



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

March 3, 2020

Mr. Ken Peters
Senior Vice President and Chief Nuclear Officer
Attention: Regulatory Affairs
Vistra Operations Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: ANNUAL ASSESSMENT LETTER FOR COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 (REPORT 05000445/2019006 AND 05000446/2019006)

Dear Mr. Peters:

The U.S. Nuclear Regulatory Commission (NRC) has completed its end-of-cycle performance assessment of Comanche Peak Nuclear Power Plant, Units 1 and 2, reviewing performance indicators, inspection results, and enforcement actions from January 1, 2019 through December 31, 2019. 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 concluded that overall performance at your facility preserved public health and safety.

The NRC determined the performance at Comanche Peak Nuclear Power Plant, Units 1 and 2, during the most recent quarter was within the Licensee Response Column, the highest performance category of the NRC's Reactor Oversight Process (ROP) Action Matrix, because all inspection findings had very low safety significance (i.e., Green) and all performance indicators were within the expected range (i.e., Green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

For the 12-month period ending August 8, 2019, the NRC issued three severity level IV traditional enforcement violations associated with impeding the regulatory process. However, despite having met the entry criteria, the NRC has decided not to conduct Inspection Procedure 92723, "Follow-up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period" to follow up on these violations because two of the violations occurred in the distant past and are not indicative of current performance. The NRC will continue to assess the remaining violation and any future traditional enforcement violations against the entry criteria for this supplemental inspection procedure.

Additionally, during this period the NRC will schedule an additional inspection per a revised version of Temporary Instruction (TI) 2515/194, "Inspection of the Licensee's Implementation of Industry Initiative Associated with the Open Phase Condition Design Vulnerability in Electrical Power Systems (NRC Bulletin 2012-01)" for any sites who elect to implement the guidance of the Industry Initiative on Open Phase Condition, Revision 3 (Agency Documents Access and

Management System (ADAMS) Accession ML19163A176), which included an option for relying on annunciation and operator manual actions instead of automatic protective features to isolate a power supply affected by an open phase condition. Licensees will be individually notified when the NRC schedules these inspections.

The enclosed inspection plan lists the inspections scheduled through December 31, 2021. This updated inspection plan now includes security inspections which were formerly transmitted under separate correspondence. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. Routine inspections performed by resident inspectors are not included in the inspection plan. You should be aware that the agency is pursuing potential changes to the ROP, including changes to engineering inspections (SECY-18-0113, "Recommendations for Modifying the Reactor Oversight Process Engineering Inspections"), and other changes to the baseline inspection program described in SECY-19-0067, "Recommendations for Enhancing the Reactor Oversight Process." Should these changes to the ROP be implemented, the engineering and other region-based inspections are subject to change in scope, as well as schedule. The inspections listed during the last 12 months of the inspection plan are tentative and may be revised. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In accordance with Title 10 of the *Code of Federal Regulations* (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 me at (817) 200-1141 with any questions you have regarding this letter.

Sincerely,

/RA/

Neil F. O'Keefe, Chief
Project Branch B
Division of Reactor Projects

Docket Nos. 05000445 and 05000446
License Nos. NPF-87 and NPF-89

Enclosure:
Inspection Plan

cc w/ encl: Distribution via LISTSERV

IP 22 Inspection Activity Plan Report

Comanche Peak

01/01/2020 - 12/31/2021

Unit	Start	End	Activity	CAC	Title	Staff Count
RS567 Radiation Safety PS Team						3
1, 2	01/27/2020	01/31/2020	IP 71124.05	000729	Radiation Monitoring Instrumentation	
1, 2	01/27/2020	01/31/2020	IP 71124.06	000730	Radioactive Gaseous and Liquid Effluent Treatment	
1, 2	01/27/2020	01/31/2020	IP 71124.07	000731	Radiological Environmental Monitoring Program	
Cyber Security Inspection - CP						4
1, 2	02/10/2020	02/14/2020	IP 71130.10P	000741	Cyber Security	
1, 2	02/24/2020	02/28/2020	IP 71130.10P	000741	Cyber Security	
Inservice Inspection 2RF18 - CP						1
2	04/27/2020	05/08/2020	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RS13PI Radiation Safety						2
1, 2	04/27/2020	05/01/2020	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	04/27/2020	05/01/2020	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
Fire Protection Inspection - CP						3
1, 2	06/08/2020	06/20/2020	IP 71111.21N.05	001646	Fire Protection Team Inspection (FPTI)	
1, 2	06/22/2020	07/04/2020	IP 71111.21N.05	001646	Fire Protection Team Inspection (FPTI)	
Comanche Peak 1, 2 - Powered Operated Valve Inspection						3
1, 2	08/10/2020	08/14/2020	IP 71111.21N.02	001645	Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements	
1, 2	08/24/2020	08/28/2020	IP 71111.21N.02	001645	Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements	
Security Access Control .02						1
1, 2	08/24/2020	08/28/2020	IP 71130.02	000734	Access Control	
1, 2	08/24/2020	08/28/2020	IP 71151	001338	Performance Indicator Verification	
CPSES 2020 BRQ						2
1, 2	09/27/2020	10/03/2020	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	
EP Program Inspection						1
1, 2	10/05/2020	10/09/2020	IP 71114.02	000717	Alert and Notification System Testing	
1, 2	10/05/2020	10/09/2020	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1, 2	10/05/2020	10/09/2020	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2	10/05/2020	10/09/2020	IP 71114.05	000720	Maintenance of Emergency Preparedness	

This report does not include INPO and OUTAGE activities.

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

IP 22 Inspection Activity Plan Report

Comanche Peak

01/01/2020 - 12/31/2021

Unit	Start	End	Activity	CAC	Title	Staff Count
EP Program Inspection						1
1, 2	10/05/2020	10/09/2020	IP 71151	001397	Performance Indicator Verification	
Inservice Inspection 1RF21 - CP						1
1	10/12/2020	10/23/2020	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RS8						1
1, 2	11/02/2020	11/06/2020	IP 71124.08	000732	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
Design Bases Assurance (Team) 21M - Comanche Peak						6
1, 2	02/08/2021	02/26/2021	IP 71111.21M	000713	Design Bases Assurance Inspection (Teams)	
Security FFD .08						1
1, 2	02/22/2021	02/26/2021	IP 71130.08	000740	Fitness For Duty Program	
EP Exercise and PI Inspection						4
1, 2	03/29/2021	04/02/2021	IP 71114.01	000716	Exercise Evaluation	
1, 2	03/29/2021	04/02/2021	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2	03/29/2021	04/02/2021	IP 71151	001397	Performance Indicator Verification	
Security Protective Strategy .05 w/Exercise						2
1, 2	05/03/2021	05/07/2021	IP 71130.05	000737	Protective Strategy Evaluation	
CPSES 2021 INITIAL EXAM						4
1, 2	05/09/2021	05/15/2021	OV	000956	VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1, 2	06/13/2021	06/19/2021	EXAD	000500	LICENSE EXAM ADMINISTRATION (EXAD)	
RP 2,4						2
1, 2	05/17/2021	05/21/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
1, 2	05/17/2021	05/21/2021	IP 71124.04	000728	Occupational Dose Assessment	
MCA - Material Control & Accounting						1
1, 2	05/17/2021	05/21/2021	IP 71130.11	000742	Material Control and Accounting (MC&A)	
Security Access Authorization .01 and Access Control .02 w/PIV						2
1, 2	07/26/2021	07/30/2021	IP 71130.01	000733	Access Authorization	

This report does not include INPO and OUTAGE activities.

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

IP 22 Inspection Activity Plan Report

Comanche Peak

01/01/2020 - 12/31/2021

Unit	Start	End	Activity	CAC	Title	Staff Count
Security Access Authorization .01 and Access Control .02 w/PIV						2
1, 2	07/26/2021	07/30/2021	IP 71130.02	000734	Access Control	
1, 2	07/26/2021	07/30/2021	IP 71151	001338	Performance Indicator Verification	
Biennial PI&R Inspection						4
1, 2	09/13/2021	09/17/2021	IP 71152B	000747	Problem Identification and Resolution	
1, 2	09/27/2021	10/01/2021	IP 71152B	000747	Problem Identification and Resolution	
Inservice Inspection 2RF19 - CP						1
2	10/11/2021	10/22/2021	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RP 1,2,PI						2
1, 2	10/18/2021	10/22/2021	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2	10/18/2021	10/22/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	