



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

September 1, 2021

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 05000445/2021005 AND  
05000446/2021005)

Dear Mr. Peters:

The enclosed inspection plan lists the inspections scheduled through June 30, 2023 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. 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.

Inspection procedure (IP) 71111.21N.03 is included in the inspection plan as a placeholder for your next Design Basis Assurance Inspection (Programs). The NRC is still determining the specific technical area to replace the previously performed power-operated valves programs inspection, IP 71111.21N.02. Once the inspection area has been determined, an inspection procedure will be issued publicly at least six months prior to the start of this inspection.

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 Reactor Oversight Process (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 February 1, 2021 memo, "Calendar Year 2021 Inspection Guidance During COVID-19 Telework Restrictions" (Agencywide Documents Access and Management System (ADAMS) Accession No. 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.

The NRC will also be performing baseline inspections of licensee cyber security programs. The specific schedule and procedure to be used for these inspections is 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 No. 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 "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  
Projects 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 via LISTSERV®

UPDATED INSPECTION PLAN FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 (REPORT 05000445/2021005 AND 05000446/2021005) - DATED SEPTEMBER 1, 2021

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 ROP Assessments  
 ROP Reports

ADAMS ACCESSION NUMBER: ML21237A513

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

OFFICE	PE:DRP/PBB	SPE:DRP/PBB	BC:DRP/PBB			
NAME	JMelfi JM	DProulx DLP	NO'Keefe nfo			
DATE	08/23/2021	08/23/2021	09/01/2021			

OFFICIAL RECORD COPY

# IP 22b Site Inspection Activity Plan

## Comanche Peak

07/01/2021 - 06/30/2023

Unit	Start	End	Activity	CAC	Title	Staff Count
<b>Security Access Authorization .01 and Access Control .02 w/PIV</b>						2
1, 2	7/26/2021	7/30/2021	IP 71130.01	000733	Access Authorization	
1, 2	7/26/2021	7/30/2021	IP 71130.02	000734	Access Control	
1, 2	7/26/2021	7/30/2021	IP 71130.09	001656	Security Plan Changes	
1, 2	7/26/2021	7/30/2021	IP 71151	001338	Performance Indicator Verification	
<b>Security FFD .08</b>						1
1, 2	8/2/2021	8/6/2021	IP 71130.08	000740	Fitness For Duty Program	
<b>Comanch Peak Biennial PI&amp;R Inspection</b>						4
1, 2	8/9/2021	8/13/2021	IP 71152B	000747	Problem Identification and Resolution	
1, 2	8/23/2021	8/27/2021	IP 71152B	000747	Problem Identification and Resolution	
<b>Security Protective Strategy .05 w/Exercise</b>						2
1, 2	8/16/2021	8/20/2021	IP 71130.05	000737	Protective Strategy Evaluation	
<b>TI 2515/194-CP</b>						2
1, 2	9/6/2021	9/10/2021	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)	
<b>Inservice Inspection 2RF19 - CP</b>						1
2	10/11/2021	10/22/2021	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
<b>RP 1,2,PI</b>						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	
<b>RP 5,8</b>						2
1, 2	1/31/2022	2/4/2022	IP 71124.05	000729	Radiation Monitoring Instrumentation	
1, 2	1/31/2022	2/4/2022	IP 71124.08	000732	Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation	
<b>Security Access Control .02</b>						1
1, 2	1/24/2022	5/6/2022	IP 71130.09	001656	Security Plan Changes	
1, 2	3/21/2022	3/25/2022	IP 71130.02	000734	Access Control	
1, 2	3/21/2022	3/25/2022	IP 71151	001338	Performance Indicator Verification	
<b>Inservice Inspection 1RF22 - CP</b>						1
1	4/18/2022	4/29/2022	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
<b>RP 1,2,PI</b>						2
1, 2	4/25/2022	4/29/2022	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	4/25/2022	4/29/2022	IP 71124.02	000726	Occupational ALARA Planning and Controls	

# IP 22b Site Inspection Activity Plan

## EP 2022 Exercise Scenario In-Office Review 71114.08 - CP

4

1, 2	5/22/2022	6/30/2022	IP 71114.08	000723	Exercise Evaluation □ Scenario Review
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## Heat Exchanger/Sink Performance Inspection - 07T - Comanche Peak

2

1, 2	7/25/2022	7/29/2022	IP 71111.07T	000700	Heat Sink Performance
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## EP 2022 Biennial EP Exercise & PI Inspection - CP

4

1, 2	7/25/2022	7/29/2022	IP 71114.01	000716	Exercise Evaluation
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1, 2	7/25/2022	7/29/2022	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes
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## 10 CFR 50.59 Inspection - 17T - Comanche Peak

3

1, 2	9/19/2022	9/23/2022	IP 71111.17T	000709	Evaluations of Changes, Tests, and Experiments
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## FORCE-ON-FORCE PLANNING AND EXERCISE WEEKS - CP

6

1, 2	10/3/2022	10/7/2022	IP 71130.03	000735	Contingency Response - Force-On-Force Testing
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1, 2	10/31/2022	11/4/2022	IP 71130.03	000735	Contingency Response - Force-On-Force Testing
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## CP 2022 BRQ

3

1, 2	10/23/2022	10/29/2022	IP 71111.11A	000703	Licensed Operator Requalification Program and Licensed Operator Performance
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1, 2	10/23/2022	10/29/2022	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance
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## EP 2022 Program & PI Inspection - CP

1

1, 2	10/24/2022	10/28/2022	IP 71114.02	000717	Alert and Notification System Testing
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1, 2	10/24/2022	10/28/2022	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System
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1, 2	10/24/2022	10/28/2022	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes
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1, 2	10/24/2022	10/28/2022	IP 71114.05	000720	Maintenance of Emergency Preparedness
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1, 2	10/24/2022	10/28/2022	IP 71151	001397	Performance Indicator Verification
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## Cyber Security Inspection - CP

2

1, 2	10/24/2022	10/28/2022	IP 71130.10P	000741	Cyber Security
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## Design Bases Assurance Inspection (Program) – 21N – Comanche Peak

3

1, 2	1/1/2023	6/30/2023	IP 71111.21N.03		Design Bases Assurance Inspections (Programs) 2023
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## Comanche Peak Biennial PI&R

4

1, 2	1/23/2023	1/27/2023	IP 71152B	000747	Problem Identification and Resolution
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1, 2	2/6/2023	2/10/2023	IP 71152B	000747	Problem Identification and Resolution
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## RP 2,4

2

1, 2	1/30/2023	2/3/2023	IP 71124.02	000726	Occupational ALARA Planning and Controls
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1, 2	1/30/2023	2/3/2023	IP 71124.04	000728	Occupational Dose Assessment
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## Security FFD .08

1

1, 2	2/13/2023	2/17/2023	IP 71130.08	000740	Fitness For Duty Program
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## Inservice Inspection 2RF20

1

2	4/24/2023	5/12/2023	IP 71111.08P	000702	Inservice Inspection Activities (PWR)
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# IP 22b Site Inspection Activity Plan

<b>RP 1,3,PI</b>						2
1, 2	5/1/2023	5/5/2023	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	5/1/2023	5/5/2023	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
<b>EP 2023 Exercise Scenario In-Office Rvw 71114.08 - CP</b>						4
1, 2	5/21/2023	6/24/2023	IP 71114.08	000723	Exercise Evaluation □ Scenario Review	
<b>CP 2023 INITIAL EXAM</b>						4
1, 2	5/14/2023	5/20/2023	OV	000956	FB-OR-ONSITE VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1, 2	6/11/2023	6/17/2023	EXAD	000500	FB-OR-INITIAL LICENSE EXAM ADMINISTRATION (EXAD)	
<b>Fire Protection Inspection - CP</b>						3
1, 2	6/12/2023	6/16/2023	IP 71111.21N.05	001646	Fire Protection Team Inspection (FPTI)	
1, 2	6/26/2023	6/30/2023	IP 71111.21N.05	001646	Fire Protection Team Inspection (FPTI)	