the period
- d. Security event logs and security incidents during the period (sensitive information should be made available during the team's first week on site—do not provide electronically) – We will need to discuss how we will handle this item for this inspection
- e. Employee Concern Program (or equivalent) logs (sensitive information should be made available during the team's first week on site—do not provide electronically)
- f. List of training deficiencies, requests for training improvements, and simulator deficiencies for the period

Note: For items 3.c–3.d, if there is no log or report maintained separate from the corrective action program, please provide a summary list of corrective action program items for the category described.

4. Procedures

Note: For these procedures, please include all revisions that were in effect at any time during the period.

- a. Corrective action program procedures, to include initiation and evaluation procedures, operability determination procedures, cause evaluation

procedures, and any other procedures that implement the corrective action program at the Comanche Peak Nuclear Power Plant

- b. Quality Assurance program procedures (specific audit procedures are not necessary)
- c. Employee Concerns Program (or equivalent) procedures
- d. Procedures which implement/maintain a Safety Conscious Work Environment
- e. Conduct of Operations procedure (or equivalent) and any other procedures or policies governing control room conduct, operator burdens and workarounds, etc.
- f. Operating Experience (Ope) program procedures and any other procedures or guidance documents that describe the site's use of OpE information

5. Other

- a. List of risk-significant components and systems, ranked by risk worth; if the list uses system designators, provide a list of the associated equipment/system names
- b. List of structures, systems and components and/or functions that were in maintenance rule(a)(1) status or evaluated for (a)(1) status at any time during the inspection period; include dates and results of expert panel reviews and dates of status changes
- c. Organization charts for plant staff and long-term/permanent contractors
- d. Electronic copies of the UFSAR (or equivalent), technical specifications, and technical specification bases, if available
- e. Table showing the number of corrective action documents (or equivalent) initiated during each month of the inspection period, by screened significance
- f. For each day the team is inspecting,
 - i. Planned work/maintenance schedule for the station
 - ii. Schedule of management or corrective action review meetings (e.g. operations focus meetings, condition report screening meetings, CARBs, MRMs, challenge meetings for cause evaluations, etc.)
 - iii. Agendas and materials for these meetings

Note: The items listed in 5.f may be provided on a weekly or daily basis after the team arrives on site.

All requested documents should be provided electronically (e.g., Certrec's IMS) where possible.

Ray Azua
U.S. NRC Senior Reactor Inspector
Inspection Program and Assessment Team
Division of Reactor Safety, Region IV
1600 E. Lamar Blvd, Arlington, TX 76011
Ray.Azua@nrc.gov
Cell: (817) 319-4376

From: [Azua, Ray](#)
To: [Merka, Gary](#)
Subject: Comanche Peak 2021 PI&R Request for Information
Date: Friday, June 11, 2021 2:52:00 PM
Attachments: [CP 2021 PIR Request for Information.docx](#)

Gary,

Please find attached the Request for Information for the upcoming Comanche Peak PI&R inspection. Due to the conditions created by the Corona Virus pandemic, this inspection is expected to be performed remotely, however, due to rapidly changing conditions, this may be up for discussion. Please call me if you have any questions.

Sincerely,

Ray