

April 27, 2000

Mr. Robert M. Bellamy
Site Vice President
Entergy Nuclear Generation Company
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, Massachusetts 02360-5599

SUBJECT: PILGRIM INTEGRATED INSPECTION REPORT NO. 05000293/2000-002

Dear Mr. Bellamy:

This refers to the inspection conducted on February 21, 2000, through March 31, 2000, at the Pilgrim Nuclear Power facility. The enclosed report presents the results of this inspection.

During the six weeks covered by this inspection period, the conduct of activities at the Pilgrim facility was characterized by safe plant operation. The decision made by your staff to remove the main generator from the electrical grid to make repairs to the "B" isophase system eliminated the uncertainty involved with a degraded condition of arcing in the isophase system.

The security program was inspected during this period. The inspection consisted of selective reviews of procedures and records, inspector's observations, and interviews with security personnel. No safety concerns or violations were identified. The inspector determined that you were implementing a security program that met regulatory requirements. Also, we noted that the implementation of a Joint Engineering Team and the use of maintenance engineers has improved engineering support of plant operations.

Sincerely,

/RA/

Clifford J. Anderson, Chief
Projects Branch 5
Division of Reactor Projects

Docket No.: 05000293
License No.: DPR-35

Enclosure: Inspection Report 05000293/2000-002

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Electric Power Division

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REGION I

License No.: DPR-35

Report No.: 2000-002

Docket No.: 05000293

Licensee: Entergy Nuclear Generation Company
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Facility: Pilgrim Nuclear Power Station

Inspection Period: February 21, 2000, through March 31, 2000

Inspectors: R. Laura, Senior Resident Inspector
R. Arrighi, Resident Inspector
L. James, Reactor Engineer
P. Frechette, Physical Security Inspector
J. Yerokun, Senior DRS Inspector

Approved by: C. Anderson, Chief
Projects Branch 5
Division of Reactor Projects

EXECUTIVE SUMMARY
Pilgrim Nuclear Power Station
NRC Inspection Report 05000293/2000-002

This integrated inspection included aspects of licensee operations, engineering, maintenance, and plant support. The report covers resident inspection for the period of February 21, 2000, through March 31, 2000. In addition, it includes the results of an announced inspection by a reactor inspector of licensee's engineering activities in support of operations and maintenance during March 6-9, 2000, and a physical security inspector during March 13-17, 2000.

Operations

- Plant Management demonstrated conservative decision making by removing the turbine off line to investigate the abnormal noise coming from the "B" phase isophase system. (Section O1.1)
- The power maneuver to make repairs to the isophase system was deliberate and well controlled. (Section O1.1)
- The inspector concluded that the NSRAC effectively performed a review and audit of station activities and met technical specification requirements. (Section O7.1)

Maintenance

- An alert maintenance planner and system engineer identified an abnormal noise (arcing) coming from the isophase system during a maintenance walk down. (Section O1.1)
- Good procedure adherence was displayed during observed maintenance and surveillance activities. The activities observed and reviewed were performed safely in accordance with approved procedures. (Section M1.1)
- A good questioning attitude was displayed by a maintenance mechanic and follow-up by the licensee to resolve a question regarding the size of bolts used for a high pressure coolant injection restricting orifice flange. (Section M1.1)

Engineering

- The implementation of the Joint Engineering Team and the maintenance engineers has improved the Engineering Department's ability to support the operation and maintenance of the plant by providing timely, direct response to emergent issues. (Section E1.1)

Executive Summary (cont'd)

Plant Support

- Security and safeguards activities with respect to alarm station controls, communications, and protected area access control of personnel and packages were effectively implemented and met licensee commitments and NRC requirements. (Section S1)
- Protected area assessment aids, protected area detection aids, and personnel search equipment were determined to meet the licensee's commitments and NRC requirements. (Section S2)
- Security and safeguards procedures and documentation were properly implemented. Event logs were properly maintained and effectively used to analyze, track, and resolve safeguards events. (Section S3)
- The security force members adequately demonstrated that they had the requisite knowledge necessary to effectively implement their duties and responsibilities. (Section S4)
- Training was conducted in accordance with the training and qualification plan, and was considered effective. (Section S5)
- Management support was adequate to ensure effective implementation of the security program, as evidenced by adequate staffing levels and the allocations of resources to support programmatic needs. (Section S6)
- Audits were comprehensive in scope and depth and findings were reported to the appropriate level of management. The audit program was properly administered. The self-assessment program effectively identified and subsequently resolved potential weaknesses. (Section S7)

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ATTACHMENTS

- Attachment 1 - Inspection Procedures Used
- Items Opened, Closed, and Updated
- List of Acronyms Used

REPORT DETAILS

Summary of Plant Status

Pilgrim Nuclear Power Station (PNPS) began the period at 100 percent core thermal power. On February 23, 2000, reactor power was reduced to approximately 15 percent and the main generator taken off line to repair the "B" phase of the isophase system. After effecting repairs, the unit was returned to full power on February 27, 2000.

I. OPERATIONS

O1 Conduct of Operations¹

O1.1 Inspection Scope (71707)

Using Inspection Procedure 71707, the inspector conducted frequent reviews of ongoing plant operations, including operator evaluations in the control room; walk-down of the main control boards; tours of radiological controlled areas; and observations of management planning meetings. The inspector observed that proper control room staffing was maintained. Shift briefings and turnovers were well conducted with good discussion on compensatory measures and degraded equipment. Management meetings were attended by all departments and discussions included present plant conditions and identified equipment problems.

On February 22, 2000, during a maintenance walk down, a system engineer and a maintenance work planner heard an abnormal noise coming from the "B" phase of the isophase system; the condition was documented in problem report 00.9051. The location of the noise was in a connection box where connection is made from the generator bushing to the isophase bushing. The Plant Manager went to the location of the abnormal noise. Based on the arcing he heard, and knowing that there was hydrogen on the other side of the generator bushing, he decided to take the main generator off line to determine the cause and effect repair.

Operators lowered reactor power to approximately 17 percent in accordance with procedure 2.1.14 when the main turbine experienced high vibrations. Prior to taking the turbine off line, the turbine tripped due to high vibrations and operators entered procedure 2.4.46, "Turbine Bearing Malfunction." The reactor remained on line dumping steam through the main steam bypass valves to the main condenser.

Inspection of the connection box revealed arcing near the point where the isophase bus goes through a baffle bushing. There is a metal collar in the baffle bushing which was covered with some dust and other minor debris. The arcing occurred even though the metal collar is insulated from ground and the isophase bus conductor. The dust and debris provided a path for a potential difference between the metal collar and the isophase bus conductor. Discussions with the vendor identified that there should have

¹Topical headings such as O1, M8, etc., are used in accordance with the NRC standardized reactor inspection report outline. Individual reports are not expected to address all outline topics.

been a bonding spring to make contact between the baffle bushing metal collar and the isophase bus conductor; there was no evidence that the bonding spring was ever installed. Testing with a bonding spring installed showed that a potential difference would not have been present and no arcing would occur.

The licensee inspected the remaining two phases and identified a similar condition. The vendor manual was revised to include the drawing of the bonding springs. The connection boxes were cleaned and bonding springs were attached between the metal collar and the isophase bus conductor for all three phases.

The inspector attended a February 27, 2000, operating shift brief and monitored operator performance during the power ascension activities. The inspector verified that operators followed procedure 2.1.14, "Station Power Changes." Good communications and procedure adherence were observed by the operations staff. No significant problems were noted.

O7 Quality Assurance in Operations

O7.1 Offsite Review Committee Meeting

a. Inspection Scope (71707)

The inspector attended portions of the Nuclear Safety Review and Audit Committee (NSRAC) meeting that was held on March 7 and 8, 2000, to assess the committee performance and compliance with technical specifications.

b. Observations and Findings

The inspector verified that a quorum of the NSRAC attended the March 2000 meeting. The VP Operations and Station Director and the General Manager Technical were also noted to be in attendance for portions of the meeting. During the meeting, topics discussed included challenges facing the various departments and how they are being addressed. Based on observed discussions, the inspector determined that there was a good exchange of information between the plant staff and the NSRAC members.

c. Conclusions

The inspector concluded that the NSRAC effectively performed review and audit of station activities and met technical specification requirements.

II. MAINTENANCE

M1 Conduct of Maintenance

M1.1 General Maintenance and Surveillance

a. Inspection Scope (61726/62707)

The inspector observed portions of selected maintenance and surveillance activities to verify that the applicable procedures and technical specifications were satisfied.

b. Observations and Findings

The inspector observed all or portions of the following activities:

8.M.2-2.6.4, "RCIC Steam Line Low Pressure"

MR19901563, Repair leak from high pressure coolant injection (HPCI) restricting orifice RO-2301-62B

c. Conclusions

Good procedure adherence was displayed during observed maintenance and surveillance activities. The activities reviewed were performed safely and in accordance with approved procedures. A good questioning attitude was displayed by a maintenance mechanic and follow up by the licensee to resolve a question regarding the size of bolts used for a HPCI restricting orifice flange.

M6 Maintenance Organization and Administration

M6.1 Work Control

a. Inspection Scope

A review of the maintenance work control process was performed focusing on the recent history of work completed during the work week (T-0) compared to work scheduled three weeks prior to the work week (T-3). This is a performance measure that can be used to determine the overall effectiveness of work control.

b. Observations and Findings

Several work items were not worked that were scheduled to work at T-3 when the work scope was established. The inspector discussed and reviewed several specific items that had been removed. The licensee informed the inspector that this information was routinely assessed in the work week manager report. The inspector reviewed several work week manager reports and noted that the licensee is working to improve the consistency between the work scope established at T-3 compared to the actual work

completed at T-0. No significant safety related problems were identified by the inspector.

c. Conclusions

Some maintenance work items were not worked at T-0 that were included at T-3 when the work scope was established. Work week manager reports reviewed these items to assess why these items were deferred.

III. ENGINEERING

E1 Conduct of Engineering

E1.1 Engineering Support to Operations

a. Inspection Scope (37550)

The inspector evaluated the licensee's engineering activities in support of operations and maintenance, through examining the function and implementation of the engineering rapid response team and maintenance engineers. The rapid response team is called the Joint Engineering Team (JET). The inspector also reviewed maintenance requests (MRs) that are on engineering hold and interviewed operations and maintenance personnel regarding the support provided by engineering.

b. Observations and Findings

Joint Engineering Team and Maintenance Engineers

The licensee has experienced significant changes in the past year, including a new license holder, Entergy, and new structure and personnel within the engineering department. Within the past six months, the engineering department had begun implementing two efforts designed to provide more direct and timely support of maintenance and operations: the Joint Engineering Team and maintenance engineers.

The mission of the JET is to resolve day-to-day emergent items to preserve the long term engineering schedule. The initial implementation (pilot project) of the team demonstrated the JET's effectiveness in addressing emergent issues. The pilot project also clarified the structure and discipline makeup for the full JET implementation. Since implementation on November 19, 1999, the JET responded to approximately 280 requests including performing walk downs of specific areas or systems, providing post work testing requirements, and revising vendor manuals. The inspector noted that while the JET team used the established station procedures to perform its duties, the specific roles and responsibilities of the JET has not been proceduralized.

The mission of the maintenance engineers is to provide direct engineering support to their assigned maintenance team for resolution of technical issues affecting the completion of MRs. The maintenance personnel interviewed indicated that the interface between the engineering and maintenance departments significantly improved as a

result of: (1) a single point of contact for each maintenance team, and (2) the maintenance team lead's input into the priorities of their respective maintenance engineer. As noted with the JET team, the roles and responsibilities of the maintenance engineers has not been proceduralized.

Maintenance Requests on Engineering Hold

The inspector reviewed the maintenance requests (MRs) that were on engineering hold with the engineering managers. Of the approximately 55 MRs on engineering hold, eight (~15%) did not have pending engineering products. For example, MR #10000153 documented the need to restore the heating system to the retube building because the sprinkler system could not be filled due to low temperatures. This MR was listed as being on engineering hold; however, station services needs to first develop a resolution. A second example was MR #19500497, which documented the need to install Gaitronics that can be heard during operation in the gas generator building. The plant design change for the new Gaitronics had been completed in the Fall 1999; however, the MR status still indicated engineering hold as of March 9, 2000.

The inspector concluded that the number of MRs being tracked on engineering hold was not representative of the maintenance work that actually required an engineering product or input. The licensee's engineering managers identified similar miscoding issues and were in the process of working with maintenance/work control to create additional MR status codes to better show the actual cause of work being placed on hold. The inspector further noted that the MR status codes were not listed in the work control process procedures to provide guidance on use of appropriate codes.

Engineering Self-Assessment and Root Cause Analysis

The inspector reviewed the self-assessment and subsequent root cause analysis that were conducted in response to numerous problem reports, NRC report observations, and the NRC Plant Performance Review letter. The root cause analysis identified three areas that need improvement: (1) the roles and responsibilities of managers, supervisors, and engineers need to be clearly documented (2) the modification team interface with maintenance and operations needs to be enhanced, and (3) an integrated engineering schedule to manage work flow within the engineering department and to improve support required from the maintenance and operation departments needs to be developed. The inspector concluded that the root cause analysis was thorough and the corrective actions identified were appropriate.

c. Conclusions

The implementation of the Joint Engineering Team and the maintenance engineers has improved the Engineering Department's ability to support the operation and maintenance of the plant by providing timely, direct response to emergent issues.

IV. PLANT SUPPORT

S1 Conduct of Security and Safeguards Activitiesa. Inspection Scope (81700)

Determine whether the conduct of security and safeguards activities met the licensee's commitments in the NRC-approved security plan (the Plan) and NRC regulatory requirements. The security program was inspected during the period of March 13-16, 2000. Areas inspected included: alarm stations; communications; protected area (PA) access control of personnel and packages.

b. Observations and Findings

Alarm Stations. Multiple observations of operations in both alarm stations provided verification that the alarm stations were equipped with appropriate alarms, surveillance and communications capabilities. Interviews with the alarm station operators found them knowledgeable of their duties and responsibilities. It was also verified, through observations and interviews, that the alarm stations were continuously manned, independent and diverse so that no single act could remove the capability for detecting a threat and calling for assistance, and the alarm stations did not contain any operational activities that could interfere with the execution of the detection, assessment and response functions.

Communications. Document reviews and discussions with alarm station operators, demonstrated that the alarm stations were capable of maintaining continuous intercommunications, communications with each security force member (SFM) on duty, and were exercising communication methods with the local law enforcement agencies as committed to in the Plan.

PA Access Control of Personnel, Vehicles, and Hand-Carried Packages and Material. On March 14, 2000, personnel and package search activities were observed at the personnel access portal. It was determined that positive controls were in place to ensure only authorized individuals were granted access to the PA, that all personnel and hand carried items entering the PA were properly searched.

c. Conclusions

Security and safeguards activities with respect to alarm station controls, communications, and protected area access control of personnel and packages were effectively implemented and met licensee commitments and NRC requirements.

S2 Status of Security Facilities and Equipmenta. Inspection Scope (81700)

Areas inspected were: PA assessment aids, PA detection aids, personnel search equipment and testing, maintenance and compensatory measures.

b. Observations and Findings

PA Assessment Aids. On March 15, 2000, the effectiveness of the assessment aids was evaluated, by observing on closed circuit television, a walk down of the entire perimeter of the PA. The assessment aids had generally good picture quality and zone overlap. Additionally, to ensure Plan commitments are satisfied, the licensee has procedures in place requiring the implementation of compensatory measures in the event the alarm station operators are unable to properly assess the cause of an alarm.

Personnel and Package Search Equipment. On March 14, 2000, both routine use and performance testing of the licensee's personnel and package search equipment were observed. Observations and procedural reviews indicated that the search equipment performed in accordance with licensee procedures and Plan commitments.

PA Detection Aids. Multiple observations of an SFM conducting performance testing of the perimeter intrusion detection system (PIDS) were conducted. The testing consisted of multiple intrusion attempts in every zone. The appropriate alarms were generated in each attempt. The equipment was functional and effective and met the requirements of the Plan.

c. Conclusions

The licensee's security facilities and equipment were determined to meet the licensee's commitments and NRC requirements.

S3 Security and Safeguards Procedures and Documentationa. Inspection Scope (81700)

Areas inspected were: implementing procedures and security event logs.

b. Observations and Findings

Security Program Procedures. Verification that the procedures were consistent with the Plan commitments, and were properly implemented was accomplished by reviewing selected implementing procedures associated with PA access control of personnel, packages and materials, testing and maintenance of personnel search equipment and performance testing of PA detection aids.

Security Event Logs. The Security Event Logs for the previous twelve months were reviewed. Based on this review, and discussion with security management, it was

determined that the licensee appropriately analyzed, tracked, resolved and documented safeguards events that the licensee determined did not require a report to the NRC within 1 hour.

c. Conclusions

Security and safeguards procedures and documentation were being properly implemented. Event Logs were being properly maintained and effectively used to analyze, track, and resolve safeguards events.

S4 Security and Safeguards Staff Knowledge and Performance

a. Inspection Scope (81700)

Area inspected was: security staff requisite knowledge

b. Observations and Findings

Security Force Requisite Knowledge. Observations of a number of SFMs in the performance of their routine duties were conducted during the inspection period. These observations included alarm station operations, personnel, vehicle and package searches, and performance testing of the PIDS. Additionally, interviews of SFMs were conducted. Based on the responses, it was determined that the SFMs were knowledgeable of their responsibilities and duties, and could effectively carry out their assignments.

c. Conclusions

The SFMs adequately demonstrated that they had the requisite knowledge necessary to effectively implement the duties and responsibilities associated with their position.

S5 Security and Safeguards Staff Training and Qualification

a. Inspection Scope (81700)

Areas inspected were security training and qualifications, and training records.

b. Observations and Findings

Security Training and Qualifications. On March 16, 2000, seven randomly selected training and qualification (T&Q) records of SFMs were reviewed. Physical and requalification records were inspected for armed and supervisory personnel. The results of the review indicated that the security force was being trained in accordance with the approved T&Q plan.

Training Records. Review of training records indicated that the records were properly maintained, accurate and reflected the current qualifications of the SFMs.

c. Conclusions

Security force personnel were being trained in accordance with the requirements of the T&Q Plan. Training documentation was properly maintained and accurate and the training provided by the training staff was effective.

S6 Security Organization and Administration

a. Inspection Scope (81700)

Areas inspected were: management support, effectiveness and staffing levels.

b. Observations and Findings

Management Support. Review of program implementation since the last program inspection disclosed that adequate support and resources continued to be available to ensure program implementation.

Staffing Levels. The total number of trained SFMs immediately available on shift met the minimum requirements specified in the Plan and implementing procedures. No performance issues were noted in the areas inspected.

c. Conclusions

The level of management support was adequate to ensure implementation of the security program, and was evidenced by the allocation of resources to support programmatic needs.

S7 Quality Assurance (QA) in Security and Safeguards Activities

a. Inspection Scope (81700)

Areas inspected were: audits, problem analyses, corrective actions and effectiveness of management controls.

b. Observations and Findings

Audits. A review of both the annual physical security and the access authorization program audits was conducted. The audits were thorough and in-depth. The audit teams included technical specialists from other utilities. None of the audit findings were indicative of programmatic issues.

Problem Analyses. A review of data derived from the security department's self-assessment program was accomplished. Potential weaknesses were being properly identified, tracked, and trended.

Corrective Actions. A review of the corrective actions implemented by the licensee in response to the 1999 QA audit and self-assessment program indicated that the corrective actions were technically sound and were performed in a timely manner.

Effectiveness of Management Controls. The licensee had programs in place for identifying, analyzing and resolving problems. They included the performance of annual QA audits, a departmental self-assessment program and the use of industry data such as violations of regulatory requirements identified by the NRC at other facilities, as a criterion for self-assessment.

c. Conclusions

The review of the licensee's audit program indicated that the program was being properly administered. In addition, a review of the documentation applicable to the self-assessment program indicated that the program was being effectively implemented to identify and resolve potential weakness.

V. MANAGEMENT MEETINGS

X1 Exit Meeting Summary

The inspectors met with licensee representatives at the conclusion of the inspection on April 11, 2000. At the time, the purpose and scope of the inspection were reviewed, and preliminary findings were presented. The licensee acknowledged the preliminary findings presented by the inspectors at the exit.

ATTACHMENT 1

INSPECTION PROCEDURES USED

IP 37550: Engineering
IP 37551: Onsite Engineering
IP 40500: Effectiveness of Licensee Controls in Identifying, Resolving, and Preventing Problems
IP 61726: Surveillance Observation
IP 62707: Maintenance Observation
IP 71707: Plant Operations
IP 71750: Plant Support Activities
IP 81700: Physical Security Program for Power Reactors
IP 82301: Evaluation of Exercises for Power Reactors
IP 92700: Onsite Followup of Written Reports of Nonroutine Events at Power Reactor Facilities
IP 92901: Followup - Operations
IP 92902: Followup - Maintenance
IP 92903: Followup - Engineering
IP 92904: Followup - Plant Support
IP 93702: Prompt Onsite Response to Events at Operating Power Reactors

ITEMS OPENED, CLOSED, AND UPDATED

None

LIST OF ACRONYMS USED

CCTV	closed circuit television
DRP	Division of Reactor Projects
IDS	intrusion detection system
IR	Inspection Report
JET	Joint Engineering Team
LCO	Limiting Condition of Operation
MR	Maintenance Requests
NRC	Nuclear Regulatory Commission
NRR	Office of Nuclear Reactor Regulation
PA	protected area
PDR	Public Document Room
PNPS	Pilgrim Nuclear Power Station
PR	Problem Report
PWT	Post Work Test
QA	quality assurance
RFO	Refueling Outage
SFM	security force member
T&Q	training and qualification
the Plan	NRC-approved physical security plan
VIO	Violation