



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

October 19, 2021

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – NRC
EXAMINATION REPORT 05000445/2021301 AND 05000446/2021301

Dear Mr. Peters:

On October 1, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an initial operator license examination at Comanche Peak Nuclear Power Plant, Units 1 and 2. The enclosed report documents the examination results and licensing decisions. The preliminary examination results were discussed on August 16, 2021, with you and other members of your staff. A telephonic exit meeting was conducted on October 1, 2021, with Mr. T. Morales, Training Director, who was provided the NRC licensing decisions.

The examination included the evaluation of six applicants for reactor operator licenses, two applicants for instant senior reactor operator licenses, and three applicants for upgrade senior reactor operator licenses. The license examiners determined that all of the applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued. There were no post-examination comments submitted by your staff. The enclosure contains details of this report.

No findings were identified during this examination.

K. Peters

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 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by George, Gerond
on 10/19/21

Gerond George, Chief
Operations Branch
Division of Reactor Safety

Dockets: 50-445; 50-446
Licenses: NPF-87; NPF-89

Enclosure:
Examination Report 05000445/2021301,
and 05000446/2021301
w/attachment: Supplemental
Information

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

Docket Numbers: 05000445, 05000446

License Numbers: NPF-87, NPF-89

Report Numbers: 05000445/2021301, 05000446/2021301

Enterprise Identifier: L-2021-OLL-0014

Licensee: Vistra Operations Company, LLC

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

Location: Glen Rose, Texas

Inspection Dates: August 9, 2021, to October 1, 2021

Inspectors: J. Kirkland, Chief Examiner, Senior Operations Engineer
C. Osterholtz, Senior Operations Engineer
B. Bergeon, Operations Engineer
M. Doyle, Operations Engineer
N. Hernandez, Operations Engineer
C. Steely, Health Physicist

Approved By: Gerond George, Chief
Operations Branch
Division of Reactor Safety

SUMMARY

Examination Report 05000445/2021301 and 05000446/2021301; August 9 – October 1, 2021; Comanche Peak Nuclear Power Plant, Units 1 and 2; Initial Operator Licensing Examination Report

The NRC examiners evaluated the competency of six applicants for reactor operator licenses, two applicants for instant senior reactor operator licenses and three applicants for upgrade senior reactor operator licenses at Comanche Peak Nuclear Power Plant, Units 1 and 2.

The licensee developed the examinations using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 11. The written examination was administered by the licensee on August 26, 2021. Due to issues with the Covid-19 pandemic, the NRC examiners administered two operating tests, on August 9 – 13, 2021, and September 22 – 23, 2021.

The NRC examiners determined that all applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued.

A. NRC-Identified and Self-Revealing Findings

None.

B. Licensee-Identified Violations

None.

REPORT DETAILS

OTHER ACTIVITIES – INITIAL LICENSE EXAM

.1 License Applications

a. Scope

The NRC examiners reviewed all license applications submitted to ensure each applicant satisfied relevant license eligibility requirements. The NRC examiners also audited three of the license applications in detail to confirm that they accurately reflected the subject applicant's qualifications. This audit focused on the applicant's experience and on-the-job training, including control manipulations that provided significant reactivity changes.

b. Findings

No findings were identified.

.2 Examination Development

a. Scope

The NRC examiners reviewed integrated examination outlines and draft examinations submitted by the licensee against the requirements of NUREG-1021. The NRC examiners conducted an onsite validation of the operating tests.

b. Findings

The NRC examiners provided outline, draft examination, and post-validation comments to the licensee. The licensee satisfactorily completed comment resolution prior to examination administration.

The Reactor Operator (RO) and Senior Reactor Operator (SRO) written examinations were determined to be outside of the acceptable quality range as identified in NUREG-1021. For the RO portion - 20 questions (27 percent) required significant modification or were replaced as result of the NRC examiner review. For the SRO portion – 7 questions (28 percent) required significant modification or were replaced as a result of the NRC examiner review.

Flaws included insufficient question-to-randomly selected KA statement match, questions containing more than one correct answer, and non-credible distractors. Future written examination submittals need to incorporate lessons learned.

The operating tests initially submitted by the licensee were within the range of acceptability expected for a proposed examination.

.3 Operator Knowledge and Performance

a. Scope

On August 26, 2021 the licensee proctored the administration of the written examinations to all applicants. The licensee staff graded the written examinations, analyzed the results, and presented their analysis and post-examination comments to the NRC on September 24, 2021.

The NRC examination team administered the various portions of the operating tests to nine applicants from August 9 – 13, 2021, and a different operating test to two applicants from September 22 – 23, 2021.

b. Findings

No findings were identified.

All applicants passed the written examination and all parts of the operating test. The final examinations and post-examination analysis and comments may be accessed in the ADAMS system under the accession numbers noted in the attachment.

The examination team noted no generic weaknesses associated with applicant performance on the operating tests. Post-examination analysis revealed one generic weakness associated with applicant performance on the written examination. The applicants displayed a weakness associated with performing a calorimetric with the Leading Edge Flow Meter out of service. This weakness was captured in the licensee's corrective action program as Incident Report IR-2021-005761. Copies of all individual examination reports were sent to the facility Training Manager for evaluation and determination of appropriate remedial training.

.4 Simulation Facility Performance

a. Scope

The NRC examiners observed simulator performance with regards to plant fidelity during examination validation and administration.

b. Findings

No findings were identified.

.5 Examination Security

a. Scope

The NRC examiners reviewed examination security for examination development during both the onsite preparation week and examination administration week for compliance with 10 CFR 55.49 and NUREG-1021. Plans for simulator security and applicant control were reviewed and discussed with licensee personnel.

Findings

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

Exit Meeting Summary

The chief examiner presented the preliminary examination results to you and other members of the staff on August 16, 2021. A telephonic exit was conducted on October 1, 2021, between Mr. J. Kirkland, Chief Examiner, and Mr. T. Morales, Training Director.

The licensee did not identify any information or materials used during the examination as proprietary.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

T. Morales, Training Director

J. Ruby, Examination and Simulator Supervisor

NRC Personnel

J. Elgood, Senior Resident Inspector

N. Day, Resident Inspector

ADAMS DOCUMENTS REFERENCED

Accession No. ML21285A038 - FINAL WRITTEN EXAMS

Accession No. ML21285A037 - FINAL OPERATING TEST

Accession No. ML21285A039 - POST-EXAMINATION ANALYSIS-COMMENTS

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 - NRC EXAMINATION
 REPORT 05000445/2021301; 05000446/2021301 - DOCUMENT DATE OCTOBER 19, 2021

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ADAMS ACCESSION NUMBER: ML21285A271

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