



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

December 9, 2021

Mr. Ken Peters
Senior Vice President and Chief Nuclear Officer
VISTRA Operating Company, LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWERPLANT, UNITS 1 AND 2 – SECURITY
BASELINE INSPECTION REPORT 05000445/2021403 AND 05000446/2021403

Dear Mr. Peters:

On October 12, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Comanche Peak Nuclear Powerplant, Units 1 and 2. On November 3, 2021, the NRC inspectors discussed the results of this inspection with Mr. John Dreyfuss, Director, Organizational Effectiveness, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in cursive script that reads "Ray Kellar".

Signed by Kellar, Ray
on 12/09/21

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

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

Enclosure:
Inspection Report 05000445/2021403
and 05000446/2021403

COMANCHE PEAK NUCLEAR POWERPLANT, UNITS 1 AND 2 – SECURITY BASELINE
INSPECTION REPORT 05000445/2021403 AND 05000446/2021403 DATED – DECEMBER 9,
2021

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000445 and 05000446

License Numbers: NPF-87 and NPF-89

Report Numbers: 05000445/2021403 and 05000446/2021403

Enterprise Identifier: I-2021-403-0000

Licensee: VISTRA Operating Company, LLC

Facility: Comanche Peak Nuclear Powerplant, Units 1 and 2

Location: Glen Rose, TX 76043

Inspection Dates: August 16, 2021 to October 12, 2021

Inspectors: C. Jewett, Physical Security Inspector
A. Meyen, Physical Security Inspector

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

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Comanche Peak Nuclear Powerplant, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspectors 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. Publicly available IPs are located at:

<http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

The inspectors 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. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

SAFEGUARDS

71130.05 - Protective Strategy Evaluation

The inspectors evaluated the licensee's protective strategy through completion of the following procedure elements:

Protective Strategy Evaluation (2 Samples)

- (1)
 - Tier I: All Requirements
 - Tier II: All Requirements
 - Tier III: All Requirements
- (2)
 - Performance Evaluation Program: Inspectors observed a licensee conducted annual FOF on August 18, 2021.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On November 3, 2021, the inspectors presented the security baseline inspection results to Mr. John Dreyfuss, Director, Organizational Effectiveness, and other members of the licensee staff.

DOCUMENTS REVIEWED

| Inspection Procedure | Type | Designation | Description or Title | Revision or Date |
|----------------------|---|---|--|------------------|
| 71130.05 | Corrective Action Documents | CR-2019-007675, CR-2019-008686, CR-2019-009475, CR-2020-000156, CR-2020-005465, CR-2021-003925 | | |
| | Corrective Action Documents Resulting from Inspection | IR-2021-005404, CR-2021-003925 | | |
| | Miscellaneous | | CPNPP Security Plan | 013 |
| | | | Compensatory and Contingency Instruction | 030 |
| | | EVAL-2020-006 | CPNPP Nuclear Oversight Audit Report: Physical Security | 01/20/2021 |
| | | SC21.ADV.BS1 | Adversary Training | 000 |
| | | SC37.SDG.ZZ1 | Force-On-Force Controller Training | 000 |
| | Procedures | CPNPP Security Instruction | Alarm Stations | 059 |
| | | CPNPP Security Instructions 1.0 | CPNPP Common Instructions | 042 |
| | | SEC-102-1 | Plan Change Review Form | 09/22/2021 |
| | | SEC-116 | Drills and Exercises | 012 |
| | | SEC-119 | Protective Strategy | 017 |
| | | SEC-506 | SECURITY EQUIPMENT MAINTENANCE, TESTING, AND CALIBRATION | 037 |
| | Self-Assessments | TR-2021-002589 | 71130.05 Protective Strategy | |