

April 13, 2000

Mr. Oliver D. Kingsley  
President, Nuclear Generation Group  
Commonwealth Edison Company  
ATTN: Regulatory Services  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: NRC RADIATION PROTECTION INSPECTION REPORT  
50-237/2000004(DRS); 50-249/2000004(DRS)

Dear Mr. Kingsley:

On March 17, 2000, the NRC completed a routine inspection at the Dresden Generating Station, Units 2 and 3. The purpose of the inspection was to review the radiological effluent and radiological environmental monitoring programs. The enclosed report presents the results of that inspection. No violations of NRC requirements were identified.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of work in progress, and interviews with personnel.

We concluded that your radiological effluent and radiological environmental monitoring programs met the regulatory requirements. However, the lack of an Offsite Dose Calculation Manual/Radiological Environmental Monitoring Program (ODCM/REMP) Coordinator and poor management oversight resulted in administrative deficiencies in both programs.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Electronic Reading Room (PERR) link at the NRC homepage, <http://www.nrc.gov/NRC/ADAMS/index.html>.

O. Kingsley

-2-

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

***/RA by J. House Acting For/***

Wayne Slawinski, Acting Chief  
Plant Support Branch  
Division of Reactor Safety

Docket Nos. 50-237; 50-249  
License Nos. DPR-19; DPR-25

Enclosure: Inspection Report 50-237/20004(DRS);  
50-249/20004(DRS)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services  
C. Crane, Senior Vice President, Nuclear Operations  
H. Stanley, Vice President, Nuclear Operations  
R. Krich, Vice President, Regulatory Services  
DCD - Licensing  
P. Swafford, Site Vice President  
Robert Fisher, Station Manager  
D. Ambler, Regulatory Assurance Manager  
M. Aguilar, Assistant Attorney General  
State Liaison Officer  
Chairman, Illinois Commerce Commission

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-237; 50-249  
License Nos: DPR-19; DPR-25

Report No: 50-237/2000004(DRS); 50-249/2000004(DRS)

Licensee: Commonwealth Edison Company (ComEd)

Facility: Dresden Nuclear Generating Station, Units 2 and 3

Location: 6500 N. Dresden Road  
Morris, IL 60540

Dates: March 13 - 17, 2000

Inspectors: M. Mitchell, Radiation Specialist  
D. Nelson, Radiation Specialist

Approved by: Wayne Slawinski, Acting Chief, Plant Support Branch  
Division of Reactor Safety

## EXECUTIVE SUMMARY

Dresden Nuclear Generating Station, Units 2 and 3  
NRC Inspection Report 50-237/2000004(DRS); 50-249/2000004(DRS)

This announced inspection included a review of the licensee's radiation protection (RP) program. Specifically, the following areas were reviewed:

- Radiological Effluent Monitoring Program
- Radiological Environmental Monitoring Program (REMP)

This inspection covered a 5-day period concluding on March 17, 2000.

The following conclusions were reached in these areas:

- The REMP program was well implemented, and monitoring results indicated that there was no discernable environmental impact from plant operations (Section R1.1).
- A self-assessment of the radiological effluent monitoring program and radiological environmental monitoring program (REMP) determined that both programs had suffered administratively due to the lack of management oversight (Section R1.1).
- Effluent monitors were operational, calibrated, and had set points established in compliance with the Offsite Dose Calculation Manual (ODCM) (Section R2.1).
- Problem Identification Forms (PIF) related to the REMP and effluent monitoring programs documented issues that were minor in nature. The corrective actions taken were appropriate (Section R7.2).
- Several PIFs pointed to weaknesses in the Apparent Cause Evaluation process and the 10 CFR 50.59 safety review program (Section R7.2).
- Surveillances of the meteorological data collection equipment met the requirements of the ODCM. System availability was excellent (Section R7.3).

## Report Details

### IV. Plant Support

#### **R1 Radiological Protection and Chemistry Controls**

##### **R1.1 Implementation of the Radiological Environmental Monitoring Program (REMP)**

###### **a. Inspection Scope (84750)**

The inspectors reviewed the 1998 Annual Radiological Environmental Operating Report, the 1998 Annual Radioactive Effluent Release Report, and the ODCM. The inspectors also reviewed the radiation protection department's focus-area self-assessment of the radiological effluent monitoring and REMP programs. The inspectors observed the collection of air particulate/iodine air samples in the field, and interviewed various plant staff regarding the operability and material condition of the sampling equipment and the implementation of the REMP.

###### **b. Observations and Findings**

The inspectors reviewed the radiation protection department's 1<sup>st</sup> quarter, 2000, focus-area self-assessment of the offsite dose calculation manual (radiological effluent monitoring program) and REMP. The self-assessment covered both programs in great detail. The assessment team's conclusions regarding the effectiveness of the programs were not limited to specific findings, but included an assessment of management effectiveness in overseeing the programs. The team concluded that, although the radiological effluent program and REMP had met the procedural and regulatory requirements, management oversight of the programs had been inadequate. The team noted that the ODCM/REMP Coordinator position had been vacant from April 1999 until February 2000. This resulted in untimely reviews and completions of program documentation, inadequate control of documents, and out of date controlled copies of the ODCM. In February 2000, a new ODCM/REMP Coordinator was installed. The new Coordinator indicated that one of his first duties as Coordinator was to lead the self-assessment team. Following the self-assessment, the team generated a Problem Identification Form (PIF) to address program deficiencies. The Coordinator used the self-assessment to become familiar with the programs and had developed an action plan to correct the programs' deficiencies. At the exit meeting, management indicated that naming a new Coordinator had been hindered by uncertainty regarding which department, radiation protection or chemistry, would assume responsibility for the ODCM/REMP. Management did acknowledge, however, that those delays had negatively impacted both programs.

The inspectors observed field collection of air particulate/iodine samples and noted that the contractor sample collector was well trained in the use of sampling procedures and was very knowledgeable of appropriate sampling principles. The inspectors also noted that the collector properly tested the air sampling train for leakage and labeled and packaged the samples for shipment to the vendor analytic laboratory. The inspectors noted that the material condition of the air sample pumps was generally good, and the

sample collector indicated that the availability of the samplers during 1999 had been excellent.

The inspectors verified that the 1998 Annual Radiological Environmental Operating Report was submitted in accordance with NRC requirements, and that the report contained the required information as prescribed by the ODCM. The report noted that almost all of the required samples had been collected. On those few occasions when air samples had not been collected, the problem was the result of damaged filter media. There were no modifications to the REMP in 1998, and the procedures used remained unchanged. Data recovery for meteorological measurements was excellent (greater than 99 percent).

The REMP program included the collection and analysis of air, water, vegetation, fish, and bottom and shoreline river sediments. Thermoluminescence dosimeters (TLDs) were used to measure direct radiation and were exchanged quarterly. The results from the REMP sampling and analyses, including the analyses of supplemental onsite and offsite groundwater wells, indicated that plant operations did not have a discernable radiological impact on the environment.

The 1998 Annual Radioactive Effluent Release Report indicated that there were 41 radioactive liquid discharges during 1998. Neither the liquid releases nor the gaseous and particulate releases came close to approaching the dose limits specified in the ODCM.

The inspectors reviewed the REMP program interlaboratory cross-check program data for the licensee's environmental sample analysis vendor laboratory. The inspectors reviewed the 1998 results, as described in the 1998 Annual Radiological Environmental Monitoring Report, and the reported results for the 1st, 2nd, 3rd and 4<sup>th</sup> quarters of 1999. The reviews indicated that the vendor laboratory results were all within the acceptance criteria for the known values.

During 1998 and 1999, the licensee made six revisions (Revisions 1.4, 1.7, 1.8, 2.0 (March 1999), 2.0 (April 1999), and 2.1) to the ODCM. The changes were administrative in nature and editorial in content. The inspectors reviewed the 10 CFR 50.59 safety reviews performed for each of the revisions and determined that the reviews met regulatory requirements as well as the licensee's procedural requirements.

c. Conclusions

The REMP program was well implemented and the 1998 and 1999 data demonstrated that there was no discernable environmental impact from plant operations. A self-assessment of the REMP and ODCM programs determined that both programs had suffered administratively due to the lack of management oversight.

## **R2 Status of Radiation Protection and Chemistry Facilities and Equipment**

### **R2.1 Process and Effluent Radiation Monitors**

#### **a. Inspection Scope (84750)**

The inspectors reviewed the 1998 and 1999 process records to determine if process radiation monitors were operational with their alarm/trip set points properly set and had been calibrated per the requirements of the ODCM. The staff responsible for effluent and process monitoring systems were interviewed by the inspectors. Walkdowns of the liquid radioactive waste system were conducted and the collection of an iodine/particulate/noble gas sample from the Unit 2/3 chimney Station Particulate Iodine Noble Gas (SPING) was observed.

#### **b. Observations and Findings**

The inspectors determined that the Unit 2/3 Reactor Vent SPING, Unit 2/3 Chimney SPING, Unit 1 Chimney SPING, Unit 2 Offgas Radiation Monitor, Unit 3 Offgas Radiation Monitor and the Unit 2/3 Riverwater Effluent Radiation Monitor had been operational per the requirements of the ODCM during 1998 and 1999. The inspectors also noted that the effluent monitors had been calibrated at the frequencies required by the ODCM and the set points were properly set.

The inspectors performed a walk down of the liquid radwaste system, observed the waste control panel, the liquid waste storage tanks and several liquid waste monitors. The material condition of the panel and monitors appeared to be excellent. The RP Technical Supervisor accompanied the inspectors during the walk down and was very knowledgeable of the system.

The inspectors observed the collection of an iodine/particulate/noble gas sample from the Unit 2/3 Chimney SPING. The chemistry technicians who collected the sample were well trained and prepared for the task. The technicians referenced the procedure and checklist frequently during the evolution and used the proper radiation protection controls while handling the samples. During sample collection, the technicians noted that the "fail" lamp was lighted on the high range noble gas monitor and notified the system engineer immediately, per the procedural requirements.

The system engineer responsible for the effluent monitors indicated that effluent monitor down-times had been significantly reduced in 1999 and early 2000. Several monitors (Unit 2/3 Chimney SPING and Reactor Vent SPINGs), however, had been having mechanical problems and were being closely monitored and tracked. The licensee indicated that those monitors may be replaced or upgraded in the future.

c. Conclusions

The effluent monitors were operational and calibrated in compliance with the ODCM. All effluent monitors but one had set points established per the requirements of the ODCM. The material condition of the liquid radwaste system was good.

**R5 Staff Training and Qualification in Radiation Protection and Chemistry**

R5.1 REMP Staff Training and Qualifications (84750)

The inspectors reviewed the training records for the vendor contractor who collected the REMP samples and the chemistry technicians who collect effluent samples. The inspectors found that the contractor and the chemistry technicians had been properly trained and had sufficient experience to properly execute the program. Comprehensive training and retraining of personnel were provided to the chemistry technicians, and the course content had been updated. The training program was adequate to ensure compliance with the licensee procedures and regulatory requirements.

**R7 Quality Assurance in Radiation Protection and Chemistry Activities**

R7.1 QA Audits and Assessments

The inspectors discussed the results of the biannual audit of the ODCM/REMP programs with a Nuclear Oversight (NO) lead auditor. Nuclear Oversight audits of the ODCM/REMP programs were performed once every two years. Although the 1998/1999 Audit had been completed prior to the inspection, the results were not available for review. The NO lead auditor indicated that NO had assisted the new ODCM/REMP Coordinator with the self-assessment of the ODCM/REMP programs (Section R1.1). NO had also formally reviewed (Field Observation) the self-assessment report and concluded that the assessment team had produced a very good report. The lead auditor also indicated that the NO audit team had concentrated on areas other than those assessed by the self-assessment team.

R7.2 Problem Identification Form (PIF) Corrective Actions and Resolution

a. Inspection Scope (84750)

The inspectors reviewed the REMP and radiological effluent monitoring program PIFs initiated during 1998 and 1999, which addressed deficiencies in the programs.

b. Observations and Findings

With the exception of the PIFs discussed in Sections R 1.1, the inspectors noted no significant adverse trends in the PIFs reviewed. Most issues were minor in nature and addressed equipment problems or personnel errors. Corrective actions appeared timely and adequate. Several PIFs, however, pointed to weaknesses in the Apparent Cause Evaluation process and the safety review program.

PIF D1999-01055, "Non-Normal Release of Radioactive Liquid," documented an incident in which minimally contaminated condensate water exited the plant via the circulating water system. On February 20, 1999, during the Unit 3 refueling outage (D3R15), the Unit 3 hot well was flooded to assist in checking for and plugging main condenser tube leaks. This had been a common practice during previous outages and the licensee had anticipated only minor leakage from the tubes into the circulating water boxes. However, the tubes had been hydrolazed prior to the flood up resulting in significantly more leaking tubes than had been anticipated. As a result, approximately 12,000 gallons of minimally contaminated condensate water were released into the circulating water system. In addition to the PIF, an Apparent Cause Evaluation (ACE) was performed to determine the apparent cause of the event. The licensee determined that the apparent cause of the incident was the "system design does not allow water released through the leaking tubes to be captured and routed to Radwaste for processing." In addition, "other methods of leak checking were not possible during D3R15 due to time constraints and ongoing work associated with the turbine." The inspectors reviewed the ACE and found it deficient. The inspectors noted that there was no discussion in the ACE regarding possible weaknesses in the planning for the testing nor were there discussions regarding the lessons to be learned from the incident. In addition, the corrective actions recommended in the ACE were limited to reporting the unplanned release in the annual report, determining if future releases could be classified as planned releases, and creating an Action Item to address alternate methods for leak checking. Improving the planning process to prevent future unplanned releases was not identified as an area that warranted improvement. The ACE Quality Checklist used by the staff to evaluate the apparent cause found that the ACE was satisfactory. The inspectors also noted that deficiencies in another RP related ACE had been discussed in Inspection Report No. 50-237/99019; 50-249/99019. Both ACEs were discussed at the exit meeting and management indicated that the ACE developed as a result of PIF D1999-01055 would be revisited.

PIFs D2000-01077, 01078, 01079 and 01080, all identified administrative deficiencies in the 10 CFR 50.59 review for moving the Unit 2/3 Hot Shop into the Unit 1 Turbine Building. The deficiencies included an inadequate capture of Unit Turbine Building effluent releases in the ODCM, misinformation in the ODCM regarding the Unit 1 Turbine Building ventilation system, and the use of an "uncontrolled" document to control effluents from the Unit 1 Turbine Building. When asked about this, RP management and the ODCM/REMP Coordinator indicated that they had not been involved in the safety review process and were unaware that the safety review for the hot shop relocation had been completed. They also indicated that RP input into the safety review had been limited to an evaluation (January 1999) of the potential releases from the Hot Shop based on historical data. RP management indicated that work in the hot shop had been controlled to restrict potential effluent releases. A "Notice" to workers and a radiation work permit (RWP 000018) had been used to accomplish the task. Since the "Notice" was not a controlled document, RP had been tasked with developing a monitoring program for the Hot Shop and the program would have been implemented using a controlled document. RP management indicated that many of the deficiencies identified in the PIFs would have been adverted if RP had been incorporated into the safety review process. The PIFs were discussed at the exit

meeting and management indicated that including RP in the safety review process for radiological issues would be considered.

PIF D2000-00467, "Unusually High Tritium Levels in Onsite Wells" was also reviewed. Dresden Station has an ongoing tritium well water monitoring program. On January 27, 2000, the sample analysis vendor notified that station that tritium levels in samples from four of the on-site wells were unusually high. New samples were subsequently collected and analyzed. The new analyses indicated that the samples in question had been switched prior to analysis. The inspectors reviewed the sample results and the historical data, and concurred with the licensee's findings. The inspectors also noted that the tritium levels in all of the wells had been below the regulatory limits.

c. Conclusions

Condition reports identified issues related to the REMP and radiological effluent monitoring program that were minor in nature, equipment related, or were attributable to personnel error. The corrective actions taken were timely and appropriate. Several PIFs, however, pointed to weaknesses in the Apparent Cause Evaluation process and the 10 CFR 50.59 safety review program.

R7.3 Meteorology Program

a. Inspection Scope (84750)

The inspectors reviewed the 1999 Annual Summary for the meteorology monitoring system.

b. Observations and Findings

The inspectors noted that all surveillances on the meteorology monitoring system had been performed per procedural requirements. The inspectors also noted that all identified meteorology system problems had been addressed in a timely manner. Availability of the meteorology equipment as well as the data collection and transfer capacity of the system was excellent during 1998.

c. Conclusions

Surveillances of the meteorological data collection equipment met the requirements of the ODCM and the Meteorological Monitoring Plan. System availability was excellent.

**R8 Miscellaneous Radiation Protection and Chemistry Issues**

R8.1 (Closed) Inspection Follow-up Item IFI 50-237/98025-01/50-249/98025-01: Review results of the licensee's evaluation of the liquid effluent sampling program for the waste water treatment facility (WWTF). The evaluation and corrective actions included the following: (1) on December 21, 1998, the licensee's chemistry staff initiated a weekly 24 hour composite sampling program to evaluate effluents to the WWTF; (2) the weekly composite program continues as a standing proceduralized operation to assure

monitoring of this potential effluent pathway; and (3) the staff submitted Update Final Safety Analysis Report (UFSAR) change DFL-99-009 February 5, 1999, to identify systems that can drain to WWTF. These evaluations and corrective actions were reviewed by the inspectors and they appear to have been effective. This item is closed.

- R8.2 (Closed) Inspection Follow-up Item IFI 50-237/98025-02/50-249/98025-02: Follow-up on the licensee's evaluation of main control room surveillance data obtained from the effluent monitor control terminals. The evaluation and corrective actions included the following: (1) on October 9, 1998, the erroneous effluent monitor control terminal panel label was removed; (2) by December 1, 1998, all control room operators were interviewed and procedural adherence was confirmed, as opposed to labeling adherence; and (3) a new corrected label was installed at the panel in the control room. These evaluations and corrective actions were reviewed by the inspectors and they appear to have been effective. This item is closed.

## **V. Management Meetings**

### **XI Exit Meeting Summary**

The inspectors presented the inspection results to Mr. Fisher and other licensee management and staff at the conclusion of the site inspection on March 17, 2000. The licensee acknowledged the inspection findings and identified no proprietary information.

## PARTIAL LIST OF PERSONS CONTACTED

D. Ambler, Regulatory Assurance Manager  
P. Boyle, Chemistry Manager  
P. Chabot, Engineering Manager  
D. Fay, ALARA Analyst  
M. Gagnon, Health Physicist, Shipment Specialist  
R. Fisher, Station Manager  
T. Halliday, Radiation Protection Supervisor  
M. Hayse, Nuclear Oversight, Assessment Manager  
R. Kelly, Regulatory Assurance, NRC Coordinator  
R. Melgoza, ALARA Analyst  
J. Moser, Radiation Protection Manager  
D. Nestle, ODCM/REMP Coordinator  
L. Oshier, Radiation Protection Lead Technical Supervisor  
R. Norris, Radiological Engineering Supervisor  
B. Rubak, Regulatory Assurance, Licensing  
W. Stoffels, Maintenance Manager  
J. Stone, Nuclear Oversight Manager  
P. Swafford, Site Vice President

## INSPECTION PROCEDURES USED

IP 84750: Radioactive Waste Treatment, and Effluent and Environmental Monitoring

## ITEMS OPENED, CLOSED AND DISCUSSED

### Opened

None

### Closed

50-237/98025-01	IFI	Review results of the licensee's evaluation of the liquid effluent sampling program for the waste water treatment facility (WWTF) (Section R8.1).
50-249/98025-01		

50-237/98025-03	IFI	Follow-up on the licensee's evaluation of main control room surveillance data obtained from the effluent monitor control terminals (Section R8.2).
50-249/98025-03		

### Discussed

None

## LIST OF ACRONYMS USED

ACE	Apparent Cause Evaluation
NO	Nuclear Oversight
ODCM	Offsite Dose Calculation Manual
PIF	Problem Identification Form
RP	Radiation Protection
REMP	Radiological Environmental Monitoring Program
RWP	Radiation Work Permit
SPING	Station Particulate Iodine Noble Gas
TLD	Thermoluminescence dosimeter
UFSAR	Update Final Safety Analysis Report
WWTF	Waste Water Treatment Facility

## PARTIAL LIST OF DOCUMENTS REVIEWED

### Station Procedures

DCP 1019-01 (Revision 20) Sampling  
DCP 2119-04 (Revision 02) Sewage and Wastewater Treatment  
DCP 2213-01 (Revision 11) Main Chimney

Teledyne Midwest Laboratory "Sampling Procedures Manual," Revision 4, August 11, 1999

### RWPs

RWP # 000018 (Revision 0) Hot Shop Maintenance and Housekeeping Activities

### PIFs

PIFs: D2000-01119, D2000-01077, D2000-01078, D2000-01079, D2000-01080 and D1999-01055 with associated ACE

PIFs: ODCM/REMP related summaries for 1998 and 1999

PIF D1998-05420, "Incomplete information on 923-7 panel placard"

### Other Documents

1998 Annual Radiological Environmental Operating Report

1998 Annual Radioactive Effluent Release Report

NOTICE, "Tool Crib Attendant Routines," July 1, 1995

Memorandum, "RP Memo #99-001 - D1 Main Turbine Floor Effluents," January 4, 1999

Results of Radiochemistry Cross Check Program, 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> Quarters of 1999

Dresden Radiation Protection Department 1<sup>st</sup> Quarter 2000 Focus-Area Self-Assessment Report

NO Field Observation, REMP/ODCM Self-Assessment Report (AR#23365)

ODCM Revisions and 10 CFR 50.59 Safety Reviews 1.4, 1.7, 1.8, 2.0 (April 1999), 2.0 (March 1999) and 2.1

Teledyne Brown Engineering, Record of Training, March 7, 2000

Dresden Chemistry Active Tasks for Training, March 15, 2000

Predefined Parameter Detail for the Unit 2/3 Reactor Vent SPING, Unit 2/3 Chimney Sping, Unit 1 Chimney Sping, Unit 2 Offgas Radiation Monitor, Unit 3 Offgas Radiation Monitor and the Unit 2/3 Riverwater Effluent Radiation Monitor

Dresden UFSAR Section 11.1.8, "Sources Not Normally Part of the Radioactive Waste Management Systems"

NTS 237-100-98-025IFI01, "NRC Inspection Report 50-237/249/98025 Inspectors Follow-up Item 98025-01"

NTS 237-98-43701, "Review Surveillances Performed on SPINGs"