



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

April 25, 2022

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – SECURITY
BASELINE INSPECTION REPORT 05000445/2022402 AND 05000446/2022402

Dear Mr. Peters:

On March 24, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2 and, the NRC inspector discussed the results of this inspection with Mr. John Dreyfuss, 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,

 Signed by Kellar, Ray
on 04/25/22

Ray L. Kellar, P.E., Chief
Plant Support Branch
Division of Radiological Safety & Security

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 05000445/2022402 AND 05000446/2022402-DATED APRIL 25, 2022

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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: 05000445/2022402 and 05000446/2022402

Enterprise Identifier: I-2022-402-0000

Licensee: VISTRA Operating Company, LLC

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

Location: Glen Rose, TX

Inspection Dates: March 21, 2022 to March 24, 2022

Inspector: J. Buchanan, Physical Security Inspector

Accompanied By: T. Weir

Approved By: Ray L. Kellar, P.E., Chief
Plant Support Branch
Division of Radiological Safety & Security

Enclosure

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 inspector 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

71130.02 - Access Control

The inspector evaluated the access control program through completion of the following inspection elements:

Access Control (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: All Requirements
 - Tier III: All Requirements

71130.09 - Security Plan Changes

The inspector evaluated the security plan changes through completion of the following procedure elements:

Security Plan Changes (1 Sample)

- (1) Since the last NRC inspection of this program area, Comanche Peak Nuclear Power Plant Unit 1 and 2 Security Plan Revision 14 was implemented based on the licensee's determination, in accordance with 10 CFR 50.54(p)(2), that the changes resulted in no decrease in safeguards effectiveness of the security plan, and that the revised security plan changed continues to meet the requirements of 10 CFR 73.55(b). The inspector conducted a review of the security plan changes to evaluate for potential decrease in safeguards effectiveness of the security plan. However, this review does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspector verified licensee performance indicators submittals listed below:

PP01: Protected Area Security Equipment Performance Index Sample (IP Section 02.17) (1 Sample)

(1) **January 1, 2021 through December 31, 2021**

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On March 24, 2022, the inspector presented the security baseline inspection results to Mr. John Dreyfuss, Director, Organizational Effectiveness, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Corrective Action Documents	CR-2021-003925, CR-2021-003994, CR-2021-005404, CR-2021-005889, CR-2021-007969, CR-2021-008040, CR-2022-000206, CR-2022-001393, CR-2022-001404, and CR-2022-001626 IR-2022-001623 and IR-2022-001883 TR-2021-002424, TR-2021-007195, TR-2021-007509, TR-2021-007771, TR-2021-008562, TR-2022-000869, and TR-2022-001254		
	Corrective Action Documents Resulting from Inspection	CR-2022-001933, IR-2022-001883, IR-2022-002023, IR-2022-002-25, AND TR-2022-001943.		
	Miscellaneous	209 Nuclear Policy Statement	Prohibited and Controlled Items and Site Photography	12/30/2018

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Job Aid	PADS Check for Visitor Processing	12/16/2021
		Security Field Reports	0077-22, 0085-22, 0088-22, 0098-22, 0153-21, 0263-21, 0267-21, 0353-21, 0479-21, 0505-21, 0528-21, and 0557-21	
	Procedures	3.11 Security Instruction	Key Control	26
		3.11 Security Instruction	Key Control	25
		3.16 Security Instruction	Portable Explosive Detector Searches	13
		3.2 Security Instruction	Access Control	68
		4.0 Security Instruction	Compensatory Measures	31
		SEC-201	Security Procedures During Refueling and Major Maintenance Operations	12
		SEC-302	Personnel Identification, Key Card Badge Issuance and Access Control	20
		SEC-304	Vehicle and Material Control	18
		SEC-306	Lock, Key, Password, Combinations and Key Card Badge Control System	28
		SEC-506	Security Equipment Maintenance, Testing, and Calibration	38
		STA-308	Protection of Safeguard Information and Other Controlled Information Types	16
STA-902	Access to CPNPP Site Areas	26		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		STA-904	Vehicle and Material/Package Control	17
	Self-Assessments	IR-2022-001154	Security Access Control Self-Assessment	
	Work Orders	5927722		
71130.09	Miscellaneous	50.54 (P)	Site-Specific Analysis	03/29/2016
		50.54 (P)	Site-Specific Analysis	03/16/2022
		Regulatory Analysis	SAP Staffing Requirements	04/19/2015
		Security Plan	Comanche Peak Nuclear Power Plant Unit 1 and 2 Security Plan	13
		Security Plan	Comanche Peak Nuclear Power Plant Unit 1 and 2 Security Plan	14