

April 24, 2001

Mr. Ron J. DeGregorio  
Vice President Oyster Creek  
AmerGen Energy Company, LLC  
P.O. Box 388  
Forked River, New Jersey 08731

SUBJECT: OYSTER CREEK GENERATING STATION- NRC INTEGRATED INSPECTION  
REPORT 05000219/2001-002

Dear Mr. DeGregorio:

On March 31, 2001, the NRC completed an integrated inspection at your Oyster Creek reactor facility. The enclosed report presents the results of that inspection. The results of this inspection were discussed on April 13, 2001, with Mr. Ernie Harkness and other members of your staff.

This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index/html> (the Public Electronic Reading Room).

Sincerely,

*/RA/*

John F. Rogge, Chief  
Projects Branch No. 7  
Division of Reactor Projects

Docket/License Nos.: 05000219/DPR-16

Enclosure: Inspection Report 05000219/2001-002

Attachment: Supplemental Information

Mr. Ron J. DeGregorio

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cc w/encl:

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**U. S. NUCLEAR REGULATORY COMMISSION**

**REGION I**

Report No. 05000219/2001-002

Docket No. 05000219

License No. DPR-16

Licensee: AmerGen Energy Company, LLC (AmerGen)

Facility: Oyster Creek Generating Station

Location: Forked River, New Jersey

Dates: February 11, 2001- March 31, 2001

Inspectors: Laura A. Dudes, Senior Resident Inspector  
Thomas R. Hipschman, Resident Inspector  
John R. McFadden, Health Physicist, February 12-16, 2001  
Neil S. Perry, Senior Project Engineer, March 12-16, 2001  
Jason C. Jang, Senior Health Physicist, March 19-22 and 26,  
2001

Approved By: John F. Rogge, Chief  
Projects Branch 7  
Division of Reactor Projects

## SUMMARY OF FINDINGS

IR 05000219-01-002, on 02/11-03/31/01, AmerGen, Oyster Creek Generating Station.

The inspection was conducted by resident and region based inspectors.

### A. Inspector Identified Findings

- No findings of significance were identified.

### B. Licensee Identified Violations

#### **Cornerstone: Occupational Radiation Safety**

- A violation of very low significance was identified by the licensee and were reviewed by the inspector. Corrective actions taken or planned by the licensee appear reasonable. This violation is listed in Section 4OA7 of this report.

## Report Details

### Summary of Plant Status:

Oyster Creek began the inspection period at full power and remained there for the duration of the inspection period.

### **1. REACTOR SAFETY Initiating Events, Mitigating Systems, Barrier Integrity (REACTOR-R)**

#### 1R04 Equipment Alignment

##### a. Inspection Scope

The inspector performed a partial walkdown of the A/B batteries to verify the electrical system was aligned properly to support operation of the isolation condenser. The inspector reviewed system operating procedure 340.1, "125 VDC Distribution Systems A&B," and attachments 1 and 2, "In-service Electrical Lineup," to confirm that it met all requirements for system alignment.

##### b. Findings

No findings of significance were identified.

#### 1R05 Fire Protection

##### .1 Fire Suppression Equipment Walkdowns

##### a. Inspection Scope

The inspectors conducted fire protection activities consisting of plant walkdowns, discussions with fire protection personnel, and reviews of procedure 333, "Plant Fire Protection System," and the Oyster Creek Fire Hazards Analysis Report to verify that the fire program was implemented in accordance with the license. Plant walkdowns included observations of combustible material control, fire detection and suppression equipment availability, and compensatory measures. The inspectors conducted fire protection inspections in the following areas due to the potential to impact mitigating systems:

- Fire Brigade Equipment and Portable Fire Extinguishers
- Lower Cable Spreading Room Deluge System
- 4160 Volt Switchgear Rooms A/B/C/D
- 480 Volt Switchgear Room
- "C" Battery Room
- "A" and "B" Battery Room

##### b. Findings

No findings of significance were identified.

1R06 Flood Protection Measuresa. Inspection Scope

The inspector performed a walkdown of the containment spray pump room and reviewed procedures and corrective action documents associated with the 1-6 sump located in that room. The inspector verified that the sump levels in the room would not impact containment spray operability. In addition, the inspector reviewed job order (JO) 549458 which replaced the limit switches on the sump valve and cleaned the stem improving the overall material condition of the sump isolation valve.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalificationa. Inspection Scope

The inspectors observed licensed operator simulator training on February 26, 2001, to verify that the Oyster Creek operator requalification program adequately evaluated how well operators have mastered the training objectives, including training on high-risk operator actions. In addition the inspectors observed the training critique to assess the licensee's effectiveness in evaluating and correcting any observed deficiencies.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementationa. Inspection Scope

The inspectors selected the following safety significant systems in a(1) status to verify that: (1) failed SSCs were properly characterized, (2) goals and performance criteria were appropriate, (3) corrective action plans were appropriate, and (4) performance was being effectively monitored:

- Control Room HVAC System Train B
- Feedwater regulating and bypass valves
- Feedwater System

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessment and Emergent Work Evaluation

.1 Core Spray System Header Differential Pressure Test and Calibration

a. Inspection Scope

The inspector reviewed surveillance procedure, 610.3.004, "Core Spray System Header Differential Pressure Test and Calibration," verified the implementation of the procedure, and reviewed the risk assessment of this maintenance activity with respect to 10 CFR 50.65(a)(4). The inspector also reviewed the outage risk analysis to assure that concurrent work would not negatively impact the overall safety of the facility.

b. Findings

No findings of significance were identified.

.2 Initiating Event Activities Associated with Contractor Aircraft

a. Inspection Scope

On February 20, 2001, the inspector observed a helicopter hovering above the 230 KV switchyard (substation). The helicopter was performing thermal imaging on the electrical lines and substation components as part of a routine maintenance activity. Because neither the control room nor the work management organization were aware of this activity, the potential increase in a loss of offsite power due to an aircraft accident had not been evaluated.

The inspector reviewed procedure 2000-ADM-3022.01, "Work Management and On-line Risk Management & Assessment." Sections 5.4.6, 5.5.2.1, 5.9.1.3 and Attachment 4 of the above referenced procedure, which indicates that high risk evolutions and plant transient initiators should be identified and any potential increase in risk should be evaluated. The licensee entered this issue into their corrective action process (CAP 2001-0258). The inspector reviewed the CAP and noted that the work management issues and lack of external risk assessment were not addressed in the corrective action response. The inspector discussed this issue with the licensee's risk analyst and verified that there was negligible increase in risk due to the substation activities concurrent with the station's equipment configuration on February 20, 2001.

b. Findings

No findings of significance were identified.



.3 Condenser Bay Back Washing Concurrent with Core Spray System Surveillance

a. Inspection Scope

The inspector reviewed the a(4) risk assessment for plant activities conducted on March 1, 2001. While core spray system I was out of service for a routine surveillance, a condenser backwash was performed. The inspector reviewed Procedure 2000-ADM-3022.01 "Work Management and On-line Risk Management & Assessment," and verified that the licensee was performing risk assessment in accordance with their procedures. The inspector discussed this issue with the licensee's risk analyst and verified that the overall plant status risk did not change due to the condenser backwash evolution.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed operability determinations associated with the following plant equipment challenges:

- C1 Battery Charger
- "as found" data for 2 relays during Grid Undervoltage surveillance

b. Findings

No findings of significance were identified.

1R16 Operator Work-Arounds

a. Inspection Scope

The inspector reviewed the operator work-around database and associated corrective action reports and work orders. In addition, the inspector observed control room and equipment operators to verify that potential operator work arounds were captured in the CAP.

b. Findings

No findings of significance were identified.

## 1R19 Post-Maintenance Testing

### a. Inspection Scope

The inspector reviewed and observed portions of the post maintenance testing associated with the following maintenance activities because of their function as mitigating systems and their potential role in increasing plant transient frequency. The inspectors reviewed the post maintenance test documents to verify that they were in accordance with the licensee's procedures and that the equipment was restored to an operable state.

- JO 00549232, Emergency Condenser V-14-01 vent valve
- JO 00549515, Control Rod Drive Pump Oil Cooler Pipe Repairs
- JO 00549486, Condenser 1-C Backwash Cross Over Valve

### b. Findings

No findings of significance were identified.

## 1R22 Surveillance Testing

### .1 Core Spray Pump Failure Pressure Switches Calibration

#### a. Inspection Scope

The inspector observed the implementation of procedure 610.3.001, "Core Spray Pump Failure Pressure Switches Calibration." The inspector used NRC Generic Letter 96-01, "Testing of Safety Related Logic Circuits," and licensee Technical Specification requirement 3.4.A to verify acceptability.

#### b. Findings

No findings of significance were identified.

### .2 Emergency Communication Systems

#### a. Inspection Scope

The inspector observed portions of and reviewed surveillance test procedure 658.4.003 "Emergency Communication Tests," to verify that the various communication systems were capable of performing their functions as required by technical specifications. The inspector reviewed the surveillance test results, interviewed personnel, and sampled the licensee's corrective action program for problems identified during past performance of this surveillance to determine the licensee's threshold for identifying and resolving problems.

b. Findings

No findings of significance were identified.

.3 Grid Undervoltage and Channel Functional Test

a. Inspection Scope

The inspector reviewed surveillance procedure 632.2.002, "Grid Undervoltage and Channel Functional Test." The inspector verified that all relays were capable of performing their safety function and all discrepancies were captured in the licensee's corrective action program.

b. Findings

No findings of significance were identified.

.4 Core Spray Isolation Valve Actuation Test and Calibration, 610.3.006

a. Inspection Scope

The inspector reviewed surveillance procedure 610.3.006, "Core Spray Isolation Valve Actuation Test and Calibration." The inspector verified that all surveillance prerequisites were met, observed field communications during the surveillance and reviewed the test data. The inspector verified the test equipment had the appropriate calibration and that the temporary jumper used to perform the surveillance was controlled in accordance with procedures.

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications

.1 TBCCW Continuous Venting

a. Inspection Scope

The inspector reviewed temporary modification document MJ 2000-51 and Safety Evaluation 000531-033, "Turbine Building Closed Loop Cooling Water (TBCCW) Heat Exchanger Eductor Venting Temporary Modification." The inspector verified that the temporary modification was performed in accordance with licensee procedure 108.8, "Temporary Modification Control," and reviewed the Oyster Creek Updated Final Safety Analysis Report (UFSAR), Section 9.2 to verify that the temporary modification did not adversely impact the system design features. Lastly, the inspector performed a walkdown of the installed temporary modification to assure the installed configuration reflected the design documents.

b. Findings

No findings of significance were identified.

.2 Feedwater Pressure Sensors

a. Inspection Scope

The inspector reviewed temporary modification document MJ 2001-005, "Temporary Modification to PS-RE0023C and PS-RE0023D." This temporary modification installed two high speed pressure transmitters in place of the existing transmitter to evaluate suspected pressure spikes on the RE23 sensing lines. These sensing lines provide input to the reactor protection system main steam line low pressure containment isolation logic. The inspector reviewed Oyster Creek UFSAR, Section 7.3, to verify that the temporary modification did not impact the safety function of these pressure switches. The inspector performed a walkdown of the temporary modification to verify the installed configuration was in accordance with the temporary modification document.

b. Findings

No findings of significance were identified.

**2. RADIATION SAFETY  
Occupational Radiation Safety (OS)**

2OS1 Access Control To Radiologically Significant Areas

a. Inspection Scope

The inspector toured the facilities and inspected procedures, procedural implementation, records, and other program documents to evaluate the effectiveness of the licensee's access controls to radiologically significant areas.

The inspector observed activities in the radiologically controlled area (RCA) to verify compliance with requirements for RCA entry and exit, wearing of record dosimetry, and issuance and use of electronic dosimeters, including the practices for determining and implementing the dose and dose rate alarm point settings. On two separate days, the inspector toured in the RCA, including the reactor, turbine, augmented off-gas, and new radioactive waste buildings. During these tours, the inspector reviewed the posting, labeling, barricading, and level of access control for locked high radiation areas (LHRAs), high radiation areas (HRAs), radiation and contamination areas, and radioactive material areas.

The inspector reviewed the following radiation work permits (RWPs) for the adequacy of radiological survey data, required radiological controls and personal protective equipment, and instructions to radiation workers.

- RWP # 542666, Revision 2, RadCon, Operations, Chemistry, Observation, Inspection, and Visitors
- RWP # 532110, Revision 3, 18R drywell recirculation pump cooler

replacement/repair and minor work on the “C” recirculation seal in the seal rebuild room on reactor building elevation 95'

- RWP # 538491, Revision 2, 18R trunnion room, replace main steam isolation valve stem/pilot poppet (open, inspect, and repair)
- RWP # 539264, Revision 0, 18R reactor building elevation 119', reactor vessel/fuel floor reassembly activities
- RWP # 539932, Revision 0, 18R drywell, control rod drive (CRD) area, exchange CRDs, replace CRD o-rings
- RWP # 540109, Revision 1, 18R drywell, outage in-service inspection and reactor coolant system intergranular stress corrosion cracking support
- RWP # 543643, Revision 0, 18R reactor building elevation 38', measure TIP friction/torque valves
- RWP # 544217, Revision 1, 18R drywell elevation 23', main steam isolation valve repairs (open, replace stem/pilot poppet assembly, repair, and reassemble valves)
- RWP # 544315, Revision 0, 18R reactor building elevation 119', refueling activities

The inspector also reviewed selected sections of the following procedures and documents to evaluate their adequacy and compliance with applicable regulations.

- 2000-ADM-7216.01, Revision 8, Corrective action process (CAP)
- 6630-ADM-4000.01, Revision 5, Administrative dose limits
- 6630-PLN-4010.01, Revision 0, Oyster Creek radiation protection plan
- 6630-ADM-4000.11, Revision 3, Rules of conduct of radiological work
- 6630-ADM-4110.01, Revision 5, Establishing and posting areas in the radiologically controlled area (RCA)
- 6630-ADM-4110.04, Revision 7, Radiological work process
- 6630-ADM-4110.06, Revision 16, Control of locked high radiation areas (LHRAs)
- 6630-ADM-4241.05, Revision 6, Dosimetry investigative reports
- Calculation No. 2820-99-002 Evaluation of the personnel contamination monitor (PCM1-B) and portal monitor (PM6A) for passive monitoring
- RADCON Statistics for 16R, 17R, and 18R
- Self-Assessment No. 2810-PA-00-003, Fixed contamination tool/scaffolding use, December 31, 2000
- Self-Assessment No. 2810-PA-00-004, Air sampling and analysis, November 21, 2000

- Self-Assessment No. 2810-PA-00-006, Contamination control, December 21, 2000
- Self-Assessment No. 2810-PA-00-007, Exit Point/SOP Observations, December 11, 2000

The inspection included a review of the following CAP items for the appropriateness and adequacy of event categorization, immediate corrective action, corrective action to prevent recurrence, and timeliness of corrective action: CAP Nos. O2000-1390, O2000-1484, O2000-1493, O2000-1517, O2000-1571, O2000-1800, O2000-1917, O2000-1944, O2001-0122, and O2001-0161.

The review was against criteria contained in 10 CFR 19.12, 10 CFR 20 (Subparts D, F, G, H, I, and J), site Technical Specifications, and site procedures.

b. Findings

No findings of significance were identified.

2OS2 ALARA Planning and Control

a. Inspection Scope

The inspector toured the facilities and inspected procedures, procedural implementation, records, and other program documents to determine the effectiveness of "As Low As Is Reasonably Achievable," (ALARA) planning and control. During the tours of the facilities described in the previous section, the inspector observed the use of signs to identify low dose waiting areas and to identify higher dose areas where access time should be minimized.

The inspector reviewed the following procedure and program documents.

- 6630-ADM-4010.02, Revision 10, Conduct of radiological engineering
- Rad Performance Committee Minutes for October 18, 2000
- 2001 Dose Goals by Department
- Actual and Estimated Dose for Major Evolutions, 10/14 to 11/16/00

The inspector reviewed the following post-job ALARA Reviews associated with Radiological Engineering Reviews (RERs) for the adequacy of identification of lessons to be learned.

- RER No. 2000-25A 18R drywell in-service inspection/intergranular stress corrosion cracking and feedwater/control rod drive return nozzle inspections
- RER No. 2000-38C 18R drywell "C" recirculation pump cooler replacement
- RER No. 2000-41A 18R drywell and trunnion room main steam isolation valve disassembly, inspection, and repair
- RER No. 2000-45E 18R refuel floor activities
- RER No. 2000-47A 18R drywell control rod drive (CRD) and CRD O-ring replacement

The licensee stated that the actual person-rem total for the outage year of 2000 was approximately 622 which would result in a three-year-rolling average of approximately 324 and that the person-rem goal for the year of 2001 was 45.

The review was against criteria contained in 10 CFR 20.1101, 10 CFR 20.1702, site Technical Specifications, and site procedures.

b. Findings

No findings of significance were identified.

2OS3 Radiation Monitoring Instrumentation

a. Inspection Scope

The inspection included the following activities to determine the accuracy and operability of radiation monitoring instruments that are used for the protection of occupational workers and to determine the adequacy of the program to provide self-contained breathing apparatus (SCBA) to occupational workers.

The inspector toured through the reactor, turbine, augmented off-gas, and new radioactive waste buildings in addition to the control room and verified the location and operability of selected installed area radiation monitors.

The inspector reviewed the calibration records for selected Geiger-Mueller tube area radiation monitors listed in Table 12.3-2 (update 11, 04/99) of the UFSAR. The reviewed records included those for the following installed radiation monitors.

Radiation Monitor <u>Tag No.</u>	<u>Location</u>
A-1	Entrance to the turbine building from elevation 23'6" (from administration building)
A-7	Turbine building feed pump area at elevation 3'6"
B-3	Old radwaste building pump room
C-1	Reactor building cleanup pump area at elevation 51'3"
C-4	Shutdown heat exchanger area at elevation 51'3"
C-8	Air ejector area in turbine building at elevation 0'0"
C-9	Reactor building fuel pool area at elevation 119'
C-10	Reactor building fuel pool area at elevation 119'3"

The inspector reviewed the calibration records for selected ion chamber area radiation monitors listed in Table 12.3-3 (update 5, 12/90) of the UFSAR. The reviewed records included those for the following installed radiation monitors.

Radiation Monitor	
<u>Tag No.</u>	<u>Location</u>
RM-3	Chemical filter area at elevation 48'
RM-6	Radwaste concentrator area at elevation 23'
RM-9	New radwaste building, East, at elevation 38'
RM-7	Spent resin tank at elevation 23'

The inspector toured the plant and observed the storage locations for emergency SCBA and spare bottles. The inspector also reviewed the most recent records for the periodic checks performed on this equipment. The inspector also witnessed a practical-factors-training session for the use of SCBA which included change-out of the breathing-air bottle. The inspector examined the following procedures and documents for adequacy of content and compliance with applicable regulations.

- 6630-ADM-4020.01, Revision 11, Respiratory protection program
- 6630-ADM-4020.03, Revision 12, Use of respiratory protection equipment
- 6632-OPS-4030.03, Revision 1, Inspection and maintenance of respiratory protection equipment
- Lesson Plan 6200-PGD-2699-300.0, Respiratory Protection, Initial/Experienced Worker, Revision 0

The review in this part (2OS3) was against criteria contained in Title 10 of the Code of Federal Regulations (CFR) Parts 20.1203 (Determination of external dose from airborne radioactive material), 20.1204 (Determination of internal exposure), Subpart F (Surveys and monitoring), Subpart H (Respiratory protection and controls to restrict internal exposures in restricted areas), and Subpart L (Records) and against criteria contained in site procedures (cited above in this section).

b. Findings

No findings of significance were identified.

## **Public Radiation Safety (PS)**

### 2PS2 Radioactive Material Processing and Transportation

a. Inspection Scope

The inspector reviewed the following documents to ensure that the licensee met the requirements specified in the licensee's program for the unrestricted release of material from the RCA:

- methods used for control, survey, and release of material from the RCA;
- most recent calibration results for radiation monitoring instrumentation (SAM), including the (a) alarm setting, (b) response to the alarm, and (c) the sensitivity;



- licensee's criteria for the survey and release of potentially contaminated material; and
- associated procedures and records to verify for the lower limits of detection.

The review was against criteria contained in 10 CFR 20, NRC Circular 81-07, NRC Information Notice 85-92, NUREG/CR-5569, Health Position Data Base (Positions 221 and 250), and the licensee's procedures.

b. Findings

No findings of significance were identified.

2PS3 Radiological Environmental Monitoring Program (REMP)

a. Inspection Scope

The inspector reviewed the following documents to evaluate the effectiveness of the licensee's Radiological Environmental Monitoring Program (REMP). The requirements of the REMP are specified in the Technical Specifications/Offsite Dose Calculation Manual (TS/ODCM).

- the 1999 Annual REMP Report, including two interlaboratory comparisons (DOE Environmental Measurements Laboratory and Analytics Laboratory), and the laboratory proficiency testing (Teledyne Brown Engineering Laboratory);
- the most recent Offsite Dose Calculation Manual (ODCM, Revision 13, March 16, 2001) and technical justifications for ODCM changes, including sampling locations;
- the most recent calibration results of the meteorological monitoring instruments for wind direction, wind speed, and temperature;
- trending analyses for meteorological parameters (wind speed and temperature);
- the 2000 calibration results for all REMP air samplers;
- the licensee's corrective actions of any deficiencies for the interlaboratory comparison;
- implementation of the environmental thermoluminescent dosimeters (TLDs) program;
- self-assessment and corrective actions (CAP Nos. 02000-0940 & 02000-0032);
- the 1999 QA audit (Audit Number S-OC-99-02) for the REMP/ODCM implementations;
- the Land Use Census procedure and the 2000 results; and
- associated REMP procedures.

The inspector also toured and observed the following activities to evaluate the effectiveness of the licensee's REMP.

- observation for air iodine and particulate sampling techniques; and
- walkdown for determining whether air samplers, underground wells, surface water sampling area, and TLDs (including indicators and controls) were located as described in the ODCM (including control and indicator stations) and for determining the equipment material condition.

b. Findings

No findings of significance were identified.

#### 4. OTHER ACTIVITIES (OA)

##### 4OA1 Performance Indicator Verification

###### .1 Occupation Exposure Control Effectiveness

###### a. Inspection Scope

The inspector selectively examined records used by the licensee to identify occurrences involving HRAs, very high radiation areas, and unplanned personnel exposures for the period from December of 2000 to the time of this inspection against the applicable criteria specified in Nuclear Energy Institute (NEI) 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 0, to verify that all conditions that met the NEI criteria were recognized and identified as Performance Indicators. The reviewed records/activities included corrective action program records (CAP items) and reviews of daily individual and RWP exposures. The inspector also examined a document which was entitled "NRC performance indicator process and preparation guideline." This inspection, in conjunction with the reviews of CAP items documented in previous inspection reports (Report Nos. 05000219/2000-006, -008, and -09), did not find any problems with the PI accuracy or completeness and thus verified this performance indicator.

###### b. Findings

No findings of significance were identified.

###### .2 RETS/ODCM Radiological Effluent Occurrences

###### a. Inspection Scope

The inspector reviewed the following documents to ensure the licensee met all requirements of the performance indicator from the first quarter 1999 to the fourth quarter 2000 (8 quarters):

- monthly projected dose assessment results due to radioactive liquid and gaseous effluent releases;
- quarterly projected dose assessment results due to radioactive liquid and gaseous effluent releases; and
- associated procedures, including projected dose calculation methodology.

b. Findings

No findings of significance were identified.

4OA6 Meetings, including ExitExit Meeting Summary

On April 13, 2001, the resident inspectors presented the inspection results to Mr. Ernie Harkness and other members of licensee management. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

4OA7 Licensee Identified Violations

The following findings of very low significance were identified by the licensee and are violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a Non-Cited Violation (NCV).

NCV Tracking NumberRequirement Licensee Failed to Meet

(1) NCV 05000219/2001-002-01

Technical Specification 6.11 requires that procedures shall be prepared consistent with 10 CFR Part 20 and shall be adhered to for all operations involving personnel radiation exposure. Radiological Engineering Procedure 6630-ADM-4110.04, Revision 7, Radiological Work Process, requires that each individual entering a Radiological Work Permit (RWP) area be responsible for complying with the RWP. Contrary to the above, on November 16, 2000, instrumentation and control technicians were found to be performing equipment tests on the traversing in-core probe system without notifying the health physics department prior to resumption of work in violation of RWP 543643. Reference CAP No. O2000-1917

**ATTACHMENT 1****SUPPLEMENTAL INFORMATION**a. Key Points of ContactLicensee (in alphabetical order)

V. Aggarwal, Director, Engineering  
 D. McMillian, Manager, Experience Assessment  
 G. Campesi, Technical Training  
 E. Cartwright, Director, Work Management  
 W. Collier, Radwaste Shipping  
 R. DeGregorio, Vice President  
 B. DeMerchant, Licensing Engineer  
 R. Fenti, Quality Assurance Auditor  
 E. Harkness, Plant Manager  
 R. Hillman, Manager, Chemistry & Radwaste  
 E. Johnson, System Engineer, Installed Radiation Monitors  
 A. Judson, Radiological Engineer  
 D. Larson, Emergency Planners  
 J. Magee, Director, Maintenance  
 M. Moore, Radiation Protection  
 K. Mulligan, Director, Training  
 J. Murphy, Radiological Engineer  
 J. Renda, Radiation Protection Supervisor  
 P. Sawyer, Radiological Engineering Manager  
 G. Seals, Radiological Engineer  
 D. Slear, Senior Manager, Design  
 C. Wilson, Senior Manager, Operations  
 K. Zadroga, Radiation Protection Supervisor

b. List of Items Opened, Closed, and DiscussedOpened and Closed

05000219/2001-002-01	NCV	Violation of Technical Specification 6.11, instrumentation and control technicians were found to be performing equipment tests on the traversing in-core probe system without notifying the health physics department prior to resumption of work in violation of RWP 543643. Reference CAP No. O2000-1917
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c. List of Acronyms

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As Is Reasonably Achievable
AmerGen	AmerGen Energy Company, LLC
CAP	Corrective Action Process
CDF	Core Damage Frequency
CRD	Control Rod Drive
CFR	Code of Federal Regulations
DOE	Department of Energy
HRA	High Radiation Area
HVAC	Heating, Ventilation and Air Conditioning
JO	Job Order
LHRA	Locked High Radiation Area
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
PI	Performance Indicator
RCA	Radiologically Controlled Area
REMP	Radiological Environmental Monitoring Program
RERs	Radiological Engineering Reviews
RETS	Radiological Effluent Technical Specification
RWP	Radiation Work Permit
SAM	Small Articles Monitor
SCBA	Self-Contained Breathing Apparatus
SSCs	Structures, Systems and Components
TBCCW	Turbine Building Closed Loop Cooling Water
TLD	Thermoluminescent Dosimeter
TS	Technical Specification
UFSAR	Updated Final Safety Analysis Report
Vdc	Volts, direct current