UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8931

May 1, 2000

Southern Nuclear Operating Company, Inc.
ATTN: Mr. J. B. Beasley
Vice President
Vogtle Electric Generating Plant
P. O. Box 1295
Birmingham, AL 35201

SUBJECT: NRC INTEGRATED INSPECTION REPORT NOS. 50-424/00-02 AND 50-425/00-02

Dear Mr. Beasley:

This refers to the inspection conducted February 20, 2000, through April 1, 2000, at the Vogtle Units 1 and 2 reactor facilities. The enclosed integrated report presents the results of that inspection. During the inspection period, your conduct of activities at the Vogtle facility was generally characterized by safety-conscious operations, sound engineering and maintenance practices, and appropriate radiological work controls.

Based on the results of this inspection, the NRC has determined that a violation of NRC requirements occurred. This violation is being treated as a Non-Cited Violation, consistent with Section VII.B.1.a of the Enforcement Policy. This NCV is described in the subject inspection report. If you contest the violation or the severity of this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with copies to the Regional Administrator, Region II, and the Director, Office of Enforcement, USNRC, Washington, D.C. 20555-0001.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures, will be placed in the NRC Public Document Room.

Sincerely,

/RA/
Stephen J. Cahill, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Docket Nos. 50-424 and 50-425
License Nos. NPF-68 and NPF-81

Enclosure: NRC Integrated Inspection Report
50-424/00-02 and 50-425/00-02

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OFFICE	RII:Vogtle	RII:Vogtle	RII:DRP	RII:DRS	RII:DRS	RII:DRS	RII:DRS
SIGNATURE	SJC (for)	SJC (for)	BLH	JK	GSalyers	BS	BLH (for)
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DATE	4/28/00	4/28/00	5/01/2000	5/01/2000	5/01/2000	5/01/2000	5/01/2000
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U. S. NUCLEAR REGULATORY COMMISSION (NRC)

REGION II

Docket Nos. 50-424 and 50-425

License Nos. NPF-68 and NPF-81

Report No: 50-424/00-02 and 50-425/00-02

Licensee: Southern Nuclear Operating Company, Inc.

Facility: Vogtle Electric Generating Plant Units 1 and 2

Location: 7821 River Road
Waynesboro, GA 30830

Dates: February 20, 2000 through April 1, 2000

Inspectors: J. Zeiler, Senior Resident Inspector
K. O'Donohue, Resident Inspector
B. Holbrook, Regional Inspector (Section O7)
J. Kreh, Regional Inspector (Sections P4.1 and 4.2)
G. Salyers, Regional Inspector (Sections P4.1 and 4.2)
B. Sartor, Regional Inspector (Sections P4.1 and 4.2)
M. Scott, Regional Inspector (Section O7)

Approved by: Stephen J. Cahill, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Enclosure

EXECUTIVE SUMMARY

Vogtle Electric Generating Plant Units 1 and 2
NRC Inspection Report 50-424/00-02 and 50-425/00-02

This integrated inspection included aspects of licensee operations, engineering, maintenance, and plant support. The report covers a six-week period of resident inspection; in addition, it includes findings from a Corrective Action inspection conducted March 13-24, 2000, and an emergency preparedness exercise inspection conducted March 28-31, 2000.

Operations

- The licensee had satisfactorily identified and corrected deficiencies associated with risk and safety significant equipment. Audits reviewed were appropriate. Trend Reports to management were detailed and contained sound recommendations for improvement. Self-assessments were thorough and identified areas for improvement. However, some self-assessment line items were not identified as condition reports. Two departments did not perform a Special Assessment which would have provided for early licensee identification of areas for improvement (Section O7).

- During the January 27, 2000, Technical Specification surveillance testing of the Unit 1 Turbine Driven Auxiliary Feedwater Pump, operators failed to recognize that pump performance acceptance criteria was not met. The pump was inoperable due to a speed controller malfunction until the degraded pump performance was detected during the next scheduled surveillance test on February 25, 2000. The failure to promptly identify and correct the condition adverse to quality was identified as a non-cited violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action (Section O8.1).

Engineering

- Decisions regarding the Maintenance Rule classification of systems and components and for establishing corrective actions and performance goals were made appropriately. The Maintenance Rule program was effectively managed and properly implemented (Section E4.1).

Plant Support

- The licensee's performance during a biennial emergency exercise was competent, and the exercise constituted a successful demonstration of the licensee's emergency response capabilities. Emergency declarations were correct and timely, and offsite notifications were initiated within 15 minutes. Command and control in each of the emergency response facilities was effective. Staffing of emergency response facilities was timely (Section P4).

Report Details

Summary of Plant Status

Unit 1 operated at essentially 100% Rated Thermal Power (RTP) throughout the inspection period.

Unit 2 operated at essentially 100% RTP throughout the inspection period except for a reduction to 65% RTP on March 25 to replace the 2B Main Feedwater Pump Turbine speed sensor.

I. Operations

O1 Conduct of Operations

O1.1 General Observations of Operations Activities (71707)

The inspectors conducted routine control room tours and attended operations shift turnovers and daily management plant status meetings. Operator logs were reviewed to verify compliance with Technical Specifications (TS). Instrumentation, computer indications, and safety system lineups were periodically reviewed to assess system availability. No problems were identified in the above areas.

O2 Operational Status of Facilities and Equipment

O2.1 Engineered Safety Feature System Walkdowns (71707)

The inspectors used Inspection Procedure 71707 to walk down accessible portions of the Unit 1 Auxiliary Feedwater system. Equipment operability, material condition, and housekeeping were acceptable. The inspectors identified no substantive concerns as a result of this walkdown.

O7 Quality Assurance in Operations

O7.1 Problem Identification and Resolution (40500)

The inspectors reviewed the licensee's Condition Reporting System procedure for identifying and correcting deficiencies. The inspectors also reviewed selected Condition Reports (CRs) and trend reports to evaluate the licensee's ability to identify, characterize, track, and correct deficiencies. Trend reports were clear, detailed, and self-critical. Reports were structured to identify adverse performance trends and potential adverse trends the licensee had previously identified. Licensee management had initiated appropriate actions to correct any adverse trends. The inspectors noted that the graded severity levels of CRs were appropriate and determined that the amount of voided condition reports was reasonable. The inspectors concluded that the licensee had satisfactorily identified and corrected deficiencies associated with risk and safety significant equipment.

O7.2 Audits and Self-Assessments

a. Inspection Scope (40500)

The inspectors assessed audits, self-assessments and corrective action items. The inspectors reviewed six onsite audits performed by Safety Audit and Engineering Review (SAER). Three of these were audits for the corrective action program. The inspectors also reviewed three self-assessments completed within the past two years.

b. Observations and Findings

The inspectors observed that the audits were thorough and identified areas for improvement. Audit findings were consistent with other licensee corrective action programmatic self-assessment findings. A February 3, 2000, SAER audit identified three findings, two comments and two recommendations. The inspectors reviewed the associated corrective action items and observed that the items were either closed or being actively worked.

Site procedures recommended Special Assessments be performed at least once per year and provided other specific recommended frequencies for departmental assessments. The inspectors noted that there were no Special Assessment for either Fire Protection and Emergency Preparedness in 1999. The inspectors also noted that the most recent Quarterly Trend Report, dated March 3, 2000, indicated an increasing trend in fire protection procedure violations the first three quarters of 1999. Additionally, the inspectors reviewed the Emergency Preparedness Critique Reports for the past two years and noted that the Critique of Annual Exercise - August 04, 1999, identified that three objectives were not met and one was identified as an objective weakness. Special Assessments in these two areas would have provided an earlier opportunity for licensee identification of areas for improvement.

The inspectors reviewed an Operation Department Self-assessment dated July 26, 1999, and observed that several specific line items were not captured in the CR system. The inspectors discussed these observations with licensee personnel who stated that it was management's expectation that the items be in the CR system. The inspectors noted that some items were already being addressed by licensee management under existing performance improvement initiatives.

The inspectors noted that the training feedback process from students was effective. Feedback comments, with respect to training program methodology and content, were promptly reviewed, assessed, and appropriately implemented.

c. Conclusions

Audits reviewed were appropriate. Trend Reports to management were detailed and contained sound recommendations for improvement. Self-assessments were thorough and identified areas for improvement. However, some self-assessment line items were not identified as CRs. Special Assessments were not performed for either Fire Protection and Emergency Preparedness which would have provided for early licensee identification of areas for improvement.

O7.3 Corrective Actions-Commitment Tracking and Followup (40500)

The inspectors reviewed commitment identification and tracking procedures and reviewed selected corrective action items associated with commitments for completeness and proper closure. The inspectors also reviewed procedures for federal and state reporting and posting requirements and reviewed licensee actions for closing Licensee Event Reports (LERs). The inspectors concluded that the licensee tracked, corrected, and closed commitments and LERs in accordance with plant procedures.

O7.4 Review of Operating Experience Feedback (40500)

The inspectors reviewed appropriate procedures related to the Operating Experience Program and assessed licensee performance for implementation of these procedures. The inspectors reviewed selected NRC Information Notices, Generic Letters, Vendor Service Information Correspondence and 10 CFR 21 Reports. The inspectors did not identify any discrepancies and concluded that the licensee met the procedural requirements for review of operating experience feedback.

O7.5 Plant Review Board (PRB) Activities (40500)

The inspectors reviewed PRB procedures and randomly selected safety-related design changes; plant procedure revisions; 10 CFR 50.59 Evaluations; Self-Assessments and Audit Reports; and LERs and verified that the documents were reviewed by the PRB. The inspectors reviewed PRB meeting minutes for the last two years and observed that Corrective Action Reports, Special Reports, and NRC Violation Responses were also reviewed and discussed. Senior management reviewed safety and risk significant changes and provided oversight for nuclear safety policies and programs. Management personnel were cognizant of site performance through routine and Special Reports. The inspectors concluded that the PRB met the requirements of the Updated Final Safety Analysis Report and site procedures.

O7.6 Event Investigation Reports (40500)

The inspectors reviewed the applicable site procedures and selected five event investigation reports for review. The inspectors reviewed the reports for effective identification of root causes, and appropriate recommendations to prevent recurrence. The inspectors also reviewed equipment operability determinations. The inspectors determined that the investigation reports were thorough and identified appropriate root causes. The recommended actions to prevent recurrence were sound and comprehensive. Selected corrective action items reviewed were appropriate and completed. Equipment operability determinations were detailed, appropriate, and supported by strong technical data and analysis.

O7.7 Equipment Performance and 10 CFR 50.59 Evaluations

a. Inspection Scope (40500)

The inspectors reviewed 50.59 evaluations; work orders for risk and safety significant systems for completeness of corrective action and rework; risk sensitive severity level three and four CRs for appropriate severity level; voided condition reports to verify that significant items were acted upon; and corrective actions for equipment classified as Maintenance Rule (MR) (a)(1) status.

b. Observations and Findings

For equipment classified as MR (a)(1) status, the corrective actions were timely and appropriate. The inspectors reviewed action items (AI) that were products of CRs. These AIs were tracked to completion with acceptable enhancement actions or corrective actions. When required, the AIs were given time extensions in accordance with site procedures under Nuclear Safety and Compliance (NSAC) administrative controls. The inspectors found no extensions that significantly impacted work or operational readiness of safety or risk significant equipment.

The selected 10 CFR 50.59 evaluations reviewed were thorough, and appropriately supported by technical data. Licensing basis documents were satisfactorily identified, reviewed, and assessed and no unreviewed safety questions were identified.

c. Conclusions

Equipment in MR (a)(1) status was properly assessed, corrected, and monitored to ensure availability and reliability; and the corrective actions were timely and appropriate. The 10 CFR 50.59 evaluations reviewed were thorough, supported by sound technical basis, and appropriately evaluated for unreviewed safety questions.

O8 Miscellaneous Operations Issues (92901)

O8.1 (Closed) Licensee Event Report (LER) 50-424/00-001, Auxiliary Feedwater Pump Inoperable for Longer Than Allowed By Technical Specifications

The inspectors reviewed the circumstances related to the Unit 1 Turbine Driven Auxiliary Feedwater (TDAFW) Pump inoperability from January 27 to February 25, 2000. Inspection efforts included interviews with licensee personnel and review of LER 1-00-001 and CRs 2000000307, 2000000309 and 2000000366.

On February 25, 2000, during the performance of surveillance procedure 14546-1, Turbine Driven Auxiliary Feedwater Pump Operability Test, Revision 19, the Unit 1 TDAFW pump failed to achieve the minimum required pump differential pressure of 1662 psid at the 100 percent speed demand setpoint. During troubleshooting, the licensee identified that the turbine speed controller had drifted due to a resistance change in one of the speed controller's potentiometers. The potentiometer was adjusted and surveillance 14546-1 was re-performed successfully. However, previous

test results from surveillance 14546-1 performed on January 27, 2000, also identified that the pump had failed to meet the acceptance criteria for pump differential pressure. The differential pressure recorded in the January 27 procedure was 1630 psid. Operations personnel had failed to recognize that the test acceptance criteria was not met when the procedure results were initially reviewed and approved. In addition, the AFW system engineer had missed an opportunity to identify the discrepancy during an initial review of the January 27 test results and had concluded that operations had made a typographical error in recording the data.

Technical Specification Surveillance Requirement 3.7.5.2 requires that a developed head (i.e., pump differential pressure) of each AFW pump at the flow test point is greater than or equal to the required developed head. Multiple reviews of the January 27 TDAFW surveillance test results by both Operations and Engineering personnel failed to identify that the surveillance acceptance criteria was not met. This condition adverse to quality existed for 29 days and 8 hours until the surveillance was performed unsuccessfully again on February 25.

The licensee performed an engineering evaluation, Request for Engineering Assistance (REA) 00-V1A619, and determined that the as-found flow was adequate to meet the design requirements of the AFW system. The inspectors reviewed the engineering evaluation and did not identify any issues with the assumptions and conclusions.

The licensee's corrective actions included corrective maintenance on the degraded potentiometer, additional preventive maintenance on all TDAFW pump speed control potentiometers, and counseling operations personnel on the failure to recognize that the surveillance acceptance criteria was not met. The inspectors determined that corrective actions adequately addressed the root causes.

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. Contrary to the above, between January 27, 2000, and February 25, 2000, a condition adverse to quality existed when the Unit 1 TDAFW pump failed to meets its minimum required developed head. During that time, measures were not established to ensure that the condition adverse to quality was promptly identified and corrected until February 25, 2000, when the licensee recognized that surveillance test results did not meet the acceptance criteria.

Consistent with Section VII.B.1.a of the NRC Enforcement Policy, this Severity Level IV violation is identified as Non-Cited Violation (NCV) 50-424/00-02-01, Failure to Promptly Identify and Correct Degraded Turbine Driven Auxiliary Feedwater Pump Flow Condition. This violation is in the licensee's corrective action program as CRs 2000000307, 2000000309 and 2000000366. There was minimal safety consequence associated with the actual degraded condition of the TDAFW pump; however, there were missed opportunities by both operations and engineering to identify the adverse condition in a more timely manner.

II. Maintenance

M1 Conduct of Maintenance

M1.1 General Observations of Maintenance and Surveillance Activities (61726)(62707)

The inspectors observed or reviewed portions of selected maintenance and surveillance activities in progress. This included the following: 1) replacement of circuit card in Unit 2 main feedwater regulating valve 2FV-0150, 2) monthly operability test of the 1B Emergency Diesel Generator, 3) troubleshooting Unit 1 120 Volt AC Inverter 1BD1I2 failure, 4) calculation of Unit 1 Quadrant Power Tilt Ratio, 5) replacement of Unit 2, Train C, 125 Volt Vital Battery Cell Number 46, 6) system outage maintenance on the 1B Centrifugal Charging Pump, and, 7) engineering assisted troubleshooting to identify source of air intrusion on the Unit 2 Safety Injection Pump discharge piping.

For those maintenance and surveillance activities observed or reviewed, the inspectors determined that the activities were conducted in a satisfactory manner and that the work was properly performed in accordance with approved maintenance work orders and procedures and by qualified personnel knowledgeable of their assigned tasks. Problems encountered during the performance of activities were properly resolved.

III. Engineering

E1 Conduct of Engineering

E1.1 General Observations (37551)

The inspectors observed Engineering support activities for Condition Report evaluations, review of plant equipment problems and associated corrective action plans. Engineering activities reviewed were thorough and technically viable. Plant equipment problems were being addressed commensurate with plant safety.

E4 Engineering Staff Knowledge and Performance

E4.1 Maintenance Rule Implementation (62707)

The inspectors conducted a review and assessment of recent functional failures for the following systems and components:

- 25 Kilovolt AC System
- 120 Volt AC System
- Component Cooling Water System
- Emergency Diesel Generator
- Control Rod System
- Safety Injection System

The inspectors reviewed the completed CRs for each equipment failure and interviewed system engineers, and the Maintenance Rule Coordinator. The inspectors reviewed availability and reliability performance indicators and criteria for each system.

For each system or component, the inspectors determined that the process for identifying, trending, and evaluating equipment failures was consistent with the Maintenance Rule and the licensee's program. Appropriate decisions were made in each case regarding classification of the systems and components as MR (a)(1) or MR (a)(2), and for establishing corrective actions and performance goals. The inspectors concluded that the Maintenance Rule program was being effectively implemented.

IV. Plant Support

P4 Staff Knowledge and Performance in Emergency Preparedness (EP)

P4.1 Review of Exercise Objectives and Scenarios for Power Reactors (82302)

The complete scenario package for the March 29 Emergency Plan drill was submitted to the NRC on January 5, 2000. The exercise scenario was of sufficient detail and challenge to demonstrate the exercise objectives and test the licensee's onsite and offsite emergency organizations. A summary of the exercise scenario is included as an attachment to this report.

P4.2 Evaluation of Exercises for Power Reactors

a. Inspection Scope (82301)

During the period March 28-31, 2000, the inspectors observed and evaluated the licensee's conduct and self-assessment of the biennial emergency preparedness exercise. Licensee activities inspected during the exercise included those occurring in the Control Room Simulator, Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF). The inspectors evaluated licensee recognition of abnormal plant conditions, classification of emergency conditions, notification of offsite agencies, development of protective action recommendations, command and control, communications, adherence to Emergency Implementing Procedures (EIPs), and the overall implementation of the licensee's Emergency Plan.

b. Observations and Findings

The initiating event was a small steam generator (SG) tube leak. The Shift Superintendent (SS) correctly classified and declared an Alert in response to a 500 gpm SG tube rupture. The Alert declaration was timely, as was the notification of offsite agencies. The SS turned over the duties of Emergency Director (ED) to the Plant General Manager after the TSC was activated. Both individuals serving as ED exhibited effective command and control.

The TSC was activated at 9:45 a.m. The TSC staff functioned effectively in classifying the Site Area Emergency and the General Emergency. The command and control of the TSC Manager was effective throughout the exercise. Areas for improvement identified by the licensee focused on clarifying the need for early dismissal versus site evacuation as an onsite protective action recommendation. The OSC was well organized and was effective in briefing and preparing teams for dispatch.

The EOF was activated on declaration of the Site Area Emergency. A General Emergency was declared by the ED. Offsite notifications were made from the EOF within 15 minutes, as required. The licensee used procedures correctly in making a prompt and accurate offsite Protective Action Recommendation (PAR). The licensee maintained communications with the State of Georgia and South Carolina representatives in the EOF, keeping them informed of changing plant conditions and mitigative actions being considered. The staff functioned efficiently and professionally. Command and control of operations by the EOF Manager was effective. Periodic informative status briefings were provided to the EOF workgroup coordinators and offsite-agency representatives.

Following the exercise, the licensee conducted facility critiques in which the participants assessed their performance and identified areas for improvement. Subsequently, the licensee's controller/evaluator organization held detailed discussions and reviewed documentation to develop its critique results.

c. Overall Exercise Conclusions

The licensee's performance in responding to the simulated emergency was competent, and the exercise constituted a successful demonstration of the licensee's emergency response capabilities. Emergency declarations were correct and timely, and offsite notifications were initiated within 15 minutes. Command and control in each of the emergency response facilities was effective. Staffing of emergency response facilities was timely.

R1 Radiological Protection and Chemistry Controls

R1.1 General Comments (71750)

The inspectors routinely observed radiologically controlled areas to verify adequacy of access controls, locked areas, personnel monitoring, surveys, and postings. The inspectors also routinely reviewed primary and secondary chemistry results.

Radiological controls were adequate. Radiological areas were properly posted and high radiation areas were labeled. Personnel were attentive and followed radiological requirements. The licensee provided thorough management oversight of radiological and chemistry activities.

S1 Conduct of Security and Safeguards Activities

S1.1 General Observations of Security and Safeguards Activities (71750)

The inspectors periodically toured the protected area and observed visitor escorting, the use of special purpose detectors at the protected area entrance, and personnel, packages, and vehicles entering the protected area. The inspectors determined that the security fence was intact and the isolation zones were being adequately maintained free of objects. Visitor escorting and special purpose detectors were used as applicable before personnel or package entry.

S8 Miscellaneous Security Issues

S8.1 (Closed) Violation (VIO) 50-424,425/01011, Discrimination for Engaging in Protected Activities (92904)

(Closed) VIO 50-424,425/02011, Discrimination for Engaging in Protected Activities

The effectiveness of the licensee corrective action for these issues has previously been evaluated by the staff as acceptable. Consequently, these violations are closed for record purposes; however, the staff will continue to monitor plant specific indicators related to discriminatory employment practices. These indicators include, in part, allegations of discrimination reported to the NRC and proceedings initiated as a result of complaints made to the Department of Labor alleging discrimination for engaging in protected activities.

V. Management Meetings and Other Areas

X1 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on April 5, 2000. Interim exits were held on March 17, 2000, to discuss the results of a region-based corrective action program inspection and March 31, 2000, to discuss the results of a region-based emergency preparedness exercise inspection. The licensee acknowledged the findings presented. No information was examined during the inspection that was considered proprietary.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

W. Bargeron, Manager, Operations
R. Brown, Manager, Training and Emergency Preparedness
W. Burmeister, Manager, Engineering Support
G. Frederick, Plant Operations Assistant General Manager
J. Gasser, Nuclear Plant General Manager
K. Holmes, Manager, Maintenance
P. Rushton, Plant Support Assistant General Manager

INSPECTION PROCEDURES USED

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
IP 82301: Evaluation of Exercises for Power Reactors
IP 82302: Review of Exercise Objectives and Scenarios for Power Reactors
IP 92901: Followup - Operations
IP 92904: Followup - Plant Support

ITEMS OPENED AND CLOSED

ITEM NUMBER	TYPE	DESCRIPTION
Opened		
50-424/00-02-01	NCV	Failure to Promptly Identify and Correct Degraded Turbine Driven Auxiliary Feedwater Pump Flow Condition (Section O8.1)
Closed		
50-424/00-001	LER	Auxiliary Feedwater Pump Inoperable for Longer Than Allowed By Technical Specifications (Section O8.1)
50-424/00-02-01	NCV	Failure to Promptly Identify and Correct Degraded Turbine Driven Auxiliary Feedwater Pump Flow Condition (Section O8.1)
50-424,425/01011	VIO	Discrimination for Engaging in Protected Activities (Section S8.1)
50-424,425/02011	VIO	Discrimination for Engaging in Protected Activities (Section S8.1)

Attachment (3 pages):
2000 NRC Biennial Graded Exercise
Dtd. March 29, 2000