COMANCHE PEAK NUCLEAR POWER PLANT

Comanche Peak Nuclear Power Plant
Christopher J. Jackson
Nuclear Site Vice President
Vistra Operations Company LLC
P.O. Box 1002
6322 North FM 56
Glen Rose, TX 76043
Office: 254.897.6411

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TXX-26022
April 20, 2026

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Ref 10 CFR 50.73

Subject: Comanche Peak Nuclear Power Plant (CPNPP)
Docket No. 50-446
Condition Prohibited by Technical Specifications for Containment Ventilation and Isolation due to Human Performance Error
Licensee Event Report 2-26-001-00

Dear Sir or Madam:

Attached is a Licensee Event Report (LER) 2-26-001-00, "Condition Prohibited by Technical Specifications for Containment Ventilation and Isolation due to Human Performance Error" for Comanche Peak Nuclear Power Plant (CPNPP) Unit 2.

This communication contains no new commitments regarding CPNPP Units 1 or 2.

Should you have any questions, please contact Kassie Mandrell at (254) 897 – 6987 or Kassie.Mandrell@vistracorp.com.

Sincerely,

Christopher J. Jackson

Attachment: NRC Form 366 – LER 2-26-001-00 (3 pages)

cc:
John Monninger, Region IV [John.Monninger@nrc.gov]
William Orders, NRR [William.Orders@nrc.gov]
John Ellegood, Senior Resident Inspector, CPNPP [John.Ellegood@nrc.gov]
Jack Freeman, Resident Inspector, CPNPP [Jack.Freeman@nrc.gov]

NRC FORM 366 (04-02-2024) | U.S. NUCLEAR REGULATORY COMMISSION | APPROVED BY OMB: NO. 3150-0104 | EXPIRES: 04/30/2027

LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/)

1. Facility Name		2. Docket Number	3. Page
Comanche Peak Nuclear Power Plant, Unit 2	■ 050 ☐ 052	00446	1 OF 3

4. Title

Condition Prohibited by Technical Specifications for Containment Ventilation and Isolation due to Human Performance Error

5. Event Date			6. LER Number			7. Report Date			8. Other Facilities Involved		
Month	Day	Year	Year	Sequential Number	Revision No.	Month	Day	Year	Facility Name	☐ 050	Docket Number
02	17	2026	26	- 001 -	00	04	20	2026	Facility Name	☐ 052	Docket Number

9. Operating Mode	10. Power Level
1	100

11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: *(Check all that apply)*

10 CFR Part 20	☐ 20.2203(a)(2)(vi)	**10 CFR Part 50**	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)	☐ 73.1200(a)
☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)	☐ 73.1200(b)
☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)	☐ 73.1200(c)
☐ 20.2203(a)(1)	☐ 20.2203(a)(4)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)	☐ 73.1200(d)
☐ 20.2203(a)(2)(i)	**10 CFR Part 21**	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(A)	**10 CFR Part 73**	☐ 73.1200(e)
☐ 20.2203(a)(2)(ii)	☐ 21.2(c)	☐ 50.69(g)	☐ 50.73(a)(2)(v)(B)	☐ 73.77(a)(1)	☐ 73.1200(f)
☐ 20.2203(a)(2)(iii)		☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(C)	☐ 73.77(a)(2)(i)	☐ 73.1200(g)
☐ 20.2203(a)(2)(iv)		☑ 50.73(a)(2)(i)(B)	☐ 50.73(a)(2)(v)(D)	☐ 73.77(a)(2)(ii)	☐ 73.1200(h)
☐ 20.2203(a)(2)(v)		☐ 50.73(a)(2)(i)(C)	☐ 50.73(a)(2)(vii)		

☐ **OTHER** (Specify here, in abstract, or NRC 366A).

12. Licensee Contact for this LER

Licensee Contact	Phone Number (Include area code)
Kassie Mandrell	254-897-6987

13. Complete One Line for each Component Failure Described in this Report

Cause	System	Component	Manufacturer	Reportable to IRIS		Cause	System	Component	Manufacturer	Reportable to IRIS
A	IL	MON	S637	Y						

14. Supplemental Report Expected		15. Expected Submission Date	Month	Day	Year
☑ No	☐ Yes (If yes, complete 15. Expected Submission Date)				

16. Abstract (Limit to 1326 spaces, i.e., approximately 13 single-spaced typewritten lines)

On February 17, 2026 at approximately 1115, Operations removed a clearance supporting an active Technical Specification Limiting Condition for Operability (LCO) for maintenance on the Unit 2 Containment Air Particulate/Iodine/Gas (PIG) monitor without verification of the TS exit criteria. When the clearance was removed, the containment PIG was not verified operable and the exit criteria for the associated TS LCO 3.6.3, Containment Isolation Valves, was not met. Containment penetration valves were closed but available to open in violation of TS LCO 3.6.3 Condition B to "Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange." Upon discovery, the clearance was re-established to protect the associated containment isolation on February 19, 2026 at 1634. The cause of the event was a human performance error associated with procedure use and adherence for closure and verification of LCO clearances per ODA-308, "LCO Tracking Program" and STI-605.01, "Work Control and Clearance and Safety Tagging." Corrective actions include leadership reinforcement for TS and clearance procedure requirements, incorporation of clearance requirements into Licensed Operator re-qualification simulator and classroom training, Senior Reactor Operator mentoring and increased oversight of TS clearance activities.

LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

(See NUREG-1022, R.3 for instruction and guidance for completing this form http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/)

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 04/30/2027

1. FACILITY NAME		2. DOCKET NUMBER	3. LER NUMBER		
			YEAR	SEQUENTIAL NUMBER	REV NO.
Comanche Peak Nuclear Power Plant, Unit 2	■ 050 ☐ 052	00446	26	- 001	- 00

NARRATIVE

DESCRIPTION OF REPORTABLE EVENT

At 1115 on February 17, 2026, Comanche Peak Nuclear Power Plant (CPNPP) Unit 2 was in MODE 1 operating at 100% power.

On February 17, 2026 at 0827, CPNPP Unit 2 entered TS LCO 3.3.6 Condition A (one radiation monitoring channel inoperable) to perform maintenance on the Containment air Particulate/Iodine/Gas (PIG) monitor [EIIS:(IL)(MON)]. The maintenance activity was supported by two separate clearances. One clearance was placed for the maintenance on the PIG and the other clearance established TS LCO conditions to meet TS 3.3.6 and TS 3.6.3 Condition B (isolation of containment penetration valves) with the PIG inoperable in MODES 1-4 greater than 4 hours. On February 17, 2026 at approximately 1115, the initial maintenance on the PIG was completed and the maintenance clearance was released by the work group. Although the initial work was complete, the PIG was not restarted and additional testing was required later in the week before the PIG could be functional and declared operable. This subsequent testing was to be performed using a separate work order that did not require a maintenance clearance and was not linked to the LCO clearance or the same LCO entry. As a result, the SRO removed the TS clearance and closed the LCO tracker on February 17, 2026 at 1115, when the initial work was complete without verifying PIG operability and the exit criteria for TS LCO 3.6.3 Condition B. A verification of operability, prior to TS clearance removal, is required by STI-605.01, "Work Control and Clearance and Safety Tagging." Additionally the SRO failed to meet ODA-308, "LCO Tracking Program," which requires independent verification by the Unit Supervisor prior to LCO closure. On February 19, 2026 at approximately 1400, the Shift Manager (SM) identified the closed TS LCO clearance during a board walkdown in the control room. The on-shift crew took immediate actions to correct the condition. The TS clearance and LCO tracker were restored on February 19, 2026 at 1634.

This event is reportable under 10CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's TS" for a condition prohibited by TS LCO 3.6.3 "Containment Isolation Valves," which was not met from February 17, 2026 at 1115 to February 19, 2026 at 1634 when the clearance was re-established. TS LCO 3.6.3 Condition B required actions were not performed to isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange within 1 hour and Condition E requires a shutdown to MODE 3 in 6 hours, if Condition B is not met. TS LCO 3.6.3 Condition B was initially entered when TS LCO 3.3.6 Condition A, for Unit 2 containment radiation monitoring panel, was entered for maintenance lasting longer than 4 hours and resulted in entry into TS LCO 3.3.6 B.1. The approximate duration of non-compliance with TS LCO requirements is 53 hours and 19 minutes.

Containment ventilation isolation instrumentation closes the containment isolation valves in the Containment Purge, Hydrogen Purge, and Containment Pressure Relief Systems. This action isolates the containment atmosphere from the environment to minimize releases of radioactivity in the event of an accident. One containment radiation monitor (PIG) is provided as input to the containment ventilation isolation.

There were no other systems inoperable or degraded that contributed to this event. This event did not involve systems or secondary functions that were affected by the unplanned Technical Specification (TS) non-compliance.

CAUSE OF EVENT

The direct cause of this event was a failure to follow station procedures for the validation of PIG operability prior to removal of the LCO clearance and lack of independent verification after TS LCO closure. This was a result of inadequate preparation and understanding of the work scope impacting operability and an inaccurate assumption regarding plant configuration. Additionally, the SRO and Unit Supervisor did not use precise, closed-loop, three-way communication to confirm TS exit criteria and clearance status prior to removal as required.

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Comanche Peak Nuclear Power Plant, Unit 2	■ 050 ☐ 052	00446	26	- 001	- 00

NARRATIVE

ANALYSIS OF EVENT

There were no actual nuclear, radiological, environmental or personnel safety consequences associated with this event. No containment ventilation, purge or pressure relief was performed during this period of time. The containment penetration valves are normally closed valves without an automatic open feature which may only be opened manually when initiating containment ventilation. This event has been evaluated as not meeting the definition of a safety system functional failure per 10 CFR 50.73(a)(2)(v).

TS LCO Action Entries
3.3.6 A. One radiation monitoring channel inoperable
A.1 Restore the affected channel to OPERABLE status. - 4 hours
3.3.6 B. Required Action and associated Completion Time of Condition A not met.
B.1 Enter applicable Conditions and Required Actions of LCO 3.6.3, "Containment Isolation Valves, " for containment ventilation isolation valves made inoperable by isolation instrumentation. - Immediately.
3.6.3 B. One or more penetration flow paths with two containment isolation valves inoperable except for containment purge, hydrogen purge or containment pressure relief valve leakage not within limit.
B.1 Isolate the affected penetration flow path by use of at least one closed an deactivated automatic valve, closed manual valve, or blind flange. - 1 hour
3.6.3 E. Required Action and associated Completion Time not met
E.1 Be in MODE 3 AND Be in MODE 5 - 6 hours AND 36 hours

CORRECTIVE ACTIONS

Corrective Actions include the following completed and planned items:
-Immediate actions were taken to re-establish the TS LCO clearance
-Immediate reinforcement of expectations to all Senior Reactor Operators(SRO), Unit Shift Managers and Unit Shift Supervisors
-Implement an interim learning session for all Operations Leadership focused on TS 3.6.3 requirements, clearance independence, and TS exit criteria verification expectations.
-Develop and implement simulator and classroom training scenarios reinforcing TS ownership, operability assessment rigor, administrative defenses, TS LCO action initiation/termination, and independent verification requirements. Scenarios will challenge assumption based decision making and require verification of full work scope, Unit Supervisor engagement, effective three-way communication and TS exit-criteria confirmation.
-Improve oversight by integrating TS verification behaviors in routine leadership touchpoints, including shift turnovers and work control SRO reviews.
-Assign an experienced SRO as mentor to monitor and coach SRO operability evaluations.

PREVIOUS SIMILAR EVENTS

On September 11, 2025, the Unit 1 Emergency Diesel Generator was declared operable and the TS LCO was removed when post work testing was still required to be performed. The post work testing was not identified in the work schedule and the operator assumed all work was included in the schedule steps. Although this event is similar, the evaluation failed to identify and address the knowledge deficiency with ODA-308, "LCO Tracking." Corrective actions included coaching and information sharing. These actions did not prevent the event described above. This event was reviewed as part of the investigation and additional actions are being taken to reinforce expectations for adherence to ODA-308 in Operations training. No other similar events were identified during the three year review.