



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

September 3, 2024

Ken Peters, Executive 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 –
NOTIFICATION OF COMPREHENSIVE ENGINEERING TEAM INSPECTION
(05000445/2025012 AND 05000446/2025012) AND REQUEST FOR
INFORMATION**

Dear Ken Peters:

The purpose of this letter is to notify you that, the U.S. Nuclear Regulatory Commission (NRC) staff will conduct the comprehensive engineering team inspection at Comanche Peak Nuclear Power Plant, Units 1 and 2, beginning on January 27, 2025. The inspection team will be composed of seven personnel from the NRC Region IV office. The inspection will be conducted in accordance with NRC inspection procedure (IP) 71111.21M, "Comprehensive Engineering Team Inspection," dated October 7, 2022.

The objectives of the inspection are to verify that risk-significant structures, systems, and components (SSCs) have been maintained and will operate within their design and licensing bases requirements; modifications to risk-significant SSCs did not introduce conditions that adversely impact the ability of SSCs to perform their design and licensing bases functions; the design basis, licensing basis, and performance capability of SSCs have not been adversely impacted by changes introduced through degraded conditions and other activities; and that requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.59 have been appropriately implemented.

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: December 9-12, 2024
- Offsite Preparation Week: January 20-24, 2025
- Onsite Inspection Weeks: January 27-30, 2025, and February 10-13, 2025

The purpose of the information gathering visit is to meet with your staff to become familiar with Comanche Peak Nuclear Power Plant's SSCs, programs, processes, and procedures and to ensure the resources needed to support the team, as necessary, to conduct an effective and

efficient inspection. This visit may include a tour of installed plant SSCs 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 tours 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 Ryan Sexton from your Regulatory Compliance organization is our contact for this inspection. If there are any questions about the inspection or the information requested, please contact the team lead, Dustin Reinert, by telephone at 817-200-1534 or by e-mail at Dustin.Reinert@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 Web site.

Sincerely,



Signed by Gaddy, Vincent
on 09/03/24

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

Docket Nos. 05000445 and 05000446
License Nos. NPF-87 and 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 COMPREHENSIVE ENGINEERING TEAM INSPECTION (05000445/2025012 AND 05000446/2025012) AND REQUEST FOR INFORMATION – DATED SEPTEMBER 3, 2024

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DOCUMENT NAME: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – NOTIFICATION OF COMPREHENSIVE ENGINEERING TEAM INSPECTION (05000445/2025012 AND 05000446/2025012) AND REQUEST FOR INFORMATION

ADAMS ACCESSION NUMBER: **ML24243A015**

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OFFICE	BC:DORS/EB1	SRI:DORS/EB1			
NAME	VGaddy	DReinert			
DATE	09/03/24	09/03/24			

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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 on-site and off-site 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 (hard copy) 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 of 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 November 27, 2024:

1. Copy of Comanche Peak Nuclear Power Plant's probabilistic risk assessment (PRA) summary document for the current internal events, external events (e.g., fire, flooding, seismic), and shutdown PRA models of record.
2. From the internal events PRA, a sortable list of structures, systems, and components (SSCs) with risk achievement worth (RAW) and Birnbaum values for both core damage frequency (CDF) and large early release frequency (LERF). Include all basic events with RAW values of 1.3 or greater and Birnbaum values of 1E-6 or greater.
3. From the external events PRA, a sortable list of SSCs with RAW and Birnbaum values for both CDF and LERF. Include all basic events with RAW values of 1.3 or greater and Birnbaum values of 1E-6 or greater.
4. From the internal events PRA, a sortable list of human failure events (HFEs) with RAW and Birnbaum values for both CDF and LERF.
5. From the external events PRA, a sortable list of HFEs with RAW and Birnbaum values for both CDF and LERF.
6. Sortable list of SSCs and HFEs sorted by engineering or expert panel judgement such as those performed to identify risk-significant SSCs for Comanche Peak Nuclear Power Plant's Maintenance Rule program.
7. Sortable list of SSCs with known low analytical, operating, maintenance, or complexity margin, if available.
8. Sortable list of temporary or permanent modifications that were implemented since the last triennial NRC design bases inspection, including a brief description, modification type, and whether the modification is safety-related. Implemented means accepted or placed into service and declared functional/operable, as applicable. Modifications may include, but are not limited to, equivalency evaluations, commercial grade dedications, and changes to SSCs, procedures, set points, calculations, designs, and/or the licensing bases.

9. Sortable list of 10 CFR 50.59 applicability determinations of implemented changes, tests, and experiments that did not result in a screening since the last triennial NRC 10 CFR 50.59 inspection.
10. Sortable list of 10 CFR 50.59 screenings of implemented changes, tests, and experiments that did not result in an evaluation since the last triennial NRC 10 CFR 50.59 inspection.
11. Sortable list of 10 CFR 50.59 evaluations of implemented changes, tests, and experiments that did not result in an application for a license amendment since the last triennial NRC 10 CFR 50.59 inspection.
12. Sortable list of implemented changes, tests, and experiments where an alternate process or screening criteria was applied since the last triennial NRC 10 CFR 50.59 inspection (e.g. Standard Design Process screening criteria).
13. Copy of the last two submittals of the report containing a brief description of any changes, tests, and experiments, including a summary of the evaluation of each, required by 10 CFR 50.59(d)(2).
14. Sortable list of operating experience evaluations performed since the last triennial NRC design bases inspection, including whether the operating experience was applicable. Operating experience sources may include, but are not limited to, NRC generic communications, licensee event reports, plant operating experience, 10 CFR Part 21 reports, previous NRC inspection findings, and vendor communications.
15. Sortable list of corrective action program documents associated with issues identified during the last NRC design bases inspection.
16. Copy of implementing/program procedures, as applicable, for performing modifications, time critical/sensitive operator actions, 10 CFR 50.59 activities, operating experience evaluations, and the corrective action program.
17. Copy of any self-assessments or audits in preparation for this inspection or related to activities associated with this inspection (i.e., design, modifications, 10 CFR 50.59, operating experience) performed within the past four years.
18. Copy of the updated final safety analysis report, technical specifications, technical requirements manual, surveillance frequency control program, quality assurance program, and inservice testing program, including applicable bases documents.
19. If any risk-informed alternative treatment programs (e.g. 10 CFR 50.69, ASME Code Case N-752, etc.) have been approved for implementation, copies of any implementing procedures for those programs and a sortable list of SSCs, their risk informed safety class (RISC), and what alternate treatment or exemptions have been implemented.

20. Sortable list of normal, abnormal, or emergency procedures.
21. Sortable list of systems, including identifying designators and corresponding names.
22. List of personnel who will be assisting with the inspection, including contact information.

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 on-site and off-site 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 (hard copy) 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 of 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. The files for each sample may be provided as compressed (zipped) files.

Documents requested for each sample type by January 16, 2025:

1. Structure, System, and Component (SSC) Samples
 - a. Copy of relevant design bases document, system description, etc.
 - b. Copy of relevant vendor manuals (i.e., installation, operation, maintenance).
 - c. Copy of relevant design calculations, diagrams, and drawings.
 - d. Copy of relevant normal, abnormal, or emergency procedures.
 - e. List of relevant preventive maintenance activities, including a brief description, and frequency. Include procedures/instructions and most recently completed work order/job for each activity.
 - f. List of relevant inspections and tests, including a brief description, and frequency. Include procedures/instructions and most recently completed work order/job for each inspection/test.
 - g. Copy of the relevant PRA system notebook.
 - h. Copy of the relevant system health notebook.
 - i. Sortable list of relevant corrective action program documents, including a brief description, within the past four years. Alternatively, if the number of documents is few, provide complete copies of these documents with any attachments.

2. Modification Samples

- a. Copy of the complete change package.
- b. Copy of the completed implementing work order.
- c. Copy of any post-modification tests, etc.
- d. Copy of any relevant corrective action program documents.
- e. Copy of relevant vendor manuals (i.e., installation, operation, maintenance).
- f. Copy of affected procedures, training materials, preventive maintenance or inspection/testing activities, calculations, design specifications, drawings, updated final safety analysis report, technical specifications, etc.

3. 10 CFR 50.59 Samples

- a. Copy of the relevant 10 CFR 50.59 applicability determination, screening, or evaluation.
- b. Copy of training/qualification record/status of personnel who performed the 10 CFR 50.59 activity.
- c. Copy of any relevant corrective action program documents.
- d. Copy of any affected procedures, training materials, preventive maintenance or inspection/testing activities, calculations, design specifications, drawings, updated final safety analysis report, technical specifications, etc.

4. Operating Experience Samples

- a. Copy of the complete operating experience evaluation.
- b. Copy of any relevant corrective action program documents.
- c. Copy of any affected procedures, training materials, preventive maintenance or inspection/testing activities, calculations, design specifications, drawings, updated final safety analysis report, technical specifications, etc.

Inspection Team Contact Information

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