



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

January 18, 2024

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

**SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT – NOTIFICATION OF
COMMERCIAL GRADE DEDICATION INSPECTION (05000445/2024012 AND
05000446/2024012) AND REQUEST FOR INFORMATION**

Dear Ken Peters:

The purpose of this letter is to notify you that U.S. Nuclear Regulatory Commission (NRC) staff will conduct the commercial grade dedication baseline inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2, beginning on April 29, 2024. The inspection team will be composed of three personnel from the NRC Region IV office. The inspection will be conducted in accordance with NRC inspection procedure (IP) 71111.21N.03, "Commercial Grade Dedication," dated February 16, 2023.

The inspection will evaluate the implementation of Comanche Peak Nuclear Power Plant's process for dedicating commercial grade items, as required in applicable portions of Appendix B to Title 10 of the *Code of Federal Regulations* Part 50, to ensure reasonable assurance is provided that these items will perform their intended safety function. Additionally, this inspection will evaluate implementation of Comanche Peak Nuclear Power Plant's procurement process for safety-related structures, systems, and components, as required in Appendix B.

The inspection will include an onsite information gathering visit by the team lead and two weeks of onsite inspection by the team. The schedule for the inspection is as follows:

- Onsite Information Gathering Visit: February 26-29, 2024
- Offsite Preparation Week: April 22-25, 2024
- Onsite Inspection Weeks: April 29 – May 2, 2024 and May 13-16, 2024

The purpose of the information gathering visit is to meet with your staff to become familiar with the process for dedicating commercial grade items and the process for procuring safety-related structures, systems, and components at Comanche Peak Nuclear Power Plant. A high-level presentation of site-specific commercial grade dedication and safety-related procurement activities would be beneficial. This visit may include a tour of onsite commercial grade item dedication facilities, receipt inspection facilities, storage facilities, and installed plant components associated with potential inspection samples. During the visit, the team lead will also review the information provided in the initial information request to select a list of potential

inspection samples. The team lead may also identify other information needed to support the inspection during this visit.

To minimize the impact on your staff and to ensure an effective and efficient inspection, we have enclosed two separate requests for information needed prior to the onsite information gathering visit and offsite inspection preparation week. The first request (Enclosure 1) is generally for information that will be used to choose the inspection samples or information that will be applicable to all inspection samples throughout the inspection. This information should be made available to the team lead prior to the information gathering visit. The second request (Enclosure 2) is for information that is specific to an individual sample and should be made available prior to the offsite preparation week.

Additional information requests, interviews with your staff, and/or walkdowns of facilities or installed plant components will be made by the team throughout the inspection to complete their review of the selected inspection samples. It is important that all documentation provided to the team is complete and up-to-date to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. Additionally, to facilitate an efficient inspection, we request that a contact individual be assigned to each inspector to ensure information requests, questions, and concerns are addressed in a timely manner.

We understand that Mr. Ryan Sexton from your Regulatory Affairs organization is our contact for this inspection. If there are any questions about the inspection or the information requested, please contact the team lead, Mr. Wes Cullum, by telephone at 817-200-1563 or by email at wes.cullum@nrc.gov. Enclosure 3 contains additional contact information for the inspection team.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, under Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

In accordance with 10 CFR 2.390 of the NRC rules and practices, a copy of this letter and its enclosures will be available electronically for public inspection in the NRC public document room or from the publicly available records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC website.

Sincerely,



Signed by Gaddy, Vincent
on 01/18/24

Vincent G. Gaddy, Chief
Engineering Branch 1
Division of Operating Reactor Safety

Docket No.05000445, 05000446
License No. NPF-87, NPF-89

Enclosures:

1. Documents Requested Prior to
Information Gathering Visit
2. Documents Requested Prior to
Inspection Preparation Week
3. Inspection Team Contact Information

cc w/ encl: Distribution via LISTSERV

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF COMMERCIAL GRADE DEDICATION INSPECTION (05000445/2024012 AND 05000446/2024012) AND REQUEST FOR INFORMATION DATED JANUARY 18, 2024.

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DOCUMENT NAME: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF COMMERCIAL GRADE DEDICATION INSPECTION (05000445/2024012 AND 05000446/2024012) AND REQUEST FOR INFORMATION

Non-Public Designation Category: MD 3.4 Non-Public _____ (A.3 - A.7 or B.1)

ADAMS ACCESSION NUMBER: **ML24018A107**

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OFFICE	BC:DORS/EB1	SRI:DORS/EB1			
NAME	VGaddy	WCullum			
SIGNATURE	/RA/	/RA/			
DATE	01/18/24	01/18/24			

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Enclosure 1

Documents Requested Prior to Information Gathering Visit

The documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hardcopy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all the listed documents. In addition, your plant-specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below.

Documents requested by February 19, 2024:

1. Copy of procedures for dedicating commercial grade items/services, procuring safety-related structures, systems, and components (SSCs), performing receipt inspections, controlling counterfeit, fraudulent, and suspect items, and 10 CFR Part 21 evaluations and reporting.
2. Sortable list of commercial grade items/services that completed the dedication process within the past six years. These items/services may have been dedicated by Comanche Peak Nuclear Power Plant or by a vendor (or other licensee) and procured by Comanche Peak Nuclear Power Plant. Include, as applicable, relevant information such as the item/service's material/catalog identification number and description, parent/host equipment identification number and description, purchase order number, installation work order/job number, and date of issue/installation.
3. Sortable list of SSCs that were procured as safety-related within the past six years. Include, as applicable, relevant information such as the SSC's material/catalog identification number and description, parent/host equipment identification number and description, purchase order number, installation work order/job number, date of issue/installation, and end-use safety classification.
4. Sortable list of dedicated commercial grade items/services or procured safety-related SSCs that were placed on hold within the past six years because of concerns identified during receipt, dedication, or from operating experience or the corrective action program as applicable.
5. Sortable list of dedicated commercial grade items/services or procured safety-related SSCs, with a brief description, where dedication/procurement activities were expedited within the past six years.
6. Sortable list of dedicated commercial grade-items/services or procured safety-related SSCs that failed after completing dedication/procurement activities or required corrective maintenance within the past six years.

7. Sortable list of corrective action program documents, with a brief description, related to commercial grade item/service dedication, safety-related SSC procurement, receipt inspection, and storage activities within the past six years.
8. Copy of any self-assessments or audits of commercial grade item/service dedication and/or safety-related SSC procurement activities performed within the past six years.
9. Copy of the updated final safety analysis report, operational quality assurance program description, technical specifications, and technical requirements manual, including applicable bases documents.
10. Sortable list of systems, including identifying designators and corresponding names.
11. List of individuals who will be supporting the inspection and their contact information.

Enclosure 2

Documents Requested Prior to Inspection Preparation Week

For the samples identified by the team lead, the documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the inspection. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hardcopy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all the listed documents. In addition, your plant-specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

Documents requested by April 15, 2024:

1. Complete commercial grade item dedication package including relevant documentation such as the following, as applicable: description of item/service, identification of safety functions and safety classifications of item/parent component, like-for-like or equivalency evaluations, credible failure modes/failure modes and effects analysis, critical characteristics and acceptance criteria, identification of the supplier's commercial quality assurance program or other documented controls.
2. Complete purchase order including relevant documentation such as the following, as applicable: purchase requisition, catalog specifications, item product data sheets/vendor manuals, shelf-life information, service/qualified life information, certificates of conformance/compliance/quality, vendor test and inspection reports, third-party or sub vendor test and inspection results, vendor dedication or partial dedication information, material receiving reports, packing list/invoices or other shipping documents, and other pertinent vendor/licensee correspondence.
3. Receipt inspection reports and any related test reports, documents noting any deviations from design, material, and performance characteristics relevant to the safety function (nonconformance dispositions).
4. Documents showing objective evidence of special test and inspection procedures used to verify technical and quality requirements have been met, commercial grade survey reports, or source verification reports; any other documents to trace the item from the time it was dedicated to the time it was installed, tested, and accepted.
5. Completed installation work orders and stock or material issue forms; completed post-installation test procedures and results.

6. Design basis information of the inspection sample or parent/host component such as: normal/accident service environment, normal/accident performance requirements, design basis document/system description, relevant UFSAR/technical specification sections, calculation/drawing/procedure updates, etc.
7. 10 CFR 50.59 documentation, if required.
8. Sortable list of corrective action program documents, with a brief description, associated with the inspection sample or parent/host equipment.

Enclosure 3

Inspection Team Contact Information

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