

From: [Michael Mahoney](#)
To: [ext. Nic Boehmisch](#)
Cc: [Hipo Gonzalez](#); [Hicks, Jack](#); [William Orders](#)
Subject: Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 - Request For Additional Information - License Amendment Request - Revision to Emergency Plan (L-2026-LLA-0077)
Date: Tuesday, September 29, 2026 9:10:01 AM
Attachments: image001.png
RAI - Comanche Peak Request 26-003 Emergency Plan Revision (L-2026-LLA-0077).docx

Mr. Boehmisch,

By application dated April 9, 2026 (Agencywide Documents Access and Management System Accession No. ML26099A193), Vistra Operations Company LLC (Vistra OpCo), submitted a license amendment request (LAR) requesting changes to the emergency plans for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 (CPNPP) to the U.S. Nuclear Regulatory Commission (NRC) for review and prior approval pursuant to Section 50.54(q) of Title 10 of the Code of Federal Regulations (10 CFR). Specifically, the proposed changes would re-align augmented Emergency Response Organization (ERO) positions, redefine minimum staffing positions in the Emergency Response Facilities (ERFs) to align with the new facility activation criteria and remove administrative positions in the ERFs. The proposed changes also align the CPNPP ERO with the organization used at other Vistra sites.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has identified areas where additional information is needed to complete its review.

A response to the attached RAI is requested no later than 30 business days from the date of this correspondence.

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me.

Once this email is added to ADAMS, I will provide the accession number.

Thanks

Mike Mahoney

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REQUEST FOR ADDITIONAL INFORMATION RELATED TO
LICENSE AMENDMENT REQUEST TO REVISE THE EMERGENCY RESPONSE
ORGANIZATION POSITIONS
VISTRA OPERATIONS COMPANY LLC
COMANCHE PEAK UNIT NOS. 1 AND 2,
DOCKET NOS.: 50-445 AND 50-446
L-2026-LLA-0077

Background

By application dated April 9, 2026 (Agencywide Documents Access and Management System Accession No. ML26099A193), Vistra Operations Company LLC (Vistra OpCo), submitted a license amendment request (LAR) requesting changes to the emergency plans for Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 (CPNPP) to the U.S. Nuclear Regulatory Commission (NRC) for review and prior approval pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR). Specifically, the proposed changes would re-align augmented Emergency Response Organization (ERO) positions, redefine minimum staffing positions in the Emergency Response Facilities (ERFs) to align with the new facility activation criteria and remove administrative positions in the ERFs. The proposed changes also align the CPNPP ERO with the organization used at other Vistra sites.

NRC Staff Request for Additional Information (RAI)

RAI 1:

Regulatory Requirement:

10 CFR 50.47(b)(2) requires On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

Issue: Table 1.1, Minimum On-Shift and Augmented Staffing Requirements 60-minute facility activation has the In-plant/Onsite (out-of-plant) and the Protective Actions Major tasks assigned to individuals titled RP qualified individuals. Attachment 3, ERO Change Summary states that the OSC RP Technicians have not changed. The labeling of RP qualified individuals does not match the naming convention RP Technicians throughout the document, and it is uncertain whether CPNPP intends to use individuals who are not fully qualified ANSI 3.1 RP Technicians.

Request: Provide information on whether RP Technicians are ANSI 3.1 qualified and whether they are intended to be utilized under the Radiological Accident Assessment Major Functional area or if this is a labeling error. If CPNPP intends to use RP qualified individuals, provide additional evidence of analysis that demonstrates how the RP qualified individuals are fully qualified ANSI 3.1 technicians and provide an updated emergency plan to describe the new position, intended roles and responsibilities and the training they will be receiving for emergency response.