



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

June 23, 2021

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

**SUBJECT: REVISED REPORT - COMANCHE PEAK NUCLEAR POWER PLANT,
UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT
05000445/2021001; 05000446/2021001 AND INDEPENDENT SPENT
FUEL STORAGE INSPECTION 07200074/2021001**

Dear Mr. Peters:

On March 31, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2. On April 16, 2021, the NRC inspectors discussed the results of this inspection with Mr. Thomas McCool and other members of your staff. The results of this inspection are documented in the enclosed report.

One finding of very low safety significance (Green) is documented in this report. This finding did not involve a violation of NRC requirements.

This report is being revised to include the inspection report number, docket number and Enterprise Identifier associated with the inspection of the Comanche Peak independent spent fuel storage installation, which were inadvertently omitted in the original report.

If you disagree with a finding not associated with a regulatory requirement in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; and the NRC Resident Inspector at Comanche Peak Nuclear Power Plant, Units 1 and 2.

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,

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

Docket Nos. 05000445, 05000446,
and 07200074
License Nos. NPF-87 and NPF-89

Enclosure:
As stated

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REVISED REPORT - COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2
 – INTEGRATED INSPECTION REPORT 05000445/2021001; 05000446/2021001 AND
 INDEPENDENT SPENT FUEL STORAGE INSPECTION 07200074/2021001 –
 JUNE 23, 2021

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000445; 05000446 and 07200074

License Numbers: NPF-87 and NPF-89

Report Numbers: 05000445/2021001; 05000446/2021001 and 07200074/2021001

Enterprise Identifier: I-2021-001-0095 and 1-2021-001-006

Licensee: VISTRA Operations Company, LLC

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

Location: Glen Rose, TX 76043

Inspection Dates: January 1, 2021 to March 31, 2021

Inspectors: L. Brookhart, Senior Spent Fuel Storage Inspector
N. Day, Resident Inspector
J. Drake, Senior Reactor Inspector
J. Ellegood, Senior Resident Inspector
S. Hedger, Emergency Preparedness Inspector
J. Melfi, Project Engineer

Approved By: Neil F. O'Keefe, Jr., Chief
Reactor Projects Br B
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated 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

Failure of Unit 1 Turbine First Stage Pressure Line			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green FIN 05000445/2021001-01 Open/Closed	None (NPP)	71111.12
The inspectors identified a finding of very low safety significance, Green, following the failure of a weld on the root valve for the main turbine first stage pressure transmitter 1-PT-0505. Specifically, the licensee replaced the valve during the fall 2020 refueling outage. The new valve was not the same model as the installed valve which resulted in premature failure of a weld because the new valve induced harmonic vibration, resulting in an unplanned shutdown to make repairs. The licensee failed to properly control inventory in the supply system. As a result, the licensee installed a valve in the plant without doing the necessary part evaluations needed to verify it was appropriate for the application.			

Additional Tracking Items

None.

PLANT STATUS

Units 1 began the inspection period at or near 100 percent power. On March 29, 2021, Unit 1 main feedwater pump A tripped. An automatic runback occurred in response to the main feedwater pump trip which reduced power to about 57 percent. Unit 1 remained at about 57 percent power for the remainder of the inspection period.

Unit 2 operated at or near rated thermal power for the entire inspection period.

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.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the Coronavirus Disease 2019 (COVID-19), resident inspectors were directed to begin telework and to remotely access licensee information using available technology. During this time, the resident inspectors performed periodic site visits each week; conducted plant status activities as described in IMC 2515, Appendix D, "Plant Status"; observed risk-significant activities; and completed on-site portions of IPs. In addition, resident and regional baseline inspections were evaluated to determine if all or portions of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on-site. The inspections documented below met the objectives and requirements for completion of the IP.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather Sample (IP Section 03.01) (1 Sample)

- (1) On February 11, 2021, the inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of cold weather per procedure OWI-912, "Cold Weather," for the following systems:

- Station Service Water
- Fire Water
- Emergency Diesel Generators

Impending Severe Weather Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated the adequacy of the overall preparations to protect risk-significant systems from impending severe weather for high winds on January 14, 2021

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Systems, structures and components in service water and fire water for both units that were vulnerable to freezing following extreme cold on February 20, 2021
- (2) Unit 1, residual heat removal system A following quarterly surveillance on March 11, 2021

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Flex equipment storage building, area X-FX-2K19, on February 22, 2021
- (2) Unit 1, main feedwater pumps, area TB, on March 12, 2021
- (3) Station service water intake structure, area WB, on March 22, 2021
- (4) Unit 1, safeguards building ventilation, area SK17a, on March 30, 2021
- (5) Unit 1, main steam isolation and atmosphere relief valve room, area SK17c, on March 30, 2021

Fire Brigade Drill Performance Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated the onsite fire brigade training and performance during an unannounced fire drill on March 18, 2021

71111.06 - Flood Protection Measures

Cable Degradation (IP Section 03.02) (1 Sample)

The inspectors evaluated cable submergence protection in:

- (1) Unit 1, station service water cable vault E1B2 on January 28, 2021.

71111.07A - Heat Sink Performance

Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

- (1) Unit 1, containment spray pump 1-01 and lube oil cooler 1-03

71111.11Q - Licensed Operator Regualification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01)
(1 Sample)

- (1) The inspectors observed and evaluated licensed operator performance in the control room during service water restoration on March 26, 2021

Licensed Operator Regualification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated a simulated complete loss of component cooling water on January 27, 2021

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components (SSCs) remain capable of performing their intended function:

- (1) Unit 1, service water pump fouling on November 18, 2020
- (2) Failure of Unit 1 PT-0505, turbine first stage pressure transmitter, instrument line on November 6, 2020

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (6 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Unit 2, simultaneous scheduling power range nuclear instrument calibrations for N-41 and N-42 on January 4, 2021
- (2) Unit 1, unplanned inoperability train B auxiliary feedwater (AFW) pump on January 6, 2021
- (3) Recovery of breaker 1A1-1, normal offsite power to nonvital 6.9KV on January 20, 2021
- (4) Low temperatures and high grid load during the week of February 15, 2021
- (5) Extended service water pump 2-02 outage during the week of March 22, 2021
- (6) Unit 1, repairs to main feed pump A during the week of March 29, 2021

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (5 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Unit 1, repair of B AFW pump flow transmitter

- (2) Operability of 2-01 emergency diesel generator with unit trip light illuminated
- (3) Offsite power with low frequency on February 15, 2021
- (4) Service water pumps pursuant to Generic Letter 91-13.
- (5) Circuit breaker 1EB3-3 due to missing overcurrent testing

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following permanent modification:

- (1) Unit 1, PT-0505 modification to improve vibration resilience

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the following post-maintenance test activities to verify system operability and functionality:

- (1) Unit 1, motor driven AFW flow transmitter 1-FT-2457 on January 12, 2021
- (2) Component cooling water pump 1-02 breaker replacement on February 4, 2021.
- (3) Unit 2, main steam isolation valve 2-03 following pressure gauge root valve leak on February 25, 2021
- (4) Unit 2, replacement of train A accident sequencer optical isolator on March 16, 2021
- (5) Service water pump 2-02 following replacement on March 27, 2021

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (2 Samples)

- (1) Unit 2, power range nuclear instrument on January 5, 2021
- (2) Unit 2, reactor trip breaker B on January 25, 2021

71114.04 - Emergency Action Level and Emergency Plan Changes

Inspection Review (IP Section 02.01-02.03) (1 Sample)

- (1) The licensee submitted a summary of emergency plan changes (Revision 44) to the NRC on November 12, 2020. The inspectors conducted an in-office review of the changes from January 4 to 21, 2021. This evaluation does not constitute NRC approval

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

IE01: Unplanned Scrams per 7000 Critical Hours Sample (IP Section 03.01) (2 Samples)

- (1) Unit 1 (January 1, 2020, through December 31, 2020)
- (2) Unit 2 (January 1, 2020, through December 31, 2020)

IE03: Unplanned Power Changes per 7000 Critical Hours Sample (IP Section 03.02) (2 Samples)

- (1) Unit 1 (January 1, 2020, through December 31, 2020)
- (2) Unit 2 (January 1, 2020, through December 31, 2020)

IE04: Unplanned Scrams with Complications (USwC) Sample (IP Section 03.03) (2 Samples)

- (1) Unit 1 (January 1, 2020, through December 31, 2020)
- (2) Unit 2 (January 1, 2020, through December 31, 2020)

71152 - Problem Identification and Resolution

Annual Follow-up of Selected Issues (IP Section 02.03) (2 Samples)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

- (1) Lack of engineering rigor on multiple engineering products
- (2) Unit 1, main feed water pump A cause evaluation and corrective actions described in Condition Report 2020-07334

71153 - Followup of Events and Notices of Enforcement Discretion

Event Followup (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated the Unit 1 main feedwater pump A trip and licensee's response on March 29, 2021
- (2) The inspectors evaluated the response to severe cold weather and grid frequency variations during the week of February 13, 2021

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

60855 - Operation of An Independent Spent Fuel Storage Installation (ISFSI)

The inspectors performed a review of the licensee's ISFSI activities to verify compliance with requirements of the Certificate of Compliance 72-1014, License Amendment 7, and the HI-STORM ISFSI Final Safety Analysis Report (FSAR), Revision 9. The inspectors reviewed selected procedures, corrective action reports, and records to verify ISFSI operations were

compliant with the Certificate's Technical Specifications, requirements in the FSAR, and NRC regulations

Operation Of An ISFSI (1 Sample)

- (1) The inspectors evaluated the licensee's dry cask storage operations, from March 22 through 26, 2021, during an on-site inspection. The Comanche Peak ISFSI is located approximately 2,900 feet southeast of the Unit 1 reactor building within a separate protected area. The pad was designed to hold 84 HI-STORM 100S (Version B) loaded with the Multi-Purpose Canisters, each with 32 spent fuel assemblies (MPC-32). The pad is designed to store the casks in a 6 by 14 array. At the time of the routine loading inspection, the Comanche Peak ISFSI pad contained a total of 43 HI-STORM 100S overpacks. The licensee was in the process of transporting the 44th cask to the ISFSI and loading/processing the 45th cask in the spent fuel building

During the on-site inspection, the inspectors evaluated and observed the following activities:

- Walk-down of the ISFSI haul path
- Transportation of the 44th cask on the vertical cask transporter from the spent fuel building to the ISFSI
- Fuel assembly selection and placement into the 45th canister
- Heavy load lifts using the cask handling crane to remove the transfer cask with the loaded canister from the spent fuel pool to the canister processing area
- Welding and non-destructive testing of the lid-to-shell weld
- Processing of the spent nuclear fuel for storage, including bulk water removal, forced helium dehydration, and helium backfill operations
- Final sealing of the canister, including welding of the vent and port cover plates, non-destructive testing, and helium leak-testing

The inspectors reviewed and evaluated the following documentation during the inspection:

- Fuel selection evaluations for the canisters loaded since the last NRC ISFSI inspection, the inspectors reviewed the contents of casks 40-45 against the license's Technical Specifications for approved contents
- Radiation surveys for dose at the owner-controlled boundary to verify compliance with the requirements of 10 CFR 72.104 for calendar years 2019 and 2020
- Selected ISFSI related condition reports (CRs) issued since the last NRC ISFSI inspection (October 2019)
- Quality assurance (QA) program implementation, including recent QA audits, surveillances, receipt inspection, and quality control activities related to ISFSI operations
- Compliance to Technical Specifications for operational surveillance activities and FSAR required annual maintenance activities
- Documentation of annual maintenance activities for the site's cask handling crane and special lifting devices
- Selected licensee design changes and program changes to the ISFSI performed under the site's 10 CFR 72.48 program

- Changes made by the licensee in the site's 72.212 Evaluation Report from Revisions 11 to 12

INSPECTION RESULTS

Failure of Unit 1 Turbine First Stage Pressure Line			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green FIN 05000445/2021001-01 Open/Closed	None (NPP)	71111.12
<p>The inspectors identified a finding of very low safety significance (Green) following the failure of a weld on the main turbine first stage pressure transmitter root valve 1-MS-0285. Specifically, the licensee replaced the valve during the fall 2020 refueling outage. The new valve was not the same model as the installed valve which resulted in premature failure of a weld because the new valve induced harmonic vibration, resulting in an unplanned shutdown to make repairs. The licensee failed to properly control inventory in the supply system. As a result, the licensee installed a valve in the plant without doing the necessary part evaluations needed to verify it was appropriate for the application.</p>			
<p><u>Description:</u> The licensee replaced the main turbine first stage pressure transmitter root valve 1-MS-0285 during the fall 2020 refueling outage as a preventive maintenance activity. Shortly after unit start up, on November 6, 2020, main turbine first stage pressure transmitter 1-PT-0505 failed low. A parallel indicator continued to function correctly. A non-licensed operator investigated the condition and observed a steam plume from the inlet side of the instrument root valve 1-MS-0285. Since the leak could not be isolated, the licensee shut the unit down and replaced the valve.</p> <p>In order to understand the failure, the licensee contracted for an analysis of the failed weld. The lab performing the analysis determined the weld failed as a result of fatigue crack initiation. Further analysis by the licensee determined the failure occurred as a result of vibration at resonant frequency. This resonance response resulted from installation of a valve that weighed 2 pounds more than the previously installed valve, which altered the natural frequency of the section of piping.</p> <p>The inspectors reviewed the licensee's work order associated with valve replacement as well as procurement documents associated with the work. Supply chain documents revealed that the replacement valve was transferred to Comanche Peak from coal plant. When it arrived, the licensee accepted the valve into their inventory under the Texas Utility part number. At the time, Texas Utility was the corporate owner of Comanche Peak and numerous fossil plants. The licensee correlated the valve to locations for other steam instrument isolation valves; however, the valve was not initially correlated to location 1-MS-0285. An update to a logistics database in 1998 correlated the part number to the location for 1-MS-0285. In reviewing the procedure in effect in 1990, the inspectors determined that the procedure required the site to verify the material description matched that in the database for the part. If it did not, a new part number was required. In this case, the replacement valve did not match any valves with an existing part number; however, the licensee failed to assign the valve a new part number.</p> <p>PT-0505 provides indication of turbine first stage pressure as well as input to Anticipated Transient without Scram Mitigation System Actuation Circuitry (AMSAC) and the P-13 permissive. The AMSAC input allows AMSAC to arm when power is above 40 percent. Since</p>			

the instrument failed low, AMSAC would not automatically actuate and operators would have needed to manually initiate AMSAC if the system was needed. The P-13 permissive is associated with P-7 permissive which blocks certain trips when at low power.

During review of this issue, the licensee identified the technical cause of the weld failure. However, the licensee did not pursue the underlying cause that allowed an incorrect valve to be installed. The inspectors discussed potential performance deficiencies with the licensee which prompted the licensee to understand how the valve was issued for installation. The licensee plans to incorporate this event into training for supply chain staff.

Corrective Actions: The licensee documented the condition in their Corrective Action Program (CAP) as CR-2020-8429 and replaced the valve with the correct valve.

Corrective Action References: CR-2020-8429

Performance Assessment:

Performance Deficiency: The licensee failed to properly control inventory in the supply system. As a result, the licensee installed a valve in the plant without doing the necessary part evaluations needed to verify it was appropriate for the application. Consequently, the natural frequency of a high-pressure steam pressure transmitter piping changed causing premature failure. Repair of the leak required a plant shutdown.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors determined that the performance deficiency was more than minor because it adversely affected the mitigating system cornerstone objective of ensuring the reliability of systems that respond to initiating events. The performance deficiency had a substantive impact on the equipment performance attribute because the failure of the weld as a result of the performance deficiency led to PT-0505 unavailability. This instrument provides input to the P-13 permissive as well as the AMSAC system.

Significance: The inspectors assessed the significance of the finding using Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors reviewed the finding in using Appendix A of IMC 0609. The inspectors answered "no" to all of the questions in Exhibit 2, section A because the affected mitigating systems were only briefly non-functional; therefore, the finding screened as Green.

Cross-Cutting Aspect: Not Present Performance. No cross cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance. Specifically, the part designation error occurred in 1998.

Enforcement: Inspectors did not identify a violation of regulatory requirements associated with this finding.

Observation: Actions to address weaknesses in engineering rigor	71152
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The inspectors noted several examples in 2019 and 2020 regarding weaknesses in engineering technical rigor. These examples are documented as samples in reports:

05000445/2019004; 05000446/2019004 (ML20041D968)

05000445/2020002; 05000446/2020002 (ML20217L240)
05000445/2020004; 05000446/2020004 (ML21040A051)

The inspectors searched the corrective action program and identified several examples of where the site had attempted to improve engineering technical rigor, however, the inspectors concluded that the prior efforts had not been sustainable. The inspectors also reviewed a presentation on engineering technical rigor provided to engineering staff. The Inspectors noted that the training had not been given in over 10 years. The inspectors concluded that training on this frequency would not result in sustainable improvement. Subsequently, the inspectors discussed actions in place to improve and sustain engineering technical rigor. The licensee informed the inspectors that the site would have biennial training on engineering technical rigor. In addition, engineering supervisors provide reinforcement of engineering rigor during one on one discussions with engineers and in staff meetings. If the licensee maintains initiatives to improve engineering rigor, the inspectors expect to see improvement in engineering products.

Observation: Licensee Response to Frigid Weather	71153
During the week of February 14, 2021, Comanche Peak experienced frigid weather conditions for multiple days. Prior to the onset of the cold weather, the licensee implemented their abnormal procedure to prepare for cold weather with supplemental actions based on operating experience. The inspectors performed walkdowns of licensee actions using inspection procedure 71111.01. Following the onset of cold weather, the site experienced a grid frequency drop on February 15, 2021. As part of the response, as specified in ABN-601 "Response to a 138/345 KV System Malfuction," the licensee started train A emergency diesel generators in both units and transferred the train A emergency busses to the diesel. Concurrently, the shift manager contacted the grid operator and requested the grid operator recover grid frequency to greater than 59.9 Hz. The grid operator reduced grid load and operators restored the plant to a normal electrical configuration. The inspectors verified the licensee responded in accordance with approved procedures by discussion, log reviews, and computer trend reviews. The licensee maintained the plant in a stable condition with limited work activities for the rest of the week. The inspectors continued to monitor plant parameters and activities using procedures 71111.13 and 71111.15. After the cold weather subsided, on February 20, 2021, the inspectors used inspection procedure 71111.04 to inspect the condition of systems and components susceptible to freezing. The inspectors concluded site personnel maintained the plant in a safe condition and the cold weather did not cause significant damage to the plant.	

EXIT MEETINGS AND DEBRIEFS

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

- On January 21, 2021, the inspectors presented the Emergency Plan Revision In-Office Review Results inspection results to Mr. Patrick Allen, Manager, Emergency Preparedness and other members of the licensee staff.
- On March 25, 2021, the inspectors presented the routine ISFSI inspection results to Mr. Thomas McCool, Site Vice President, and other members of the licensee staff.
- On April 16, 2021, the inspectors presented the integrated inspection results to Mr. Thomas McCool and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
60855	Corrective Action Documents	CR-YYYY-NNNN TR-YYYY-NNNN	2019-009399, 2020-001626, 2020-008755, 2021-001243, TR-2019-008506, TR-2019-009009, TR-2020-000102, TR-2020-005224	
60855	Engineering Evaluations	EVAL-2019-009	Nuclear Oversight Core Performance Engineering and Fuel Management QA Audit	03/11/2020
60855	Engineering Evaluations	NUC 212 Cask 40	Cask Acceptability Report and Comprehensive Assembly Specifications Supplement	09/05/2019
60855	Engineering Evaluations	NUC-212 Cask 41	Cask Acceptability Report and Comprehensive Assembly Specifications Supplement	09/05/2019
60855	Engineering Evaluations	NUC-212 Cask 42	Cask Acceptability Report and Comprehensive Assembly Specifications Supplement	09/05/2019
60855	Engineering Evaluations	NUC-212 Cask 43	Cask Acceptability Report and Comprehensive Assembly Specifications Supplement	02/24/2021
60855	Engineering Evaluations	NUC-212 Cask 44	Cask Acceptability Report and Comprehensive Assembly Specifications Supplement	02/24/2021
60855	Engineering Evaluations	NUC-212 Cask 45	Cask Acceptability Report and Comprehensive Assembly Specifications Supplement	02/24/2021
60855	Miscellaneous	72.212 Report	CPNPP 10CFR72.212 Evaluation Report	12
60855	Procedures	DCS-201	Transporting Loaded and Unloaded HI-STORM	9
60855	Procedures	DCS-202	MPC Preparation for Loading	9
60855	Procedures	DCS-203	MPC Handling and Fuel Loading Operations	12
60855	Procedures	DCS-204	MPC Closure Operations (Sealing, Drying, Backfilling)	13
60855	Procedures	DCS-205	Stack-up and Transfer of Loaded MPC	10
60855	Procedures	OPT-102A-1	Operations Shiftly Routine Tests	15
71111.01	Work Orders		5939919	
71111.04	Procedures	SOP-102A	Residual Heat Removal System	22
71111.04	Work Orders		5820443	
71111.05	Fire Plans	FPI-108A	Fire Preplan for UNIT 1 SAFEGUARDS BUILDING MAIN STEAM PENETRATION AREA 880'-6"	4
71111.05	Fire Plans	FPI-2001	Fire Preplan for FLEX STORAGE BUILDING X-FX-2K19	1
71111.05	Fire Plans	FPI-302A	Fire Preplan for UNIT 1 & 2 TURBINE BUILDING ELEVATION 803'-0"	8

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.05	Fire Plans	FPI-701	Fire Preplan for SERVICE WATER INTAKE STRUCTURE ELEV. 796'-0" & 810'-6"	4
71111.07A	NDE Reports		Containment Spray Pump 1-01 and 1-03 Visual Inspection Report	01/20/2021
71111.12	Corrective Action Documents	CR-YYYY-NNNN	2020-7695, 2020-8429	
71111.12	Miscellaneous		Service water system health report	08/25/2020
71111.12	Miscellaneous		Maintenance Rule Database for Main Steam	
71111.12	Miscellaneous		Maintenance Rule Database for Unit 1 Service Water	
71111.12	Miscellaneous	6S832645	Material Transfer Form	05/01/1990
71111.12	Miscellaneous	MDIR-98-000314-00-00		03/13/1998
71111.12	Procedures	MMO-6.09	TSN Assignment and Transfer of Warehouse Material.	0
71111.13	Procedures	STI-600.01,	Protecting Plant Equipment and Sensitive Equipment Controls	3
71111.15	Corrective Action Documents	CR-YYYY-NNNN	2021-001393, 2021-1224, 2021-553	
71111.15	Miscellaneous	PQE 208	Rosemont Pressure Transmitter Plant Qualification Evaluation	12/23/2018
71111.18	Engineering Changes	FDA-2017-000020-01-01	Modify 1-PT-0505	2
71111.19	Procedures	OPT-205B	Containment Spray System Post Test for WO 5813767 and 5813740	18
71111.19	Work Orders		5405494, 595445	
71111.19	Work Orders		5958368	
71111.22	Work Orders		5790214	
71114.04	Miscellaneous		Comanche Peak Nuclear Power Plant Emergency Plan, Units 1 and 2	43
71114.04	Miscellaneous	AI-TR-2020-000756-13	Use of Terms "Onsite," "Offsite," "Site," "Site Boundary," and "Exclusion Area" in the Emergency Plan	09/16/2020
71114.04	Miscellaneous	CP-20200627, TXX-20093	Comanche Peak Nuclear Power Plant (CPNPP), Docket Nos. 50-445, 50-446; Transmittal of Revised Emergency Plan (Revision 44)	11/12/2020
71114.04	Miscellaneous	EV-TR-2018-	Remove Letter of Agreement References from Comanche	08/18/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		005896-5	Peak Emergency Plan Appendix H	
71114.04	Procedures	EPP-123	10 CFR 50.54(q) Screening and Evaluation of Changes to Emergency Plan Documentation	2
71152	Corrective Action Documents	CR-YYYY-NNNN	2018-1550, 2018-2038, 2020-008417	
71152	Corrective Action Documents	TR-YYYY-NNNN	2018-2038 ,2018-5898, 2020-5057, 2021-000414	