



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION IV  
1600 E LAMAR BLVD  
ARLINGTON, TX 76011-4511

September 1, 2015

Rafael Flores, Senior Vice President  
and Chief Nuclear Officer  
Attention: Regulatory Affairs  
Luminant Generation Company LLC  
Comanche Peak Nuclear Power Plant  
P.O. Box 1002  
Glen Rose, TX 76043

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR COMANCHE PEAK NUCLEAR  
POWER PLANT, UNITS 1 AND 2 (REPORT 05000445/2015005 AND  
05000446/2015005)

Dear Mr. Flores:

On August 12, 2015, the Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of Comanche Peak Nuclear Power Plant, Units 1 and 2. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2014, through June 30, 2015. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined the performance at Comanche Peak Nuclear Power Plant, Units 1 and 2, during the most recent quarter was within the Regulatory Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because of one or more greater-than-green Security Cornerstone inputs as described in our follow-up assessment letter on May 8, 2015. The specifics of the one or more greater-than-green Security Cornerstone inputs were further described in Inspection Report 05000445/2015406; 05000446/2015406, sent to you on April 28, 2015.

On July 28, 2015, your staff notified the NRC of your readiness for it to conduct a supplemental inspection to review the actions taken to address the performance issues. Therefore, in addition to ROP baseline inspections, the NRC plans to conduct a supplemental inspection in accordance with the supplemental inspection procedure appropriate for the numbers and types of greater-than-green Security Cornerstone inputs. The date of the supplemental inspection has been determined and will be included with the inspection plan for security-related inspections, which will be sent via separate, non-publicly available correspondence.

Per the guidance in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," safety significant cornerstone inputs are considered in the Action Matrix assessment for four quarters after the final determination is made as to the significance of the finding/performance indicator.

As noted in our May 8, 2015, letter to you, the one or more greater-than-green inputs to the Security Cornerstone resulted in our movement of Comanche Peak Nuclear Power Plant, Units 1 and 2, to the Regulatory Response Column effective beginning the 3<sup>rd</sup> quarter 2014. In that your staff did not confirm its readiness for the NRC to complete the requisite supplemental inspection for these issues until recently, consistent with guidance in IMC 0305, Section 11.01.d. these inputs will be considered held-open in the current quarter until such time that the supplemental inspection is completed.

The enclosed inspection plan lists the inspections scheduled through June 30, 2017. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. The audit has been completed at Comanche Peak Nuclear Power Plant, and the information gathered will aid staff in development of the ultimate Safety Evaluation for the site. After the NRC staff receives the Final Compliance letter for the site, the Final Safety Evaluation will be issued. Then, the NRC staff will confirm through inspections the full implementation of the orders mentioned above by performing Temporary Instruction 2515/191, "Inspection of the Implementation of Mitigating Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans."

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter 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 at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact Ryan Alexander at (817) 200-1195 with any questions you have regarding this letter.

Sincerely,

**/RA/**

Troy Pruett, Director  
Division of Reactor Projects

Docket Nos.: 50-445; 50-446  
License Nos.: NPF-87; NPF-89

Enclosure: Comanche Peak Nuclear  
Power Plant, Units 1 and 2  
Inspection/Activity Plan

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OFFICIAL RECORD COPY

Letter to Rafael Flores from Troy Pruett dated September 1, 2015

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR COMANCHE PEAK NUCLEAR  
POWER PLANT, UNITS 1 AND 2 (REPORT 05000445/2015005 AND  
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Distribution via Listserv for Comanche Peak Nuclear Power Plant

## Comanche Peak

## Inspection / Activity Plan

07/01/2015 - 06/30/2017

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
<b>EB1-21T - CP COMPONENT DESIGN BASIS INSPECTION</b>				
1, 2	06/01/2015 07/02/2015	IP 7111121	Component Design Bases Inspection	6
<b>TSB 52B - BIENNIAL PI&amp;R INSPECTION</b>				
1, 2	08/31/2015 09/04/2015	IP 711152B	Problem Identification and Resolution	4
1, 2	09/14/2015 09/18/2015	IP 711152B	Problem Identification and Resolution	
<b>RS 13 PI - RADIATION SAFETY</b>				
1, 2	10/12/2015 10/16/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	2
1, 2	10/12/2015 10/16/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	10/12/2015 10/16/2015	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1, 2	10/12/2015 10/16/2015	IP 71151-PR01	RETS/ODCM Radiological Effluent Occurrences	
<b>71111.08 - INSERVICE INSPECTION 2R15</b>				
2	10/12/2015 10/23/2015	IP 7111108P	Inservice Inspection Activities - PWR	1
<b>EXAMS - INITIAL OPERATOR EXAM</b>				
1	06/13/2016 06/17/2016	X02572	INITIAL EXAM COMANCHE PEAK UNIT 1 (06/2016)	5
2	06/13/2016 06/17/2016	X02573	INITIAL EXAM COMANCHE PEAK UNIT 2 (06/2016)	
1	07/11/2016 07/15/2016	X02572	INITIAL EXAM COMANCHE PEAK UNIT 1 (06/2016)	
2	07/11/2016 07/15/2016	X02573	INITIAL EXAM COMANCHE PEAK UNIT 2 (06/2016)	
<b>RS 5678 - RADIATION SAFETY - TEAM</b>				
1, 2	02/08/2016 02/12/2016	IP 71124.05	Radiation Monitoring Instrumentation	4
1, 2	02/08/2016 02/12/2016	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1, 2	02/08/2016 02/12/2016	IP 71124.07	Radiological Environmental Monitoring Program	
1, 2	02/08/2016 02/12/2016	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
<b>EP-1 - BIENNIAL EP PROGRAM INSPECTION</b>				
1, 2	02/22/2016 02/26/2016	IP 7111402	Alert and Notification System Testing	1
1, 2	02/22/2016 02/26/2016	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1, 2	02/22/2016 02/26/2016	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1, 2	02/22/2016 02/26/2016	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
<b>EP-2 - EP PERFORMANCE INDICATORS</b>				
1, 2	02/22/2016 02/26/2016	IP 71151-EP01	Drill/Exercise Performance	1
1, 2	02/22/2016 02/26/2016	IP 71151-EP02	ERO Readiness	
1, 2	02/22/2016 02/26/2016	IP 71151-EP03	Alert & Notification System Reliability	
<b>RS 12 PI - RADIATION SAFETY</b>				
1, 2	05/09/2016 05/13/2016	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	2
1, 2	05/09/2016 05/13/2016	IP 71124.02	Occupational ALARA Planning and Controls	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

## Comanche Peak

## Inspection / Activity Plan

07/01/2015 - 06/30/2017

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			<b>RS 12 PI - RADIATION SAFETY</b>		<b>2</b>
1, 2	05/09/2016	05/13/2016	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1, 2	05/09/2016	05/13/2016	IP 71151-PR01	RETS/ODCM Radiological Effluent Occurrences	
			<b>71111.08 - INSERVICE INSPECTION 1RF18</b>		<b>1</b>
1	05/09/2016	05/20/2016	IP 7111108P	Inservice Inspection Activities - PWR	
			<b>EB1-17T - CP PERM PLANT MODS &amp; 50.59 INSPECTION</b>		<b>3</b>
1, 2	09/12/2016	09/30/2016	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
			<b>BRQ-2017 - BRQ - ON SITE OP TEST INSPECTION</b>		<b>3</b>
1, 2	11/28/2016	12/02/2016	IP 7111111B	Licensed Operator Qualification Program	
			<b>EXAM - INITIAL EXAM</b>		<b>4</b>
1	05/15/2017	05/19/2017	X02589	INITIAL EXAM CP U1 (06/2017)	
2	05/15/2017	05/19/2017	X02590	INITIAL EXAM CP U2 (06/2017)	
1	06/12/2017	06/16/2017	X02589	INITIAL EXAM CP U1 (06/2017)	
2	06/12/2017	06/16/2017	X02590	INITIAL EXAM CP U2 (06/2017)	
			<b>EB1-07T - CP HEAT SINK PERFORMANCE</b>		<b>3</b>
1, 2	02/06/2017	02/10/2017	IP 7111107T	Heat Sink Performance	
			<b>RS 13 PI - RADIATION SAFETY</b>		<b>3</b>
1, 2	04/10/2017	04/14/2017	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1, 2	04/10/2017	04/14/2017	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	04/10/2017	04/14/2017	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1, 2	04/10/2017	04/14/2017	IP 71151-PR01	RETS/ODCM Radiological Effluent Occurrences	
			<b>71111.08 - INSERVICE INSPECTION 2RF16</b>		<b>1</b>
2	04/10/2017	04/21/2017	IP 7111108P	Inservice Inspection Activities - PWR	
			<b>EB2-05T - TRIENNIAL FIRE PROTECTION INSPECTION</b>		<b>4</b>
1, 2	06/12/2017	06/16/2017	IP 7111105T	Fire Protection [Triennial]	
1, 2	06/26/2017	06/30/2017	IP 7111105T	Fire Protection [Triennial]	
			<b>EP-1 - IN-OFFICE EP SCENARIO REVIEW</b>		<b>2</b>
1, 2	06/12/2017	07/21/2017	IP 7111408	Exercise Evaluation – Scenario Review	