



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

October 7, 2021

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

**SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – BIENNIAL
PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT
05000445/2021010 AND 05000446/2021010**

Dear Mr. Peters:

On August 26, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your Comanche Peak Nuclear Power Plant, Units 1 and 2 and discussed the results of this inspection with Tom McCool, Site Vice President and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed the station's corrective action program and the station's implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for corrective action programs. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

The team also evaluated the station's processes for use of industry and NRC operating experience information and the effectiveness of the station's audits and self-assessments. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.


Finally the team reviewed the station's programs to establish and maintain a safety-conscious work environment, and interviewed station personnel to evaluate the effectiveness of these programs. Based on the team's observations and the results of these interviews the team found no evidence of challenges to your organization's safety-conscious work environment. Your employees appeared willing to raise nuclear safety concerns through at least one of the several means available.

No findings or violations of more than minor significance were identified during this inspection.

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,

 Signed by Ramirez Munoz, Frances
on 10/07/21

Frances C. Ramirez Munoz,
Team Lead,
Inspection Program & Assessment Team,
Division of Reactor Safety

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

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000445/2021010 AND 05000446/2021010 - DATED OCTOBER 7, 2021

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

Docket Numbers: 05000445 and 05000446

License Numbers: NPF-87 and NPF-89

Report Numbers: 05000445/2021010 and 05000446/2021010

Enterprise Identifier: I-2021-010-0004

Licensee: VISTRA Operating Company, LLC

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

Location: Glen Rose, TX

Inspection Dates: August 09, 2021 to August 26, 2021

Inspectors: R. Azua, Senior Reactor Inspector
B. Correll, Reactor Inspector
N. Day, Resident Inspector
C. Stott, Resident Inspector

Approved By: Frances C. Ramirez Munoz, Team Lead
Inspection Program & Assessment Team
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a biennial problem identification and resolution 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

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

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 (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion 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.

OTHER ACTIVITIES – BASELINE

71152B - Problem Identification and Resolution

Biennial Team Inspection (IP Section 02.04) (1 Sample)

- (1) The inspectors performed a biennial assessment of the licensee's corrective action program, use of operating experience, self-assessments and audits, and safety conscious work environment.
 - Corrective Action Program Effectiveness: The inspectors assessed the corrective action program's effectiveness in identifying, prioritizing, evaluating, and correcting problems. The inspectors also conducted a five-year review of the plant's service water system.
 - Operating Experience, Self-Assessments and Audits: The inspectors assessed the effectiveness of the station's processes for use of operating experience, audits, and self-assessments.
 - Safety Conscious Work Environment: The inspectors assessed the effectiveness of the station's programs to establish and maintain a safety-conscious work environment.

INSPECTION RESULTS

Assessment	71152B
<u>Effectiveness of Problem Identification</u> : Based on the samples reviewed, the team determined that the licensee's performance in this area adequately supported nuclear safety. Overall, the team found that the licensee was identifying and documenting problems at an appropriately low threshold that supported nuclear safety.	

Effectiveness of Prioritization and Evaluation of Issues: Overall, the team found that the licensee was appropriately prioritizing and evaluating issues to support nuclear safety. Of the samples reviewed, the team found that the licensee correctly characterized each condition report as to whether it represented a condition adverse to quality, and then prioritized the evaluation and corrective actions in accordance with program guidance.

Effectiveness of Corrective Actions: Overall, the team concluded that the licensee's corrective actions supported nuclear safety. Specifically, the Comanche Peak Nuclear Power Plant developed effective corrective actions for the problems evaluated in the corrective action program and generally implemented these corrective actions in a timely manner commensurate with their safety significance.

- As part of this inspection, the team selected the plant's service water system for a focused review within the corrective action program. For these systems, the team performed sample selections of condition reports, looking at the adequacy of the licensee's evaluation process for determining which items are placed in the corrective action process, and the corrective actions taken. The team also reviewed the licensee's use of operational experience and the Part 21 process' with respect to this system. As a result of the off-site nature of this inspection, due to COVID-19 restrictions at the time of the inspection, the team was not able to walk down portions of these systems. However, the team did not identify any concerns with this system that were not already being addressed by the station's monitoring and corrective action programs.

Corrective Action Program Assessment: Based on the samples reviewed, the team determined the licensee's corrective action program complied with regulatory requirements and self-imposed standards, and the licensee's implementation of the corrective action program adequately supported nuclear safety. The team found that management's oversight of the corrective action program process was effective.

Assessment

71152B

Operating Experience: The team reviewed a variety of sources of operating experience including Part 21 notifications and other vendor correspondence, NRC generic communications, and publications from various industry groups including Institute of Nuclear Power Operations (INPO) and Electric Power Research Institute (EPRI). The team determined that the Comanche Peak Nuclear Power Plant is adequately screening and addressing issues identified through operational experience that apply to the station and that this information is evaluated in a timely manner once it is received.

Self-Assessments and Audit Assessment: The team reviewed a sample of the licensee's departmental self-assessments and audits to assess whether they regularly identified performance trends and effectively addressed them. The team also reviewed audit reports to assess the effectiveness of assessments in specific areas. Overall, the team concluded that the licensee had an effective departmental self-assessment and audit process. The audits that the team reviewed were very detailed, thorough, and identified issues.

Assessment

71152B

Safety-Conscious Work Environment: The team interviewed eighteen individuals. The purpose of these interviews was (1) to evaluate the willingness of the licensee staff to raise

nuclear safety issues, either by initiating a Condition Report or by another method, (2) to evaluate the perceived effectiveness of the corrective action program at resolving identified problems, and (3) to evaluate the licensee's safety-conscious work environment (SCWE). The focus group participants were from the Instrumentation and Controls organization, and the Security organization. Due to the challenges brought on by the COVID-19 pandemic, and the Comanche Peak Nuclear Power Plant's performance in this area prior to this inspection, the NRC chose to limit the number of personnel interviewed. Overall, the Comanche Peak Nuclear Power Plant has an adequate Safety Conscious Work Environment.

Willingness to Raise Nuclear Safety Issues: In the assessed focus groups, the team found no evidence of challenges to SCWE. Individuals in these groups expressed a willingness to raise nuclear safety concerns and other issues through at least one of the several means available.

Overall, the team concluded that the Comanche Peak Nuclear Power Plant maintained a healthy SCWE.

Employee Concerns Program: The team inspected the Comanche Peak Nuclear Power Plant's Employee Concerns Program (ECP). The team interviewed the ECP manager and discussed her cases. The team reviewed the ECP's investigative packages. Overall, the team did not identify any concerns with the program. However, the location of the ECP office in the training facility was noted as being less visible. A number of the plant employees interviewed did not know where the ECP office was located.

EXIT MEETINGS AND DEBRIEFS

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

- On August 26, 2021, the inspectors presented the biennial problem identification and resolution inspection results to Tom McCool, Site Vice President and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152B	Calculations	ME-CA-0400-3218	Service Water Unit Cross Connect to Address Generic Letter 91-13	0
71152B	Calculations	ME-CA-0400-3218	Service Water Unit Cross Connect to Address Generic Letter 91-13	1
71152B	Corrective Action Documents	2014-011820, 2014-012160, 2015-008479, 2017-007987, 2017-012374, 2018-006530, 2018-006987, 2019-001866, 2019-003186, 2019-008106, 2019-008918, 2020-000875, 2020-000879, 2020-000960, 2020-004473, 2020-007895, 2020-008191, 2020-009151, 2021-001207, 2021-004605	TR's	2014-2021
71152B	Corrective Action Documents	2014-011820, 2015-005530, 2015-012009, 2017-000600, 2017-013591, 2017-001467, 2017-002409, 2017-006077, 2017-013347, 2018-005045, 2018-006407, 2018-006772, 2018-007969, 2018-008143, 2018-008646, 2019-001467, 2019-003669, 2019-006265, 2019-007855, 2019-007982, 2019-008039, 2019-008621, 2019-008800, 2019-009530, 2019-009542, 2020-000008, 2020-001086, 2020-001149, 2020-001177, 2020-001154, 2020-001272, 2020-001376, 2020-001429, 2020-001622, 2020-002283, 2020-003235, 2020-004449, 2020-004473, 2020-004772, 2020-005465, 2020-005963, 2020-006083, 2020-006129, 2020-006166, 2020-008037, 2020-008038, 2020-008090, 2020-008929, 2020-008963, 2020-009041, 2021-000135, 2021-001136, 2021-001230, 2021-001358, 2021-001393, 2021-001490, 2021-001493, 2021-001499, 2021-001500, 2021-001526, 2021-003086, 2021-003577, 2021-003742,	CR's	2014-2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		2021-004604, 2021-004621, 2021-004715, 2021-004729, 2021-004849, 2021-004850, 2021-004851, 2021-004852, 2021-004853, 2021-004855, 2021-004856, 2021-004857, 2021-004867, 2021-004868, 2021-004869, 2021-004870, 2021-004871, 2021-004872, 2021-004873, 2021-004874, 2021-004875, 2021-004876, 2021-004877, 2021-004878, 2021-004881, 2021-005026, 2021-006686, 2021-008092		
71152B	Corrective Action Documents	2019-007547, 2019-007982, 2019-008901, 2020-006801, 2020-008555-22	AI's	2019-2020
71152B	Corrective Action Documents	2020-007059, 2020-008429, 2020-009603, 2021-001551	EV-CR's	2020-2021
71152B	Corrective Action Documents Resulting from Inspection	2021-004849, 2021-005501	CR's	2021
71152B	Corrective Action Documents Resulting from Inspection	2021-005243, 2021-005251	TR's	2021
71152B	Corrective Action Documents Resulting from Inspection	IR-2021-005501		
71152B	Drawings	M1-0268	Flow Diagram Liquid Waste Processing Spent Resin Handling Subsystem	CP-26
71152B	Drawings	M1-0268, Sheet 1	Flow Diagram Liquid Waste Processing Disposal Subsystem	CP-16
71152B	Drawings	M2-0253	Flow Diagram Chemical and Volume Control System	CP-16
71152B	Drawings	SD-C-100551	3" Grinnell Nuclear Diaphragm	8

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Valve H.W.O-High Pressure	
71152B	Engineering Evaluations	FDA-2020-000100-01-00	Minimum Bend Radius for CP1-SWAPSW-02M Replacement Motor	
71152B	Miscellaneous	ECE-6.02-05-F2	Supplier Disposition Request	8
71152B	Miscellaneous	Form ECE-6.02-05-F2	Supplier Disposition Request	8
71152B	Procedures	210316	Nuclear Safety Culture Assessment	March 15, 2021
71152B	Procedures	ECE-5.08	Standard Design Process	4
71152B	Procedures	EGI-5.08-01	Final Design Authorizations	4
71152B	Procedures	STA-114	Employee Concerns and Employee Protection	4
71152B	Procedures	STA-422	Corrective Action Program	34
71152B	Procedures	STI-421.01	Initiation of Issue Reports	0
71152B	Procedures	STI-421.02	Issue Report Reviews	1
71152B	Procedures	STI-422.03	Performing Coaching and Investigations	3
71152B	Procedures	STI-422.04	Processing of Condition Reports	0
71152B	Procedures	STI-422.06	Performing Root Cause Analyses	0
71152B	Procedures	STI-424.01	Self-Assessment Program	2
71152B	Procedures	WHS-001	Receiving and Examination of Material, Parts, and Components	24
71152B	Procedures	WHS-002	Handling and Storage	18
71152B	Procedures	WHS-013	Processing of Inventory Documents	0
71152B	Self-Assessments	EVAL-2018-013	Performance Improvement	12/31/2018
71152B	Self-Assessments	EVAL-2019-009	Core Performance Engineering and Fuel Management	01/15/2020
71152B	Self-Assessments	EVAL-2020-001	Operations Training Program	03/19/2020
71152B	Self-Assessments	EVAL-2020-009	Work Management, Maintenance and Radiation Protection	
71152B	Work Orders	5598256		