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

November 1, 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 INTEGRATED INSPECTION REPORT 05000445/2022003 AND 05000446/2022003 AND NOTICE OF VIOLATION

Dear Mr. Peters:

On September 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2. On October 6, 2022, the NRC inspectors discussed the results of this inspection with Mr. A. Marzloff, Plant Manager, and other members of your staff. The results of this inspection are documented in the enclosed report.

The enclosed report discusses a Severity Level IV violation. The NRC evaluated this violation in accordance with section 2.3.2 of the NRC Enforcement Policy, which can be found at http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html. The violation is cited in Enclosure 1, Notice of Violation (Notice), and the circumstances surrounding it are described in detail in the subject inspection report (Enclosure 2). We determined that this violation did not meet the criteria to be treated as a non-cited violation (NCV) because your staff failed to restore compliance within a reasonable period after the violation was identified consistent with section 2.3.2 of the NRC Enforcement Policy. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC's review of your response will also determine whether further enforcement action is necessary to ensure your compliance with regulatory requirements.

Additionally, one finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as an NCV consistent with section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional

Administrator, Region IV; the Director, Office of Enforcement; and the NRC Resident Inspector at Comanche Peak Nuclear Power Plant, Units 1 and 2.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; and the NRC Resident Inspector at Comanche Peak Nuclear Power Plant, Units 1 and 2.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, any response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

Sincerely,

Signed by Werner, Gregory
on 11/01/22

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

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

Enclosures:
1. Notice of Violation
2. Inspection Report 05000445/2022003
and 05000446/2022003

cc w/ encl: Distribution via LISTSERV

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 INTEGRATED INSPECTION REPORT 05000445/2022003 AND 05000446/2022003 AND NOTICE OF VIOLATION DATED NOVEMBER 1, 2022

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Non-Public Designation Category: MD 3.4 Non-Public _____ (A.3 - A.7 or B.1)
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☐ SUNSI Review		X Non-Sensitive ☐ Sensitive		X Publicly Available ☐ Non-Publicly Available	
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NOTICE OF VIOLATION

Vistra Operations Company, LLC
Comanche Peak Nuclear Power Plant, Unit 1

Docket No. 50-445
License No. NPF-87

During an NRC inspection conducted from June 1 to September 30, 2022, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

> Title 10 of the *Code of Federal Regulations* (10 CFR) 50.59(c)(2) requires, in part, that a licensee shall obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change if the change would: result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important-to-safety previously evaluated in the final safety analysis report (as updated); or, create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report (as updated).
>
> Contrary to the above, from February 13, 2019, to September 30, 2022, the licensee failed obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change if the change that would: result in more than a minimal increase in the likelihood of occurrence of a malfunction of a SSC important-to-safety previously evaluated in the final safety analysis report (as updated); or, create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report (as updated). Specifically, the licensee revised the Final Safety Analysis Report associated with the Unit 1 DC power system to change the facility's commitments to NRC Regulatory Guide (RG) 1.81, which demonstrated compliance with General Design Criterion 5, without obtaining a license amendment.

This is a Severity Level IV violation (Enforcement Policy Section 6.1.d.4).

Pursuant to the provisions of 10 CFR 2.201, Vistra Operations Company, LLC., is hereby required to submit a written statement or explanation to U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011-4511, and a copy to the NRC resident inspector at Comanche Peak Nuclear Power Plant, Units 1 and 2, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a “Reply to a Notice of Violation” and should include for the violation: (1) the reason for the violation or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html, to the extent possible, it should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

Dated this 1st day of November, 2022

U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000445 and 05000446
License Numbers:	NPF-87 and NPF-89
Report Numbers:	05000445/2022003 and 05000446/2022003
Enterprise Identifier:	I-2022-003-0003
Licensee:	Vistra Operations Company, LLC
Facility:	Comanche Peak Nuclear Power Plant, Units 1 and 2
Location:	Glen Rose, TX 76043
Inspection Dates:	June 1 to September 30, 2022
Inspectors:	R. Alexander, Regional State Liaison Officer J. Braisted, Senior Reactor Inspector D. Bryen, Reactor Inspector N. Day, Resident Inspector J. Ellegood, Senior Resident Inspector G. George, Senior Reactor Inspector R. Kopriva, Senior Reactor Inspector D. Reinert, Reactor Inspector H. Strittmatter, Emergency Preparedness Inspector
Approved By:	Gregory E. Werner, Chief Projects Branch B Division of Operating Reactor Safety

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated 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

Failure to Restore Compliance for Non-Cited Violation 05000445/2019001-02 "Failure to Evaluate a Change to the Facility DC Power System"			
Cornerstone	Severity	Cross-Cutting Aspect	Report Section
Not Applicable	Severity Level IV NOV 05000445/2022003-01 Open	Not Applicable	71111.17T
The inspectors identified a Severity Level IV, notice of violation of 10 CFR 50.59, "Changes, tests, and experiments," for the failure to restore compliance of previously identified non-cited violation 05000445/2019001-02. The previous violation identified the licensee's failure to obtain a license amendment or perform a written evaluation demonstrating the basis for not obtaining a license amendment prior to making a change to the facility as described in the Final Safety Analysis Report. Specifically, the licensee revised the Final Safety Analysis Report to change the facility's commitments to NRC Regulatory Guide 1.81, which demonstrated compliance with General Design Criterion 5, without obtaining a license amendment.			

Degraded Emergency Response Facility Communications Capabilities			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Emergency Preparedness	Green NCV 05000445,05000446/2022003-02 Open/Closed	[P.3] - Resolution	71152A
The inspectors identified a Green finding and associated non-cited violation of 10 CFR 50.47(b)(6) when the licensee failed to ensure prompt communications among principal response organizations were available from the main control room. Specifically, on March 21, 2022, due to a loss of internet and degraded backup communication methods, there were no communication methods available from within the main control room to contact offsite response organizations.			

Additional Tracking Items

None.

PLANT STATUS

On September 5, Unit 1 tripped due to a trip of the main turbine from 100 percent power. The licensee corrected the issue causing the trip and restarted Unit 1 on September 12, 2022. Unit 1 returned to 100 percent on September 15, 2022.

Unit 2 remained at or near rated thermal power for the entire assessment period.

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 performed activities described in IMC 2515, Appendix D, "Plant Status," observed risk significant activities, and completed on-site portions of IPs. 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.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Impending Severe Weather Sample (IP Section 03.02) (1 Sample)

(1) High winds and drought conditions contributed to wildfires that came within three miles of the plant on July 19, 2022.

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

(1) Unit 1, diesel generators diesel and exhaust systems on July 20, 2022
(2) fire pumps on July 22, 2022
(3) independent spent fuel storage installation on July 30, 2022
(4) Unit 2, train A diesel generator starting air system on September 1, 2022

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated system configurations during a complete walkdown of the Unit 2 containment spray A system on August 4, 2022.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

(1) Unit 2, trains A and B component cooling water pumps on August 8, 2022
(2) Units 1 and 2, component cooling water heat exchanger room on August 8, 2022
(3) Unit 1, emergency diesel generator 1-01 room and fuel oil day tank 1-01 room on September 26, 2022
(4) Unit 1, emergency diesel generator 1-02 room and fuel oil day tank 1-02 room on September 26, 2022
(5) Unit 1, charging pump rooms on September 29, 2022

Fire Brigade Drill Performance Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the onsite fire brigade training and performance during an unannounced fire drill on September 2, 2022.

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (2 Samples)

The inspectors evaluated internal flooding mitigation protections in the:

(1) Unit 2, feedwater enclosures
(2) 25KV power cable vaults supplying independent spent fuel storage installation power

71111.07T - Heat Exchanger/Sink Performance

Heat Exchanger (Service Water Cooled) (IP Section 03.02) (1 Sample)

The inspectors evaluated heat exchanger performance on the following:

(1) component cooling water pump lube oil cooler 1-02

Heat Exchanger (Closed Loop) (IP Section 03.03) (2 Samples)

The inspectors evaluated heat exchanger performance on the following:

(1) motor driven auxiliary feedwater pump room fan cooler 1-07
(2) residual heat removal pump room fan cooler 2-01

Ultimate Heat Sink (IP Section 03.04) (1 Sample)

The inspectors evaluated the ultimate heat sink performance on the following:

(1) ultimate heat sink and service water system

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

(1) The inspectors observed and evaluated licensed operator performance in the control room during plant cooldown to 205 degrees Fahrenheit on September 7, 2022.

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

(1) The inspectors observed and evaluated a simulated control room fire and plant shutdown on August 9, 2022.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components (SSCs) remain capable of performing their intended function:

(1) Units 1 and 2, 6.9 kilovolt distribution system.
(2) Unit 2, turbine control system.

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (6 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

(1) Unit 1, risk controls associated with feedwater heater outlet pressure transmitter 0508 card replacement on July 17, 2022
(2) Unit 1, operator actions to maintain availability of the turbine driven auxiliary feedwater pump 1-01 on August 4, 2022
(3) Unit 1, flooding, and operator response due to circulating water lube water pumps 1-01 and 1-02 flooding on August 9, 2022
(4) Unit 1, forced outage risk for the week of September 5, 2022
(5) Unit 1, startup risk on September 11 and 12, 2022
(6) Unit 1, risk during emergent motor driven feedwater pump 1-01 recirculation line leak on September 15, 2022.

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (5 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

(1) Unit 2, pressurizer heaters per condition report 2022-5808
(2) Unit 1, pressurizer master controller 1-PK-455A per condition report 2022-005681
(3) Unit 1, turbine driven and motor driven feedwater pump 1-02 per condition report 22-006748
(4) Unit 1, emergency diesel generator 1-02 starting air receiver 1-03 leaking by valve 1DO-0041 per condition reports 21-008182 and 22-006804
(5) Unit 2, tornado door per tracking report 2022-006923.

71111.17T - Evaluations of Changes, Tests, and Experiments

Sample Selection (IP Section 02.01) (27 Samples)

The inspectors reviewed the following evaluations, screenings, and/or applicability determinations for 10 CFR 50.59 from [enter dates].

(1) EV-CR-2019-000901-2, “Replace Units 1 and 2 Diesel Generator Starting Air Compressors”
(2) EV-CR-2022-005805-8, “Comp Action to Intermittently Isolate 1-HV-4393, Diesel Generator, Service Water Outlet Flow Valve”
(3) EV-IR-2021-003710-1, “Shift Manager Clearance SMP21-0016 STA-707 Review
(4) EV-TR-2019-001133-5, FDA-2019-000036-01 / TM 5735389”
(5) EV-TR-2019-009096-1, “Maintenance Clearance TR-2019-009096 Spent Fuel Pool X-02 Ventilation Exhaust Fan X-35 Motor”
(6) EV-TR-2020-005137-11, “Containment Building Polar Crane Use During Modes 3 Through 4”
(7) EV-TR-2020-007888-3, “Lubrication Recommendation Change to the Station Service Water Pump Motor 1-02 Lower Bearing Grease”
(8) EV-TR-2021-002308-9, “Plugging up to 65 Tubes in the Unit 1 & Unit 2 CCW HXs (CP1/2-CCAHHX-01/-02)”
(9) EV-TR-2021-003204-1, “Maintenance Clearance Greater Than 90 Days on CPX-WTPMWP-01 Water Treatment Waste Sump X-01”
(10) EV-IR-2021-003254-1, “Comp Action Evaluation for Monitoring RCP 1-03 Vibration
(11) EV-TR-2019-000777-6, VDRT 5775695, Westinghouse Calculation CN-PCSA-14-5, Revision 2”
(12) EV-CR-2019-003377-8, “Change Control Room A/C Units (CRAC) Compressor Suction Pressure Pumpdown Setpoint to greater than or equal to 45 psig”
(13) EV-TR-2020-003698-5, “Shift Manager Clearance Placed to Isolate 2-HV-4166 Leaking By”
(14) EV-TR-2021-000607-1, “Maintenance Clearance CP20-1066 Unit 2 Train A UPS Room Fan Coil Unit CP2-VAAUPR-01”

(15) EV-TR-2019-06006-15, “Application of WCAP-17627, Revision 1, to Unit 2 Reload Analyses, beginning with Unit 2 Cycle 19 and Subsequent Unit 1 and Unit 2 Reload Analyses (50.59 Safety Evaluation)”

(16) EV-TR-2019-007450-4, “Procedure Revision - Response to a Fire in the Control Room or Cable Spreading Room”
(17) EV-CR-2020-009014-1, “Unit 1 Turbine Shaft Displacement Channel 1 Defective Components”
(18) EV-CR-2019-004542-5, “Perform STA-707”
(19) EV-CR-2020-005070-11, “Compensatory Action: Manually Purging of Safety Chiller
(20) EV-CR-2021-002241-3, XEB4-2/1SS Motor Control Center Transfer Switch Maintained in Off Position”
(21) EV-CR-2020-002810-9, “Unit 2 Train B Core Exit Thermocouple Alternate Temperature Monitoring”
(22) EV-TR-2020-002067-7, “Manual Control Rod Drop Timing”
(23) EV-TR-2019-008867-1, “Degraded RCP Seal Standpipe Level Control Valve on Reactor Coolant Pumps 2-01 and 2-03”
(24) EV-CR-2018-004605-4, “Component Cooling Water Pump Shaft Bearing Diameter and Tolerance Changes”
(25) 59SC-2017-000182-01, “Increase Time Delay for Reactor Coolant Pump Vibration Alarm”
(26) 59SC-2019-000025-01, “Replace Alternate Power Diesel Generators”
(27) 59SC-2019-000051-01, “Motor Operated Valve Limit Switch Setting Modifications”

71111.18 - Plant Modifications

Severe Accident Management Guidelines (SAMG) Update (IP Section 03.03) (1 Sample)

(1) The inspectors verified the site Severe Accident Management Guidelines were updated in accordance with the pressurized water reactor generic severe accident technical guidelines and validated in accordance with NEI 14-01, “Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents,” revision 1.

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (6 Samples)

The inspectors evaluated the following post-maintenance testing activities to verify system operability and/or functionality:

(1) Unit 1, pressure transmitter 0508 feedwater heater outlet header pressure transmitter following card replacement per work order 22-345906
(2) Unit 1, repairs to turbine shaft displacement probes between per work order 22-448268
(3) Unit 1, pressurizer heater control 1-PK-455A per work order 22-381599
(4) Unit 2, pressurizer heater control 2-PK-455A per work order 22-394264
(5) Unit 1, motor driven auxiliary feedwater pump 1-01 recirculation line leak repair per work order 22-457619
(6) Unit 1, main feedwater pump 1B following servo replacement per work orders 22-456325 and 22-456467

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage Sample (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated a forced outage between September 6 and 12, 2022 caused by a unit trip. The unit trip resulted from a turbine trip caused by a spurious shaft displacement indication.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance testing activities to verify system operability and/or functionality:

Surveillance Tests (other) (IP Section 03.01) (4 Samples)

(1) Unit 2, pressurizer heater per procedure IPO-001B on December 1, 2021
(2) Unit 1, pressurizer heaters per procedure IPO-001A on May 8, 2022
(3) Unit 2, condensate storage tank inspection on August 23, 2022
(4) Unit 1, scram breaker testing on September 12, 2022.

71114.01 - Exercise Evaluation

Inspection Review (IP Section 02.01-02.11) (1 Sample)

(1) The inspectors evaluated the biennial emergency plan exercise conducted on July 26 and 27, 2022. The exercise scenario simulated a greater than Operating Basis Earthquake seismic event resulting in several simulated in-plant failures requiring the rapid escalation to a Site Area Emergency declaration due the loss of all cooling water flow to the secondary heat sink. Though the scenario did not include a radiological release requiring issuance of protective action recommendations to the offsite authorities, it did include opportunities for the licensee emergency response organization to mitigate and repair additional simulated failures in electrical switchgear and respond to a simulated medical emergency. The licensee's exercise activities during the week also included a separate emergency scenario which required the licensee demonstrate of one of the station's extensive damage mitigation guideline strategies, per the requirements of 10 CFR 50.155(b)(2), in mitigating the loss of the spent fuel pool water inventory.

71114.04 - Emergency Action Level and Emergency Plan Changes

Inspection Review (IP Section 02.01-02.03) (1 Sample)

(1) The inspectors evaluated the following submitted Emergency Action Level and Emergency Plan changes.

- ANS (Alert and Notification System) Design Report, revision 2, change 1 -effective March 11, 2021
- On-Shift Staffing Analysis, revision 1 - effective June 24, 2021
- Emergency Plan, revision 45 - effective June 15, 2022.

This evaluation does not constitute NRC approval.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

MS06: Emergency AC Power Systems (IP Section 02.05) (2 Samples)

(1) Unit 1 (July 1, 2021, through June 30, 2022)
(2) Unit 2 (July 1, 2021, through June 30, 2022)

MS07: High Pressure Injection Systems (IP Section 02.06) (2 Samples)

(1) Unit 1 (July 1, 2021, through June 30, 2022)
(2) Unit 2 (July 1, 2021, through June 30, 2022)

MS09: Residual Heat Removal Systems (IP Section 02.08) (2 Samples)

(1) Unit 1 (July 1, 2021, through June 30, 2022)
(2) Unit 2 (July 1, 2021, through June 30, 2022)

BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (2 Samples)

(1) Unit 1 (July 1, 2021, through June 30, 2022)
(2) Unit 2 (July 1, 2021, through June 30, 2022)

BI02: RCS Leak Rate Sample (IP Section 02.11) (2 Samples)

(1) Unit 1 (July 1, 2021, through June 30, 2022)
(2) Unit 2 (July 1, 2021, through June 30, 2022)

EP01: Drill/Exercise Performance (DEP) Sample (IP Section 02.12) (1 Sample)

(1) April 1, 2021, through June 30, 2022

EP02: Emergency Response Organization (ERO) Drill Participation (IP Section 02.13) (1 Sample)

(1) April 1, 2021, through June 30, 2022

EP03: Alert and Notification System (ANS) Reliability Sample (IP Section 02.14) (1 Sample)

(1) April 1, 2021, through June 30, 2022

71152A - Annual Follow-up Problem Identification and Resolution

Annual Follow-up of Selected Issues (Section 03.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

(1)
- loss of internet in the main control room and the impact on Emergency Plan communication equipment

71153 - Follow Up of Events and Notices of Enforcement Discretion

Event Followup (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated a Unit 1 trip and licensee's response on September 5 and 6, 2022.

INSPECTION RESULTS

Failure to Restore Compliance for Non-Cited Violation 05000445/2019001-02 "Failure to Evaluate a Change to the Facility DC Power System"			
Cornerstone	Severity	Cross-Cutting Aspect	Report Section
Not Applicable	Severity Level IV NOV 05000445/2022003-01 Open	Not Applicable	71111.17T
The inspectors identified a Severity Level IV, notice of violation (NOV) of 10 CFR 50.59, "Changes, tests, and experiments," for the failure to restore compliance of previously identified non-cited violation (NCV) 05000445/2019001-02. The previous violation identified the licensee's failure to obtain a license amendment or perform a written evaluation demonstrating the basis for not obtaining a license amendment prior to making a change to the facility as described in the final safety analysis report. Specifically, the licensee revised the Comanche Peak Final Safety Analysis Report (FSAR) to change the facility's commitments to NRC Regulatory Guide (RG) 1.81, which demonstrated compliance with General Design Criterion 5, without obtaining a license amendment.			

Description: The inspectors reviewed corrective actions associated with NCV 05000445/2019001-02. Through review of the associated condition reports (CR) 2019-001711 and CR-2019-004542, the inspectors identified that the licensee did not restore compliance with the requirements of 10 CFR 50.59, "Change, tests, and experiments." Specifically, the licensee failed to correct the NCV when they closed corrective actions for the violation without obtaining a license amendment.

In January 2000, the licensee discovered electrical power panels that shared safety-related alternating current and direct current electrical power between Units 1 and 2, contrary to what was described in the Comanche Peak FSAR and NUREG-0797, "Safety Evaluation Report related to the Operation of Comanche Peak Steam Electric Station, Units 1 and 2, Docket Nos. 50-445 and 50-446, Supplement 22." The licensee took corrective action to modify the plant and revise the FSAR description of their original commitments to NRC RG 1.81, "Shared Emergency and Shutdown Electric Systems for Multi-Unit Nuclear Power Plants."

RG 1.81 was used by the licensee to comply with General Design criterion 5, “Sharing of structures, systems, and components.”

In April 2002, the licensee issued 10 CFR 50.59 screening document 59SC-2000-000142-02-02 which changed the description of RG 1.81 commitments in the FSAR. The licensee was originally committed to positions C.1 and C.3 of RG 1.81, which describes that there was no sharing of emergency power sources between units. The 10 CFR 50.59 screening document changed the description of the licensee’s commitment to position C.2 of RG 1.81, which allowed sharing of emergency power sources given specific conditions. Specifically, position C.2 applied only to plants under construction permits issued before June 1, 1973, and the position was NRC reviewed on an individual case basis. The change was “screened-out” of the 10 CFR 10.59 process and no license amendment was submitted.

The inspectors determined that the licensee inappropriately applied position C.2 of RG 1.81 because the Comanche Peak construction permit was issued after June 1, 1973, and Comanche Peak was originally evaluated against position C.3 of RG 1.81. The inspectors determined these were changes to commitments that were used to meet General Design Criteria 5. Additionally, the unit specific loads on the common unit panels could result in new failure modes for previously evaluated accidents.

The inspectors reviewed 10 CFR 50.59 guidance as documented in NEI 96-07, revision 1, “Guidelines for 10 CFR 50.59 Implementation,” as endorsed by NRC RG 1.187, revision 3, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments." Based on this determination, the inspectors determined that the 10 CFR 50.59 screening document should have “screened” to a 10 CFR 50.59 evaluation. Further, the 10 CFR 50.59 safety evaluation would have determined that the licensee was required to submit a license amendment for the change because the change resulted in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety previously evaluated in the final safety analysis report. Additionally, the change created a possibility for a malfunction of a structure, system, or component important to safety with a different result than any previously evaluated in the final safety analysis report.

Corrective Actions: The licensee entered the issue into the corrective action program. There are no operability concerns because the licensee corrected the technical aspects of the issue in previous corrective actions.

Corrective Action References: CR 2019-001711, CR-2019-003684, CR-2019-004542, CR-2019-006767, CR-2022-006915, CR-2022-006916

Performance Assessment: The inspectors determined this violation was associated with a minor performance deficiency.

Enforcement: The reactor oversight processes significance determination process does not specifically consider the regulatory process impact in its assessment of licensee performance. Therefore, it is necessary to address this violation which impedes the NRC’s ability to regulate using traditional enforcement to adequately deter non-compliance.

Severity: The violation was determined to be Severity Level IV using Section 6.1.d.4 of the NRC Enforcement Policy, dated January 14, 2022. Specifically, it was a violation of 10 CFR 50.59 because the change required prior Commission review and approval, and the violation was determined to be associated with a minor performance deficiency.

Violation: Title 10 CFR 50.59(c)(2) requires, in part, that a licensee shall obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change if the change would: result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important-to-safety previously evaluated in the final safety analysis report (as updated); or, create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report (as updated).

Contrary to the above, from February 13, 2019, to September 30, 2022, the licensee failed obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change if the change that would: result in more than a minimal increase in the likelihood of occurrence of a malfunction of a SSC important-to-safety previously evaluated in the final safety analysis report (as updated); or, create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report (as updated). Specifically, the licensee revised the Final Safety Analysis Report associated with the Unit 1 DC power system to change the facility's commitments to NRC Regulatory Guide (RG) 1.81, which demonstrated compliance with General Design Criterion 5, without obtaining a license amendment.

Enforcement Action: This violation is being cited because the licensee failed to restore compliance within a reasonable period after the violation was identified consistent with section 2.3.2 of the Enforcement Policy.

Degraded Emergency Response Facility Communications Capabilities			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Emergency Preparedness	Green NCV 05000445,05000446/2022003-02 Open/Closed	[P.3] - Resolution	71152A
The inspectors identified a Green finding and associated non-cited violation of 10 CFR 50.47(b)(6) when the licensee failed to ensure prompt communications among principal response organizations were available from the main control room. Specifically, on March 21, 2022, due to a loss of internet and degraded backup communication methods, there were no communication methods available from within the main control room to contact offsite response organizations.			

Description: On March 21, 2022, Comanche Peak experienced a loss of internet at the site. This loss created degradation of communications in multiple emergency response facilities, especially the main control room. The main control room has multiple methods of communication available to communicate to various onsite, offsite, stakeholders, and the NRC as described in section 4.0 of the Emergency Plan. Since many of the methods rely on internet (e.g., voice over internet protocol (VOIP)) technology, the dependent communication methods that relied upon internet were rendered non-functional. Table 4.1 in the Emergency Plan illustrates the communication interfaces from Comanche Peak's facilities to the other onsite/offsite facilities and response organizations with the different communication methods available. The inspectors discussed available communications methods with licensee staff and were informed that no communications methods were available in the control room without breaching the control room envelope.

The unplanned loss of internet on March 21, 2022, lasted approximately one hour. The inspectors noted that from March 10 through April 18, 2022, there were a total of five instances of the loss of all internets at the site ranging from one hour to seventeen hours; however, aside from the March 21, 2022, instance, some form of emergency communications was available from within the control room. Furthermore, the inspectors noted there were multiple loss of internet occurrences in 2021. However, the loss of internet occurrence on March 21, 2022, was the most significant due to the contributing factors affecting the other methods of communication concurrent with that loss. Specifically, the following methods were affected; all commercial telephones due to their reliance on VOIP, the emergency notification number due to its reliance on VOIP, the black start satellite phone (which is antenna wired capable for control room use) due to inadequate instructions, VESTA online notification program (notifies state/local authorities) due to its reliance on internet, and the land line telephone system (copper based redundant telephone lines) due to degraded connection and static. The individuals in the control room were left with no methods to make phone calls from the control room envelope; however, the black start satellite phone could receive calls.

On March 21, 2022, Comanche Peak did have handheld satellite phones available; however, for those phones to function, the antenna needed to be deployed outside of the control room envelope. Although there is a door to the turbine building roof from the main control room, the door forms part of the control room envelope and routing through the door violates the control room envelope. While cell phones can normally be used via Wi-Fi, the internet loss precluded main control room use of cell phones on March 21, 2022. The inspectors assessed this situation to see if a viable compensatory method of communications among principal response organizations was provided for in the event of a radiological emergency. To ensure assumptions about the maximum radiological dose to control room emergency workers were provided for their protection, the ventilation envelope could not be breached to set up the antenna. Therefore, there was no viable compensatory measure in place. .

Comanche Peak updated the dedicated copper lines federal telephone system to VOIP emergency notification system using RIS 2000-11 in the spring 2021 due to reliability concerns of the copper circuitry. The inspectors noted that the licensee's modification to VOIP protocols failed to account for the introduction of single point vulnerabilities. Specifically, the connection to the sites internal network by the internet service provider included only one line. Internet outages created by damage or degradation of a single line occur on occasion; therefore, they are reasonably within the licensee's ability to foresee. In addition, numerous losses occurred in 2021 providing the licensee with sufficient information to recognize the vulnerability and take interim actions to ensure communications capability until redundancy in the internet connection could be implemented. The inspectors note that there was overall improvement in line clarity with the upgrade to emergency notification system, but the station remained vulnerable to communications degradation due to the known single point vulnerability.

The inspectors previously reviewed emergency preparedness communication issues in 2021. No more than minor performance deficiencies were identified during that review. This inspection was documented in the 71152 Inspection in the 2021004 (ADAMS Accession No. ML22019A304 https://www.nrc.gov/docs/ML2201/ML22019A304.pdf).

Corrective Actions: For completed corrective actions, Comanche Peak has updated the black start satellite telephone dialing protocol procedure and added a second internet line with a diverse method (microwave vs. local area network). Planned corrective action included adding a third internet line with a diverse switch which eliminates an existing single point

vulnerability in the currently installed internet lines. Additional actions are I documented in CR-2022-1892.

Corrective Action References: Comanche Peak entered the loss of internet events into the corrective action program under CR-2021-7895, tracking report (TR) 2022-1822, TR-2022-1892, TR-2022-1886, CR-2021-3239, TR-2021-7938, CR-2021-6637, TR-2021-5058, CR-2021-5014, TR 2021-1209, TR-2022-1688, TR-2021-5017, CR-2022-1894, TR-2022-1823, TR-2022-1848, CR-2021-2796, TR-2021-7588.

Performance Assessment:

Performance Deficiency: The failure to ensure reliable emergency communication methods were available from the control room was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Facilities and Equipment attribute of the Emergency Preparedness cornerstone and adversely affected the cornerstone objective to ensure that the licensee can implement adequate measures to protect the health and safety of the public in the event of a radiological emergency. Specifically, on March 21, 2022, the unplanned loss of internet impacted emergency communication methods to offsite response organizations, which effects public health and safety in the event of a radiological emergency.

Significance: The inspectors assessed the significance of the finding using Manual Chapter 0609, “Significance Determination Process,” attachment 4 (effective date December 13, 2019), and the corresponding Appendix B, “Emergency Preparedness Significance Determination Process, table 5.6-1. The performance deficiency was determined have very low safety significance (Green) because it was a failure to comply with NRC requirements, was a degraded planning standard function, and the deficiency lasted less than 24 hours from the time of discovery and there were no compensatory measures implemented.

Cross-Cutting Aspect: P.3 - Resolution: The organization takes effective corrective actions to address issues in a timely manner commensurate with their safety significance. Comanche Peak modified the site's telecommunication infrastructure with the intent to improve the reliability of control room communication by transitioning from degraded copper circuitry to VOIP technology. However, the site experienced multiple outages the year following the modification but failed to implement timely corrective actions prior to more significant communications equipment outages.

Enforcement:

Violation: Title 10 CFR 50.54(q)(2), requires, in part, that a power reactor licensee follow and maintain the effectiveness of an emergency plan which meets the requirements of appendix E to 10 CFR Part 50 and the standards of 10 CFR 50.47(b). Title 10 CFR 50.47(b)(6) requires, in part, that provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Contrary to the above, on March 21, 2022, the licensee failed follow and maintain the effectiveness of an emergency plan which meets the requirements of appendix E to 10 CFR Part 50 and the standards of 10 CFR 50.47(b). Specifically, the license failed to meet the planning standard in 10 CFR 50.47(b)(6) due to a loss of internet event and degraded backups resulting in no communication methods available from within the main control room to offsite response organizations.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

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

- On July 28, 2022, the inspectors presented the triennial heat exchanger and heat sink performance inspection results to Mr. T. McCool, Site Vice President, and other members of the licensee staff.
- On August 25, 2022, the inspectors presented the emergency plan exercise inspection results to Mr. T. McCool, Site Vice President, and other members of the licensee staff.
- On September 22, 2022, the inspectors presented the evaluations of changes, tests, and experiments inspection results to Mr. T. McCool, Site Vice President, and other members of the licensee staff.
- On October 6, 2022, the inspectors presented the integrated inspection results to Mr. A. Marzloff, Plant Manager, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Procedures	SOP-204B	Containment Spray System	6
71111.04	Procedures	SOP-809A	Diesel Generator Ventilation System	13
71111.04	Procedures	SOP-904	Fire Protection Main Water Supply and Fire Pumps System	17
71111.04	Procedures	SOP-908B	Diesel Generator System	18
71111.05	Fire Plans	FPI-104A	Unit 1 Train A Diesel Generator and Equipment Elevation 810 and Fuel Oil Day Tank Room Elevation 844	4
71111.05	Fire Plans	FPI-105A	Unit 1 Train B Diesel Generator and Equipment Elevation 810 and Fuel Oil Day Tank Room Elevation 844	4
71111.05	Fire Plans	FPI-401	Auxiliary Building Elevation 790'-6"	3
71111.05	Fire Plans	FPI-403	Auxiliary Building Elevation 810'-6"	5
71111.05	Miscellaneous	Drill No 22-12-03	Fire Drill Scenario: Train A Centrifugal Charging Pump	09/02/2022
71111.06	Calculations	2-NU-0059	Unit 2 Safeguards Building Flooding Analysis	3
71111.06	Corrective Action Documents	TR-YYYY-NNNN	TR-2022-000683	
71111.06	Corrective Action Documents	CR-YYYY-NNNN	2015-000079	
71111.07T	Calculations	1-EB-302-04	Auxiliary Feedwater Pump Rooms - Unit 1	6
71111.07T	Calculations	1-EB-302-05	RHR Pump Rooms Unit 1	5
71111.07T	Calculations	1-EB-303-01	Centrifugal Charging Pump Rooms -Unit 1	7
71111.07T	Calculations	1-EB-311-01	ESF Local Cooler Areas Summary Spare Heat Gains and Maximum Temperatures (LOCA with LOOP)	9
71111.07T	Calculations	1-EB-311-08	Safety Chilled Water Pump Evaluation	5
71111.07T	Calculations	1-EB-311-12	Evaluation of Safety Chiller Capacities at Reduced CCW Flow Rates - Unit 1	0
71111.07T	Calculations	1-EB-311-3	ESF Local Cooler Areas Summary - Space Heat Gains and Maximum Temperatures (LOCA w/OPA) - Unit 1	4
71111.07T	Calculations	16345-ME(B)-088	Station Service Water System Steady State Hydraulic Calculations	8
71111.07T	Calculations	16345-ME(B)-183	SSI Heat Loads	5
71111.07T	Calculations	X-SC-04-04	SSW Travelling Screen 02 Differential Pressure X-L-4289A	8

71111.07T	Corrective Action Documents	CR-YYYY-NNNN	2019-007485, 2020-004666, 2020-004864, 2020-006675, 2020-009296, 2021-002257, 2021-002716, 2021-005490, 2022-002640, 2022-003351, 2022-004955	
71111.07T	Corrective Action Documents	TR-YYYY-NNNN	2021-005163	
71111.07T	Corrective Action Documents Resulting from Inspection	Issue Report (IR)	2022-005606, 2022-005664	
71111.07T	Drawings	M1-0229	Flow Diagram Component Cooling Water System	CP-22
71111.07T	Drawings	M1-0311	Flow Diagram Ventilation Safety Chilled Water System	CP-30
71111.07T	Miscellaneous		Open Cooling Water Plant Specific Guidelines	4
71111.07T	Miscellaneous	CCP 1-02 Lube Oil Cooler	Unit 1 Service Water Visual Inspection Form	03/03/2021

71111.07T	Miscellaneous	CCP 1-02 Lube Oil Cooler	Unit 1 Service Water Visual Inspection Form	03/26/2019
71111.07T	Miscellaneous	CP-0001-024	Centrifugal Charging Pumps and Motors	73
71111.07T	Miscellaneous	CP-0081-001	Air Handling Units	3
71111.07T	Miscellaneous	CPNPP System Status	Safety Chilled Water	2nd Quarter, 2022
71111.07T	Miscellaneous	DBD-CS-096	Safe Shutdown Impoundment/Dam	14
71111.07T	Miscellaneous	DBD-ME-229	Comanche Peak Nuclear Power Plant Units 1 and 2, Design Basis Document, Component Cooling Water System	50
71111.07T	Miscellaneous	DBD-ME-233	Comanche Peak Nuclear Power Plant Units 1 and 2 Design Basis Document, Station Service Water System	39
71111.07T	Miscellaneous	DBD-ME-311	Comanche Peak Nuclear Power Plant Units 1 and 2, Design Basis Document, Safety Chilled Water System	21
71111.07T	Miscellaneous	NALCO Water Letter	Quarterly Closed Loop Analysis - 2022 Q1	06/15/2022
71111.07T	Procedures	ABN-501	Station Service Water Malfunction	10
71111.07T	Procedures	ABN-907	Acts of Nature	17
71111.07T	Procedures	COP-501	Chemistry Operating Procedures, Station Service Water	12
71111.07T	Procedures	COP-502A	Unit 1 Chemistry Operating Procedures Manual, Component Cooling Water	7
71111.07T	Procedures	COP-814	Unit 1 Chemistry Operating Procedure Manual, Ventilation	5

			Chilled Water	
71111.07T	Procedures	COP-815A	Unit 1 Chemistry Operating Procedures Manual, Safety Chilled Water	5
71111.07T	Procedures	MSE-G0-4003	Motor Insulation Resistance Testing	5
71111.07T	Procedures	OPT-201A	Charging System	15
71111.07T	Procedures	OPT-207A	Service Water System	20

71111.07T	Procedures	OPT-209A	Surveillance Test, Safety Chilled Water System	16
71111.07T	Procedures	OPT-209B	Surveillance Test, Safety Chilled Water System	12
71111.07T	Procedures	PPT-SX-7517	Safe Shutdown Impoundment Inspection	2
71111.07T	Procedures	STA-734	Service Water System Fouling Monitoring Program	5
71111.07T	Procedures	TDM-901A	Systems Data, Throttled Valves/Flow Rates	14
71111.07T	Procedures	TSP-509	Predictive Maintenance Thermographic Analysis Program	6
71111.07T	Work Orders	Work Orders (WO)	3667839, 3868301, 3953450, 3975749, 4260995, 4434930, 4765986, 4813602, 4941796, 5135252, 5282413, 5326811, 5370719, 5436260, 5532319, 5535113, 5671623, 5685144, 5695618, 5779054, 5794744, 5813178, 5814385, 5823278, 5924058, 5926668, 5927760, 5928617, 5951210, 5955001, 5958222, 5968810, 5972626, 5974285, 5980342, 6006826, 6020235, 6024697, 21-776632, 21-940915, 21-941868, 22-103231, 22-14288, 22-183905, 22-70886, 22-79326	
71111.12	Corrective Action Documents	CR-YYYY-NNNN	2019-7903, 2022-1492	
71111.12	Miscellaneous		System Health Report AC Distribution 6.9KV Switchgear	4th quarter 2021
71111.12	Miscellaneous	Maintenance Rule Database for Unit 2 Main Turbine	Program Reports	
71111.12	Miscellaneous	System Health Report for Unit 2 Main Turbine		
71111.13	Corrective Action Documents	TR-YYYY-NNNN	2022-004908	

71111.13	Miscellaneous	SORC 22-010	Unit 1 Forced Outage Start up Meeting Package	09/11/2022
71111.17T	Calculations	ME-CA-0229-	CCW Parameters for Fouling Monitoring	1

		5129		
71111.17T	Corrective Action Documents	CR-YYYY-NNNN	2019-001271, 2019-001317, 2019-001428, 2019-001430, 2019-001711, 2019-004542, 2019-003684, 2019-006767, 2022-005805	
71111.17T	Corrective Action Documents	TR-YYYY-NNNN	2019-001133, 2019-009096, 2020-005137, 2020-007888, 2021-002308, 2021-003710, 2022-000031, 2022-004593	
71111.17T	Corrective Action Documents Resulting from Inspection	Issue Report (IR-)	2022-006839, 2022-006874, 2022-006886, 2022-006890, 2022-006915, 2022-006916	
71111.17T	Drawings	554	Starting Air Receivers Delaval Part No. 76001-125	7
71111.17T	Drawings	M1-0215	Flow Diagram Starting Air Piping CP1-MEDGEE-01	CP-27
71111.17T	Engineering Changes	FDA-2017-000092-01	Replace the Unit 1 and Unit 2 Emergency Diesel Generator Starting Air Compressors	12
71111.17T	Miscellaneous	DBD-ME-006	Control of Heavy Loads at Nuclear Plants	40
71111.17T	Miscellaneous	DBD-ME-011	Diesel Generator Sets	41
71111.17T	Miscellaneous	DBD-ME-303-01	Fuel Building Ventilation System	11
71111.17T	Procedures		CPNPP 50.59 Resource Manual	6
71111.17T	Procedures	ABN-712	Rod Control System Malfunction	14
71111.17T	Procedures	INC-3027	Control Rod Drop Timing	0
71111.17T	Procedures	IPO-010B	Reactor Coolant System Reduced Inventory Operations	18
71111.17T	Procedures	MDA-304	Control of Heavy Loads and Critical Lifts	7
71111.17T	Procedures	MSG-2013	Polar Crane/Telescoping Jib Crane Operating Instructions and Restrictions	4
71111.17T	Procedures	NUC-114	Core Performance Engineering Periodic Duties	20
71111.17T	Procedures	NUC-206	Control Rod Drop Timing	22
71111.17T	Procedures	SOP-608A	120, 208, 208/120, and 120/240 VAC Distribution System	14
71111.17T	Procedures	SOP-608B	120, 208, 208/210, and 120/240 VAC Distribution System	5
71111.17T	Procedures	STA-707	10CFR50.59 and 10CFR72.48 Reviews	23
71111.17T	Procedures	STI-707.01	10CFR50.59 Screens	0
71111.17T	Procedures	STI-707.04	10CFR50.59 and 10CFR72.48 Reviews Applicability Determinations	1
71111.18	Corrective Action Documents	TR-YYYY-NNNN	2018-3643, 2022-1952, 2022-1407	

71111.18	Procedures	SAG-1.0	Control Room Severe Accident Initial Response	0
71111.18	Procedures	SAG-9.0	Technical Severe Accident Response Mitigate Fission Product Release	0
71111.18	Procedures	STI-203.02	Preparation of Sever Accident Management Guidance	0
71111.18	Procedures	STI-203.02	Preparation of Severe Accident Management Guidance	0
71111.19	Corrective Action Documents	TR-YYYY-NNNN	2022-4908	
71111.22	Procedures	IPO-002A	Plant Startup from Hot Standby	23

71114.01	Corrective Action Documents	CR-YYYY-NNNN TR-YYYY-NNNN	CR-2017-009505, CR-2019-008751, CR-2019-008766, CR-2019-008787, CR-2019-008798, CR-2019-008800, CR-2020-001364, CR-2020-001368, CR-2020-002313, CR-2020-004960, CR-2020-006058, CR-2020-006768, CR-2020-007289, CR-2021-008503, CR-2021-008514, CR-2022-000174, CR-2022-001649, CR-2022-004837, CR-2022-005181, CR-2022-005234, CR-2022-006005, CR-2022-006006, CR-2022-006007, CR-2022-006008, CR-2022-006052, CR-2022-006061, CR-2022-006063, CR-2022-006064, TR-2017-009355, TR-2017-009418, TR-2017-009419, TR-2017-009430, TR-2017-009436, TR-2017-009487, TR-2017-009491, TR-2017-009492, TR-2017-009506, TR-2017-009508, TR-2017-009509, TR-2017-009511, TR-2019-008671, TR-2019-008770, TR-2019-008799, TR-2021-008177, TR-2022-005307, TR-2022-0060062	
71114.01	Corrective Action Documents Resulting from Inspection	Issue Reports	IR-2022-006242	
71114.01	Miscellaneous		Management Challenge Presentation: 07/27/2022 Green Team Exercise Summary	08/15/2022
71114.01	Miscellaneous		Control Room Simulator Exercise Participant Logs	07/27/2022
71114.01	Miscellaneous		Exercise Report, Red Team November 06, 2019	07/12/2022
71114.01	Miscellaneous		Exercise Report, Gold Team, August 16,2017	10/15/2017
71114.01	Miscellaneous		Green Team, Exercise Report, June 24, 2020	07/12/2022
71114.01	Miscellaneous		Technical Support Center Exercise Participant Logs	07/27/2022

71114.01	Miscellaneous		Technical Support Center Focused Drill Participant Logs	07/26/2022

71114.01	Miscellaneous		Operations Support Center Exercise Participant Logs	07/27/2022
71114.01	Miscellaneous		Operations Support Center Focused Drill Participant Logs	07/26/2022
71114.01	Miscellaneous		Emergency Operations Facility Exercise Participant Logs	07/27/2022
71114.01	Miscellaneous		Joint Information Center Exercise Participant Logs	07/27/2022
71114.01	Miscellaneous		CPNPP Emergency Plan	45
71114.01	Miscellaneous		Management Challenge Presentation: 7/26/2022 Green Team Exercise Summary (Focused Area Drill TSC and OSC Only)	08/15/2022
71114.01	Procedures	ABN-907	Acts of Nature	17
71114.01	Procedures	ABN-909	Spent Fuel Pool/Refueling Cavity Malfunction	9
71114.01	Procedures	BSI-3.0	Spent Fuel Cooling Safety Function Restoration	0
71114.01	Procedures	EPP-116	Emergency Repair & Damage Control and Immediate Entries	9
71114.01	Procedures	EPP-201	Assessment of Emergency Action Levels Emergency Classification and Plan Activation	13
71114.01	Procedures	EPP-201 Technical Bases	Emergency Action Level Technical Bases Document	1
71114.01	Procedures	EPP-203	Notifications	16
71114.01	Procedures	EPP-205	Activation and Operation of the Operations Support Center (OSC)	12
71114.01	Procedures	EPP-206	Activation and Operation of the Emergency Operations Facility (EOF)	18
71114.01	Procedures	EPP-303	Operation of Computer Based, Emergency Dose Assessment System	13
71114.01	Procedures	EPP-304	Protective Action Recommendations	22

71114.01	Procedures	EPP-309	Onsite/In-Plant Radiological Surveys and Offsite Radiological Monitoring	15
71114.01	Procedures	FRH-0.1A	Response to Loss of Secondary Heat Sink	9
71114.01	Procedures	SAG-1.0	Control Room Severe Accident Initial Response	0
71114.01	Procedures	SAG-10.0	TSC Severe Accident response Control SFP Level	0
71114.01	Procedures	SOP-506	Spent Fuel Pool Cooling and Cleanup System	22
71114.04	Miscellaneous		CPNPP 10 CFR 50.54(q)(3) Screening Evaluation Form for ANS Design Report Change	03/11/2021

71114.04	Miscellaneous		CPNPP 10 CFR 50.54(q)(3) Screening and Effectiveness Evaluation Forms for OSSA Change	06/23/2021
71114.04	Procedures		CPNPP 10 CFR 50.54(q)(3) Screening and Effectiveness Evaluation Form for Emergency Plan Revision 45	05/24/2021
71114.04	Procedures		CPNPP Emergency Plan	45
71114.04	Procedures		CPNPP Emergency Plan	44
71114.04	Procedures	EPP-123	10 CFR 50.54(q) Screening and Evaluation of Changes to Emergency Plan Documentation	3
71151	Miscellaneous		NucIQ data on reactor coolant system for Units 1 and 2 for June, 2022	
71151	Miscellaneous		Control room log leak rate readings July 1, 2021, through June 30, 2022.	
71151	Miscellaneous		MSPI Margin Reports PRA Living Model Report	
71151	Miscellaneous		ANS Test Report Data 2021Q2-2022Q2	
71151	Miscellaneous		Quarterly Key ERO Member Drill Participation Trackers 2021Q2-2022Q2	
71151	Miscellaneous		DEP PI Data 2021Q2-2022Q2	

71151	Procedures	SG-012	Alert and Notification System Surveillance	31
71151	Procedures	SG-020	NRC Performance Indicators	23
71151	Procedures	STA-662	Administrative Control of the Siren System	1
71152A	Procedures	STI-433.02	Emergency Response Facility Functionality Evaluation	2