



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

December 14, 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 – SECURITY
BASELINE INSPECTION REPORT 05000445/2021405 AND 05000446/2021405

Dear Mr. Peters:

On December 2, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2, and discussed the results of this inspection with Mr. J. Drefuss, Director, Organizational Effectiveness, and other members of your staff. The results of this inspection are documented in the enclosed report.

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,

A handwritten signature in blue ink that reads "Gregory E. Werner".

Signed by Werner, Gregory
on 12/14/21

Gregory E. Werner, Chief
Reactor Projects Branch B
Division of Reactor Projects

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 – SECURITY BASELINE
INSPECTION REPORT 05000445/2021405 AND 05000446/2021405 – DECEMBER 14, 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: 05000445/2021405 and 05000446/2021405

Enterprise Identifier: I-2021-405-0006

Licensee: VISTRA Operating Company, LLC

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

Location: Glen Rose, TX 76043

Inspection Dates: November 15, 2021 to December 2, 2021

Inspectors: N. Day, Resident Inspector
J. Ellegood, Senior Resident Inspector

Approved By: Gregory E. Werner, Chief
Reactor Projects Branch B
Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline 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) 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." 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.

SAFEGUARDS

71130.14 - Review of Power Reactor Target Sets

The inspectors evaluated the Security Target Set Program. The following elements were evaluated:

Review of Power Reactor Target Sets (1 Sample)

- Events and Logs
- Target Set Identification and Development Process Review – except Item 02.02 f. due to no temporary or permanent changes to target sets from previous inspection
- Verification of Target Sets Changes
- Verification of Complete and Accurate Target Sets
- Physical Protection Program Reviews

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On December 2, 2021, the inspectors presented the security baseline inspection results to Mr. J. Dreyfuss, Director, Organizational Effectiveness, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.14	Corrective Action Documents	TR-YYYY-NNNN	2021-007656, 2020-005649, 2020-004947, 2020-007105, 2018-005372, 2018-003865	
	Miscellaneous		Timelines	09/22/2021
			Safeguards Event Logs	10/01/2020 - 09/30/2021
			Target Sets, July 28, 2020, Target Sets, June 12, 2019, Target Set Worksheets A-I, July 28, 2020	
		CSi-201-3-DG-U1X	Critical Digital Asset Determination List	2
		CSI-201-3-DG-U2	Critical Digital Asset Determination List	2
		SEC-119	Protective Strategy	17
	Procedures	ABN-915	Security Events	19
		LFE-2.0	Control Room Response to Armed Assault	0
		SEC-117	Protective Strategy and Target Set Development	5