



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

March 17, 2021

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: COMANCHE PEAK NUCLEAR POWER PLANT - INDEPENDENT SPENT FUEL
STORAGE INSTALLATION, PHYSICAL SECURITY REQUIREMENTS FOR
INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS INSPECTION
REPORT 07200074/2021401

Dear Mr. Peters:

On February 25, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Comanche Peak Nuclear Power Plant independent spent fuel storage facility. The NRC inspector discussed the results of this inspection with Mr. T. McCool, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No violations of significance were noted and no response to this letter is required.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Public Inspections, Exemptions, Requests for Withholding," a copy of this letter, its enclosure and your response, if you choose to provide one, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Document Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room). To the extent possible, your response, if you choose to provide one, should not include

any security related, personal privacy, or proprietary information so that it can be made available to the public without redaction.

Sincerely,

Ray L. Kellar, P.E., Chief
Plant Support Branch 1
Division of Reactor Safety

Docket No. 07200074

Enclosure:
As stated

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COMANCHE PEAK NUCLEAR POWER PLANT - INDEPENDENT SPENT FUEL STORAGE
INSTALLATION, PHYSICAL SECURITY REQUIREMENTS FOR INDEPENDENT SPENT
FUEL STORAGE INSTALLATIONS INSPECTION REPORT 07200074/2021401 –DATED
March 17, 2021

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 07200074

License Number: NPF-87 and NPF-89

Report Number: 07200074/2021401

Enterprise Identifier: I-2021-401-0019

Licensee: Vistra Operations Company LLC

Facility: Comanche Peak Nuclear Power Plant

Location: Glen Rose, TX

Inspection Dates: February 23 to February 25, 2021

Inspectors: D. Holman, Senior Physical Security Inspector

Approved By: Ray L. Kellar, P.E., Chief
Plant Support Branch 1
Division of Reactor Safety

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a Baseline Security Inspection at the Fort Calhoun Station, in accordance with Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations."

List of Violations

No violations of more than minor significance were identified.

INSPECTION SCOPES

Inspections were conducted using Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations," and review of general license requirements contained in 72.212(b), the approved physical security plan (PSP), and applicable ISFSI security orders. The inspector reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

81311 - Physical Security Requirements for Independent Spent Fuel Storage Installations

1. Inspection Scope

- The inspector verified the licensee protects the spent fuel against the design basis threat of radiological sabotage in accordance with the provisions and requirements as are set forth in the licensee's physical security plan pursuant to 10 CFR 73.55 and the conditions and exemptions under the provisions of 10 CFR 72.212(b)(9) and any site specific security orders.
- The inspector verified the licensee's ISFSI physical protection measures do not decrease the effectiveness of the physical protection program for the protection of vital equipment associated with the reactor and spent fuel pool required by 10 CFR 73.55. (10 CFR 72.212(b)(9)(i).
- The inspector verified the storage of spent fuel is within a protected area, in accordance with 10 CFR 73.55(e). (10 CFR 72.212(b)(9)(ii).
- The inspector verified at a minimum, personnel searches are performed by physical pat-down searches or by firearms and explosives detection equipment prior to admission to the protected area. (10 CFR 73.55(h)(3)) and (10 CFR 72.212(b)(9)(iii).
- The inspector verified that the protected area assessment capability provides for the assessment of detected activity at the protected area perimeter and the initiation of timely response. (10 CFR 72.212(b)(9)(iv) and 10 CFR 73.55(i)(3)).
- The inspector verified the licensee protects safeguards information against unauthorized disclosure. (10 CFR 73.21 and 10 CFR 73.22).

INSPECTION RESULTS

No violations were identified.

EXIT MEETINGS AND DEBRIEFS

The inspector verified no proprietary information was retained or documented in this report.

- On February 18, 2021, the inspector presented the security baseline inspection results to Mr. T. McCool, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
81311	Corrective Action Documents Resulting from Inspection	IR	2021-001420, 2021-001421, 2021-001422	
		TR	2021-001455, 2021-001466, 2021-001467, 2021-001470, 2021-001471	
	Miscellaneous	Entry Access List	ISFSI Access List	2/09/2021
		Validation List	Monthly Vital Area Validation	11/11/2020
		Validation List	Monthly Vital Area Validation	12/08/2020
		Validation List	Monthly Vital Area Validation	01/07/2021
		Form 8011-1	Escort Guidelines, Linked to SEC-302-3 R16	08/17
		Form STA-902-1	Access Level Form, Linked to STA-902	Revision 13
		NRC Order EA-04-187	ISFSI Order For Implementation of Additional Security Measures Associated With Access Authorization	2004
		Plan	CPNPP Physical Security Plan, ISFSI Annex	Revision 12
		SEC 506	Security Equipment and Firearms Testing and Observation	Revision 36
		SI 3.2	Access Control	Revision 65
	Procedures	SI 5.0	ISFSI Access Control	Revision 7
		SI 5.2	ISFSI Security	Revision 6
		STA-902	Access To CNPP Site Areas	Revision 26