

June 12, 2001

Mr. Oliver D. Kingsley, President
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BYRON STATION, UNITS 1 AND 2
NRC INSPECTION REPORT 50-454/01-08(DRP); 50-455/01-08(DRP)

Dear Mr. Kingsley:

On May 14, 2001, the NRC completed an inspection at the Byron Station, Units 1 and 2. The enclosed report documents the inspection findings which were discussed on May 10, 2001, with Mr. R. Lopriore and other members of your staff.

The 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.

Based on the results of this inspection, 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).

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

Sincerely,

/RA/

Ann Marie Stone, Chief
Branch 3
Division of Reactor Projects

Docket Nos. 50-454; 50-455
License Nos. NPF-37; NPF-66

Enclosure: Inspection Report 50-454/01-08(DRP);
50-455/01-08(DRP)

See Attached Distribution

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R. Helfrich, Senior Counsel, Nuclear
DCD - Licensing
R. Lopriore, Site Vice President
S. Kuczynski, Station Manager
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-454; 50-455
License Nos: NPF-37; NPF-66

Report No: 50-454/01-08(DRP); 50-455/01-08(DRP)

Licensee: Exelon Generation Company, LLC

Facility: Byron Station, Units 1 and 2

Location: 4450 N. German Church Road
Byron, IL 61010

Dates: April 1 through May 14, 2001

Inspectors: E. Cobey, Senior Resident Inspector
B. Kemker, Resident Inspector
C. Phillips, Braidwood Senior Resident Inspector
T. Tongue, Project Engineer
W. Slawinski, Senior Radiation Specialist
R. Alexander, Radiation Specialist
C. Thompson, Illinois Department of Nuclear Safety

Approved by: Ann Marie Stone, Chief
Branch 3
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000454-01-08(DRP), IR 05000455-01-08(DRP), on 04/01-05/14/2001; Exelon Generation Company, LLC; Byron Generating Station; Units 1 & 2. Resident Inspector Report, Radiation Specialist Report.

The baseline inspections were conducted by resident inspectors, radiation specialists, and a regional project engineer. No findings of significance were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609 "Significance Determination Process" (SDP). The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process web site at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>. Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violation.

A. Inspector Identified Findings

No findings of significance were identified in any of the cornerstones.

B. Licensee Identified Violations

Violations of very low significance which were identified by the licensee have been reviewed by the inspector. Corrective actions taken or planned by the licensee appear reasonable. These violations are listed in Section 4OA7 of this report.

Report Details

Summary of Plant Status

The licensee operated Unit 1 at or near full power until April 24, 2001, when the licensee reduced power to approximately 30 percent of rated thermal power to perform an emergent repair to a steam generator main feedwater system isolation valve. Following repair to the valve, the licensee returned Unit 1 to full power on April 25, 2001. The unit was operated at or near full power for the remainder of the inspection period.

Unit 2 was operated at or near full power until April 7, 2001, when the licensee conducted a reactor shutdown for refueling outage B2R09. Following completion of the refueling outage, the unit was synchronized to the grid on April 22, 2001. The unit was operated at or near full power for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R04 Equipment Alignment (71111.04)

a. Inspection Scope

The inspectors verified the system alignment of the equipment listed below during maintenance activities affecting the availability of associated redundant equipment:

- 2A Diesel Generator (DG)
- Unit 2 System Auxiliary Transformer (SAT) 242-2, and
- 2A Auxiliary Feedwater (AF) System Train.

The systems were selected because they were identified as risk significant in the licensee's risk analysis. The inspectors performed walkdowns of the accessible portions of the systems and verified the system lineup and each of the system operating parameters (i.e., temperature, pressure, flow). During the Unit 2 SAT outage that removed SAT 242-1 from service for maintenance, the inspectors verified the alignment of the 2A AF system train because the loss of this equipment would result in a significant increase to the unit's on-line risk status. During the 2A DG alignment activity and Unit 2 SAT outage, the inspectors also verified the alignment of the normal and reserve offsite power sources.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors examined the plant areas listed below to observe conditions related to fire protection:

- Unit 2 Containment Building
- 2A DG Room (Zone 9.2-2)
- 2A DG Day Tank Room (Zone 9.3-2)
- 2B DG Room (Zone 9.1-2)
- 2B DG Day Tank Room (Zone 9.4-2)

These areas were selected for inspection because risk significant systems, structures, and components were located in the areas. The inspectors reviewed applicable portions of the Byron Station Fire Protection Report and assessed the licensee's control of transient combustibles and ignition sources, material condition, and operational status of fire barriers and fire protection equipment.

In addition, the inspectors reviewed the issues that the licensee entered into its corrective action program to verify that identified problems were being entered into the program with the appropriate characterization and significance. The inspectors also reviewed the licensee's corrective actions for fire protection issues documented in selected condition reports.

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance (71111.07)

a. Inspection Scope

The inspectors observed the licensee perform inspections of the following heat exchangers on the diesel driven 2A AF pump:

- 2AF01AB 2B AF Pump Lube Oil Cooler
- 2AF02A 2B AF Pump Gearbox Oil Cooler
- 2SX01K 2B AF Pump Engine Closed Cycle Heat Exchanger
- 2SX02K 2B AF Pump Right Angle Gear Oil Cooler

The inspectors selected these heat exchangers to inspect because the AF system was identified as risk significant in the licensee's risk assessment and the heat exchangers were required to support operability of the pump. During this inspection, the inspectors observed the as-found condition of the coolers and verified that no deficiencies existed that would mask degraded performance. In addition, the inspectors observed that no conditions were present that would indicate a potential for common cause problems. The inspectors discussed the as-found condition as well as the historical performance of

these coolers with engineering department personnel and reviewed applicable documents and procedures.

In addition, the inspectors reviewed the issues that the licensee entered into its corrective action program to verify that identified problems were being entered into the program with the appropriate characterization and significance. The inspectors also reviewed the licensee's corrective actions for heat sink performance issues documented in selected condition reports.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors evaluated the licensee's implementation of the maintenance rule, 10 CFR 50.65, as it pertained to identified performance problems with the following equipment:

- Reactor Containment Fan Coolers.

During this inspection, the inspectors evaluated the licensee's monitoring and trending of performance data, verified that performance criteria were established commensurate with safety, and verified that the equipment failures were appropriately evaluated in accordance with the maintenance rule. The inspectors interviewed system engineers and the station's maintenance rule coordinator.

In addition, the inspectors reviewed the issues that the licensee entered into its corrective action program to verify that identified problems were being entered into the program with the appropriate characterization and significance. The inspectors also reviewed the licensee's corrective actions for maintenance rule issues documented in selected condition reports.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk for planned maintenance activities on the following equipment:

- 0A Essential Service Water (SX) System Makeup Pump,
- 2SX 194 (Auxiliary Feedwater to SX System Recirculation Check Valve), and
- Unit 2 System Auxiliary Transformer 242-1.

The inspectors selected these maintenance activities because they involved systems which were risk significant in the licensee's risk analysis. During this inspection, the inspectors assessed the operability of redundant train equipment and verified that the licensee's planning of the maintenance activities minimized the length of time that the plant was subject to increased risk. The inspectors also interviewed operations, engineering and work control department personnel.

In addition, the inspectors reviewed the issues that the licensee entered into its corrective action program to verify that identified problems were being entered into the program with the appropriate characterization and significance. The inspectors also reviewed the licensee's corrective actions for maintenance risk related issues documented in selected condition reports.

b. Findings

No findings of significance were identified.

1R14 Personnel Performance During Non-routine Plant Evolutions (71111.14)

.1 Unit 2 Shutdown for Refueling Outage B2R09

a. Inspection Scope

The inspectors observed the heightened level of awareness briefing for the Unit 2 reactor shutdown for refueling outage B2R09, interviewed operations and engineering department personnel, and observed selected portions of the shutdown evolution. This non-routine plant evolution was selected for observation to evaluate the performance of operators and qualified nuclear engineers.

b. Findings

No findings of significance were identified.

.2 Unit 2 Startup Following Refueling Outage B2R09

a. Inspection Scope

On April 22, 2001, the inspectors observed the startup of Unit 2 following refueling outage B2R09. This non-routine plant evolution was selected for observation to evaluate the performance of operators and qualified nuclear engineers. The inspectors interviewed operations and engineering department personnel, attended the pre-startup briefing, and reviewed plant startup procedures.

b. Findings

No findings of significance were identified.

.3 Problem Identification and Resolution of Selected Human Performance Issues

a. Inspection Scope

The inspectors reviewed the issues that the licensee entered into its corrective action program to verify that identified problems were being entered into the program with the appropriate characterization and significance. The inspectors also reviewed the licensee's corrective actions for human performance issues documented in selected condition reports.

b. Findings

No findings of significance were identified.

1R19 Post Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors evaluated the licensee's post maintenance testing activities for maintenance conducted on the following equipment:

- 0A SX System Makeup Pump,
- 2B SX System Pump, and
- 1FW009D ("D" Steam Generator Main Feedwater System Isolation Valve).

The inspectors selected these post maintenance activities because they involved systems which were risk significant in the licensee's risk analysis.

The inspectors reviewed the scope of the work performed and evaluated the adequacy of the specified post maintenance testing. The inspectors verified that the post maintenance tests were performed in accordance with approved procedures, that the procedures clearly stated acceptance criteria, and that the acceptance criteria were met. During these inspection activities, the inspectors interviewed operations, maintenance, and engineering department personnel and reviewed the completed post maintenance testing documentation.

b. Findings

No findings of significance were identified.

1R20 Refueling and Outage Activities (71111.20)

a. Inspection Scope

The inspectors evaluated the licensee's conduct of B2R09 refueling outage activities to assess the licensee's control of plant configuration and management of shutdown risk. The inspectors reviewed configuration management to verify that the licensee maintained defense-in-depth commensurate with the shutdown risk plan; reviewed major outage work activities to ensure that correct system lineups were maintained for key mitigating systems; and observed refueling activities to verify that fuel handling operations were performed in accordance with the Technical Specifications (TS) and approved procedures. Other major outage activities evaluated included:

- the licensee's control of containment penetrations in accordance with the TS;
- the licensee's control of systems, structures, and components (SSCs) which could cause unexpected reactivity changes;
- the licensee's control of flow paths, configurations, and alternate means for reactor coolant system (RCS) inventory addition and control of SSCs which could cause a loss of inventory;
- the licensee's control of RCS pressure, level, and temperature instrumentation;
- the licensee's control of spent fuel pool cooling during and after core offload;
- the licensee's control of switchyard activities and the configuration of electrical power systems in accordance with the TS and shutdown risk plan; and
- the licensee's control of SSCs required for decay heat removal.

The inspectors observed portions of the plant cooldown, including the transition to shutdown cooling, to verify that the licensee controlled the plant cooldown in accordance with the TS. In addition, the inspectors evaluated portions of the restart activities to verify that requirements of the TS and administrative procedure requirements were met prior to changing operational modes or plant configurations. Major restart inspection activities performed included:

- verification that RCS boundary leakage requirements were met prior to entry into mode 4 (cold shutdown) and subsequent operational mode changes;
- verification that containment integrity was established prior to entry into mode 4;
- inspection of the containment building to assess material condition and search for loose debris, which if present could be transported to the containment recirculation sumps and cause restriction of flow to the emergency core cooling system (ECCS) pump suctions during loss-of-coolant accident conditions;
- verification that the material condition of the containment building ECCS recirculation sumps met the requirements of the TS and was consistent with the design basis; and
- observation and review of reactor physics testing to verify that core operating limit parameters were consistent with the core design so that the fuel cladding barrier would not be challenged.

The inspectors interviewed operations, engineering, work control, radiological protection, and maintenance department personnel and reviewed selected procedures and documents.

In addition, the inspectors reviewed the issues that the licensee entered into its corrective action program to verify that identified problems were being entered into the program with the appropriate characterization and significance. The inspectors also reviewed the licensee's corrective actions for refueling outage issues documented in selected condition reports.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors evaluated the surveillance testing activities listed below to verify that the testing demonstrated that the equipment was capable of performing its intended function:

- Local Leakage Rate Testing of Safety Injection System Piping Penetration P-55,
- 2A Diesel Generator 18 Month Surveillance Testing, and
- Simultaneous Start of Both Auxiliary Feedwater Pumps with Flow to the Steam Generators.

The inspectors selected these surveillance test activities because the system functions were identified as risk significant in the licensee's risk assessment and the components were credited as operable in the licensee's safety analysis to mitigate the consequences of a potential accident. The inspectors interviewed operations, maintenance, and engineering department personnel, reviewed the completed test documentation, and observed the performance of all or portions of these surveillance testing activities.

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed the temporary modification listed below to verify that the installation was consistent with design modification documents and that the modification did not adversely impact system operability or availability:

- Design Change Procedure (DCP) 9901021 Remove Cable From Pre-amplifier Circuit for 2NR13EB (Post Accident Neutron Monitoring System) Due to Potential Moisture Build-up Within Cable.

The temporary modification removed one of the two detector inputs from the instrument's wide range amplifier circuit because moisture build-up in a cable created noise in the circuit. The inspectors verified that configuration control of the modification was correct by reviewing design modification documents and confirmed that appropriate post-installation testing was accomplished. The inspectors reviewed the design modification documents and the 10 CFR 50.59 evaluation against the applicable portions of the Updated Final Safety Analysis Report.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control to Radiologically Significant Areas (71121.01)

.1 Plant Walkdowns, Radiological Boundary Verification, and Radiation Work Permit (RWP) Reviews

a. Inspection Scope

The inspectors reviewed the station's implementation of physical and administrative controls over access to radiologically controlled areas (RCAs), including worker adherence to these controls, by reviewing station procedures, RWPs, and walking down radiologically significant areas (high radiation areas (HRAs), radiation areas, and airborne radioactivity areas) of the station. Specifically, areas in Unit 2 containment, the Unit 2 Reactor Cavity In-Core area, the Unit 2 Containment Access Facility, the Auxiliary Building, and the Radwaste facility were observed and some confirmatory radiation measurements were performed by the inspectors to verify that these areas were posted and controlled in accordance with 10 CFR Part 20, licensee procedures, and Technical Specifications.

b. Findings

No findings of significance were identified.

.2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed self-assessments, Nuclear Oversight audits and field observations, and licensee condition reports completed in recent months which focused on access control to radiologically significant areas. The inspectors reviewed these documents to assess the licensee's ability to identify repetitive problems, contributing causes, the extent of conditions, and implement corrective actions to achieve lasting results.

b. Findings

No findings of significance were identified.

2OS2 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls (71121.02)

.1 Radiological Work/ALARA Planning

a. Inspection Scope

The inspectors reviewed the station's procedures for radiological work/ALARA planning and scheduling, and evaluated the dose projection methodologies and practices implemented for the B2R09 Refueling Outage, to verify that sound technical bases for outage dose estimates existed. Specifically, the inspectors reviewed ten radiologically significant RWP/ALARA planning packages to verify that adequate man-hour estimates, job history files, lessons learned, and industry experiences were utilized in the ALARA planning process. The RWP/ALARA planning packages and the Outage Control Center scheduling system were also reviewed to assess the integration of ALARA principles into work procedures and scheduling of radiologically significant evolutions. In addition, via discussions with the Radiation Protection (RP) staff, the inspectors assessed the licensee's coordination with on-site subject matter experts (from the maintenance departments, engineering, chemistry, and operations) and the Station ALARA Committee in refining the ALARA plans.

b. Findings

No findings of significance were identified.

.2 Job Site Inspections and ALARA Controls

a. Inspection Scope

The inspectors observed work activities in the RCA that were performed in radiation areas or HRAs to evaluate the use of ALARA controls. Specifically, the inspectors reviewed radiological surveys, attended pre-job radiological briefings, and assessed job site ALARA controls, in part, for the following work activities:

- Replacement of the N44 power range detector in the reactor cavity in-core area;
- Reactor cavity decontamination activities;
- Scaffolding staging, building, and removal;
- Reactor coolant pump inspection, maintenance, and repair; and
- Reactor head reassembly.

Worker instruction requirements including protective clothing, engineering controls to minimize contamination, the use of predetermined low dose waiting areas, as well as the on-the-job supervision by the work crew leaders and RP technicians were observed to determine if the licensee had maintained the radiological exposure for these jobs ALARA. Additionally, the inspectors reviewed RP technician and staff evaluations for three personnel contamination events that occurred during B2R09, to verify technical adequacy and compliance with licensee procedures.

b. Findings

No findings of significance were identified.

.3 Radiation Worker Performance

a. Inspection Scope

The inspectors observed radiation workers performing the activities described in Section 2OS2.2 and evaluated their awareness of radiological conditions, personal electronic dosimetry alarm set points, and their implementation of applicable radiological controls.

b. Findings

No findings of significance were identified.

.4 Source Term Reduction and Control

a. Inspection Scope

The inspectors reviewed the status of the station's source term reduction program focusing on those initiatives with the potential to impact outage dose exposures (hot spot tracking, hydrolasing and flushing, temporary and permanent shielding, and on-line and shutdown chemistry controls). The inspectors also assessed the general trend of

the station's total source term to evaluate the effectiveness of the station's source term reduction plan.

b. Findings

No findings of significance were identified.

.5 Verification of Exposure Estimates, Dose Trending, and Exposure Tracking Systems

a. Inspection Scope

The inspectors reviewed the licensee's total outage dose goals, selected individual job dose goals, and the related dose trending for the B2R09 refueling outage. The licensee established an estimate of 74.81 person-rem for the Unit 2 outage. As of April 18, 2001, (day 12 of an approximately 16 day outage), the licensee had recorded an outage exposure of 44.98 person-rem compared to the total estimate of 69.38 person-rem. Selected Work-in-Progress reviews were examined to evaluate the licensee's ability to assess the effectiveness of the ALARA plans in a timely manner and institute changes in the plan or its execution, if warranted. The licensee's exposure tracking system was also reviewed to determine if the level of exposure tracking detail, exposure report timeliness, and report distribution were sufficient to support the control of collective exposure. Additionally, the inspectors reviewed dose tracking records for all workers on selected RWPs to assess the licensee's exposure tracking system and the effectiveness of licensee controls for maintaining individual exposures ALARA and relatively uniform across the workgroup.

b. Findings

No findings of significance were identified.

.6 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed Nuclear Oversight audits and field observations and licensee condition reports completed in recent months which focused on ALARA planning and controls. The inspectors reviewed these documents to assess the licensee's ability to identify repetitive problems, contributing causes, the extent of conditions, and develop corrective actions which will achieve lasting results.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA3 Event Follow-up (71153)

(Closed) Licensee Event Report (LER) 50-454-00-003-01: “Unintentional Violation of Low Temperature Over Pressure Protection System Technical Specification Due to Operator Error,” Supplement 1. The inspectors reviewed the original LER and issued Non-Cited Violation 50-454-00-19-01 for the licensee’s failure to maintain a low temperature over pressure protection system operable as required by Technical Specification 3.4.12. The licensee submitted Supplement 1 to LER 50-454-00-003 to revise the root cause investigation and risk assessment for the event. The inspectors determined that the information provided in Supplement 1 to LER 50-454-003 did not raise any new issues or change the conclusions of the initial review, which were documented in NRC Inspection Report 50-454/455-00-19(DRP). This LER is closed.

4OA6 Meetings

Exit Meeting

The inspectors presented the inspection results to Mr. R. Lopriore and other members of licensee management at the conclusion of the inspection on May 10, 2001. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. Proprietary information was reviewed during this inspection; however, the material is not discussed in this report.

The results of the Occupational Radiation Safety inspection were presented to Mr. R. Lopriore and other members of licensee management at the conclusion of the inspection on April 20, 2001. 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 finding of very low safety significance was identified by the licensee and is a violation of NRC requirements which meets the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a Non-Cited Violation (NCV).

If the licensee contests the NCV, the licensee should provide a response within 30 days of the date of this inspection report, with the basis for the denial, to the U.S. Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington, D.C. 20555-0001, with copies to the Regional Administrator, Region III; Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the Byron Generating Station.

NCV Tracking Number

Requirement Licensee Failed to Meet

NCV 50-455-01-08-01

10 CFR 50, Appendix B, Criteria V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. On April 16, 2001, a crew of three contract workers disassembled a feedwater system tempering line check valve from the wrong train, contrary to the work instructions. The licensee entered this occurrence into its corrective action program as CR B2001-01745.

KEY POINTS OF CONTACT

Licensee

B. Adams, Systems Engineering Manager
B. Altman, Maintenance Manager
R. Blaine, Radiation Protection Manager
D. Drawbaugh, Regulatory Assurance
S. Gackstetter, Shift Operations Superintendent
N. Gordon, Unit 2 Chemist
D. Hoots, Operations Manager
J. Kramer, Work Control Manager
J. Kuczynski, Radiation Protection Technical Support Superintendent
S. Kuczynski, Station Manager
R. Lopriore, Site Vice President
R. Munson, ALARA Analyst
P. Reister, Regulatory Assurance Manager
R. Roton, Regulatory Assurance
J. Sambito, Radiation Protection Field Supervisor
T. Schuster, Chemistry Manager
D. Wozniak, Engineering Manager

Contractor (Numanco)

C. Fuller, ALARA Analyst

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

| | | |
|------------------|-----|--|
| 50-454-00-003-01 | LER | Unintentional violation of low temperature over pressure protection system Technical Specification due to operator error |
|------------------|-----|--|

Discussed

| | | |
|-----------------|-----|---|
| 50-454-00-19-01 | NCV | Failure to maintain low temperature over pressure protection system Technical Specification due to human performance errors |
|-----------------|-----|---|

LIST OF ACRONYMS USED

| | |
|-------|--|
| AC | Alternating Current |
| ADRC | Advanced Digital Reactivity Computer |
| AF | Auxiliary Feedwater |
| ALARA | As-Low-As-Is-Reasonably-Achievable |
| ANSI | American National Standards Institute |
| ASME | American Society of Mechanical Engineers |
| BAP | Byron Administrative Procedure |
| BGP | Byron General Operating Procedure |
| BOP | Byron Operating Procedure |
| BOSR | Byron Operating Surveillance Requirement Procedure |
| BVSR | Byron Technical Surveillance Requirement Procedure |
| CFR | Code of Federal Regulations |
| CR | Condition Report |
| DCP | Design Change Procedure |
| DG | Diesel Generator |
| DRP | Division of Reactor Projects |
| ECCS | Emergency Core Cooling System |
| GL | Generic Letter |
| HRA | High Radiation Area |
| LCOAR | Limiting Condition for Operation Action Requirement |
| LER | Licensee Event Report |
| NCV | Non-Cited Violation |
| NRC | Nuclear Regulatory Commission |
| NSP | Nuclear Station Procedure |
| OOS | Out-of-Service |
| PANM | Post Accident Neutron Monitor |
| PARS | Publically Available Records |
| RCA | Radiologically Controlled Area |
| RCFC | Reactor Containment Fan Cooler |
| RCS | Reactor Coolant System |
| RH | Residual Heat Removal |
| RP | Radiation Protection |
| RWP | Radiation Work Permit |
| SAT | System Auxiliary Transformer |
| SDP | Significance Determination Process |
| SFP | Spent Fuel Pool |
| SHIP | System Health Indicator Program |
| SPP | Special Process Procedure |
| SSC | Systems, Structures, and Components |
| SX | Essential Service Water |
| TLCO | Technical Requirements Manual Limiting Condition for Operation |
| TMOD | Temporary Modification |
| TS | Technical Specification |
| WIP | Work-in-Progress Reviews |
| WR | Work Request |

LIST OF DOCUMENTS REVIEWED

1R04 Equipment Alignment

| | | |
|--|--|-------------|
| | Byron Station Technical Specifications | |
| | Byron/Braidwood Stations Updated Final Safety Analysis Report | |
| Byron Administrative Procedure (BAP) 340-2 | Initiation and Use of System Lineups (Mechanical and Electrical), | Revision 11 |
| Byron Operating Procedure (BOP) AF-E2 | Unit 2 Auxiliary Feedwater System Electrical Lineup | Revision 4 |
| BOP AF-E2A, | Unit 2 Auxiliary Feedwater System Train 'A' Electrical Lineup | Revision 1 |
| BOP AF-M2 | Unit 2 Auxiliary Feedwater System Valve Lineup | Revision 8 |
| BOP AF-M2A | Unit 2 Auxiliary Feedwater System Train 'A' Valve Lineup | Revision 8 |
| BOP AF-M2C | Unit 2 Auxiliary Feedwater System Train 'C' Valve Lineup | Revision 1 |
| BOP AP-86 | Isolating SAT 242-2 at Power | Revision 5 |
| BOP DG-1 | Diesel Generator Alignment to Standby Condition, | Revision 8 |
| BOP DG-E2A | Train 'A' Diesel Generator System Electrical Lineup | Revision 2 |
| BOP DG-M2A | Train 'A' Diesel Generator System Valve Lineup | Revision 6 |
| Unit 1 Byron Operating Surveillance Requirement Procedure (BOSR) 8.1.1-1 | Normal and Reserve Offsite AC [Alternating Current] Power Availability Weekly Surveillance | Revision 3 |
| 2BOSR 8.1.1-1 | Normal and Reserve Offsite AC Power Availability Weekly Surveillance | Revision 3 |

Condition Reports Written for Inspector Identified Issues

| | | |
|--------------------------------------|---|----------------|
| B2001-02198 | Valve Lineup Discrepancy | |
| <u>1R05</u> | <u>Fire Protection</u> | |
| | Byron/Braidwood Stations Fire Protection Report | |
| | Byron Administrative Procedure 1100-16, Administrative Controls for Required Fire/Flood Watch Inspections | Revision 6 |
| Condition Report (CR) B2001-01875 | Hourly Fire Watch Not Properly Documented and Plant Barrier Impairment Not Closed in Prompt Fashion | April 21, 2001 |
| CR# B2001-01965 | No Hourly Fire Watch in Place as Required by LCOAR [Limiting Condition for Operation Action Requirement] for Detection Zone | April 27, 2001 |

Condition Reports Written for Inspector Identified Issues

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|-----------------|--|--------------|
| CR# B2001-02160 | Oil and Oil Absorbent Under Unit 2 Diesel Generators | May 10, 2001 |
|-----------------|--|--------------|

1R07 Heat Sink Performance

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|-----------------------------------|--|--------------------|
| Byron Technical Procedure 800-30 | Service Water System Fouling Monitoring Program | Revision 4 |
| Work Request (WR) 990157857-01 | 2SX02K - Heat Exchanger Inspection Per GL [Generic Letter] 89-13, 2B AF Pump Right Angle Gear Oil Cooler | Revision 0 |
| WR 990157858-01 | 2SX01K - Heat Exchanger Inspection Per GL 89-13, 2B AF Pump Engine Closed Cycle Heat Exchanger | Revision 0 |
| WR 990217899-01 | 2AF02A - Heat Exchanger Inspection Per GL 89-13, 2B AF Pump Gearbox Oil Cooler | Revision 0 |
| WR 990217900-01 | 2AF01AB - Heat Exchanger Inspection Per GL 89-13, 2B AF Pump Lube Oil Cooler | Revision 0 |
| CR# B2000-02836 | Essential Service Water Pipe and 1B Auxiliary Feedwater Cubicle Cooler Flange Connections Are Corroded | September 30, 2000 |
| CR# B2001-00487 | Generic Letter 89-17 Trending Database Not Current | February 1, 2001 |

Condition Reports Written for Inspector Identified Issues

CR# B2001-02149 Discrepancies in GL 89-13 Reports From May 9, 2001
B2R08

1R12 Maintenance Rule Implementation

| | | |
|--------------------------------------|--|--|
| Nuclear Station Procedure ER-3010 | Maintenance Rule | Revision 0 |
| | Maintenance Rule Performance Monitoring Data for Criteria VP-2, Containment Air Recirculation and Cooling | March 1, 1999 through April 2, 2001 |
| CR# B1999-00992 | 1D RCFC [Reactor Containment Fan Cooler] Low Speed Breaker Cell Switch Failure | March 22, 1999 |
| CR# B1999-01021 | 1D RCFC Heat Exchanger Effectiveness Surveillance Failure | March 23, 1999 |
| CR# B1999-01217 | 21A Drain Cooler Tube Leak | April 3, 1999 |
| CR# B1999-02144 | Failure of 1C RCFC to Start in Low Speed | June 3, 1999 |
| CR# B1999-02567 | 21B Drain Cooler Tube Leak | July 15, 1999 |
| CR# B2000-01781 | Maintenance Rule Monitoring Concerns With Ventilation Supply to Motor Driven Auxiliary Feedwater Pumps | June 23, 2000 |
| CR# B2000-01866 | 11A Drain Cooler Tube Leak | July 4, 2000 |
| CR# B2000-02094 | Apparent Trend in the Number of Unplanned Limiting Condition for Operation Action Requirement Entries Due to Equipment Related Problems | July 26, 2000 |
| CR# B2000-03435 | Primary Containment System Degrades to Red System SHIP [System Health Indicator Program] Status | November 13, 2000 |
| CR# B2000-03832 | 2B Containment Chiller Tripped Inadvertently Due to Low Essential Service Water Temperature | December 17, 2000 |
| CR# B2000-03870 | Failure of 1B RCFC to Start in High Speed | December 19, 2000 |

1R13 Maintenance Risk Assessments and Emergent Work Evaluation

| | | |
|--|--|--------------------|
| Byron Operating Department Policy 400-47 | On Line Risk / Protected Equipment | Revision 2 |
| Nuclear Station Procedure (NSP) OU- AA-103 | Shutdown Safety Management Program | Revision 1 |
| NSP OU-AP-104 | Shutdown Safety Management Program Byron/Braidwood Annex | Revision 2 |
| NSP WC-AA-103 | On-Line Maintenance | Revision 3 |
| CR# B2000-02721 | Missed Protected Equipment Signs Associated With the 1B Charging Pump | September 26, 2000 |
| CR# B2000-03735 | Loss of Spent Fuel Pool Cooling Concerns | December 8, 2000 |

1R14 Personnel Performance During Non-routine Plant Evolutions

| | | |
|---|---|--------------------|
| Unit 2 Byron General Operating Procedure (BGP) 100-2, | Plant Startup | Revision 20 |
| 2BGP 100-2A1 | Reactor Startup | Revision 14 |
| 2BGP 100-2T1 | Plant Startup Flowchart | Revision 9 |
| 2BGP 100-2T3 | Reactor Startup Flowchart | Revision 2 |
| 2BGP 100-3 | Power Ascension | Revision 28 |
| 2BGP 100-3T1 | Power Ascension Flowchart | Revision 12 |
| 2BGP 100-4, | Power Descension | Revision 14 |
| 2BGP 100-4T1 | Power Descension Flowchart | Revision 8 |
| 2BGP 100-5 | Plant Shutdown and Cooldown | Revision 26 |
| 2BGP 100-5 | Plant Shutdown and Cooldown Flowchart | Revision 13 |
| CR# B2000-02710 | BOP RH-6 Procedural Enhancement Identified | September 26, 2000 |
| CR# B2000-02838 | Unit 1 Excess Letdown Heat Exchanger Out-of-service (OOS) Error | October 1, 2000 |
| CR# B2000-02915 | Failure to Follow Procedures When Transferring Spent Fuel Pool Water | October 3, 2000 |

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|-----------------|--|-------------------|
| CR# B2000-03028 | Precursor Events in Implementation of the OOS Process | October 8, 2000 |
| CR# B2000-03447 | 1CV8392B Not Returned to As-found Position Following Maintenance | November 14, 2000 |

Condition Reports Written for Inspector Identified Issues

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|-----------------|--|-------------|
| CR# B2001-02105 | Insufficient Apparent Cause Evaluation | May 7, 2001 |
| CR# B2001-02106 | Failure to Document Deviations/Exceptions From BGP Flowchart | May 7, 2001 |

1R19 Post Maintenance Testing

| | | |
|--|---|------------|
| Unit 1 Byron Technical Surveillance Requirement Procedure (BVSR) 6.3.5-1 | Unit 1 Main Feedwater System Containment Isolation Valves Full Stroke Test | Revision 2 |
| 1BVSR 6.3.5-2 | Unit 1 Main Feedwater System Containment Isolation Valves Partial Stroke Test | Revision 2 |
| WR 990118093-01 | 2B SX Pump Overhaul | Revision 0 |
| WR 990118093-04 | 2B SX Pump - Pump Casing Weld Repairs as Needed | Revision 0 |
| WR 990228995-01 | 0A SX Makeup Pump - Install Fuel Oil System Check Valve Per Design Change Procedure 9900875 | Revision 1 |
| WR 990264689-01, | 2B SX Pump ASME [American Society of Mechanical Engineers] and Miscellaneous Check Valve Surveillance | Revision 0 |
| WR 99020728973-01 | 1FW009D - Hydraulic Pump of Valve Is Cycling Excessively | Revision 0 |
| WR 99020728973-04 | Calibrate Pressure Switch 1PS-FW177 | Revision 0 |
| WR 99020728973-07 | 1FW009D - Determinate/Reterminate Feedwater Isolation Valve Motor | Revision 0 |

1R20 Refueling and Outage Activities

| | | |
|--------------|---|-------------|
| BAP 370-3, | Administrative Control During Refueling | Revision 29 |
| 2BGP 100-1, | Plant Heatup | Revision 25 |
| 2BGP 100-1T1 | Plant Heatup Flowchart | Revision 14 |
| 2BGP 100-1T2 | Mode 5 to 4 Checklist | Revision 10 |

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| 2BGP 100-1T3 | Mode 4 to 3 Checklist | Revision 12 |
| 2BGP 100-1T5 | Containment Integrity Checklist | Revision 7 |
| 2BGP 100-2 | Plant Startup | Revision 20 |
| 2BGP 100-2A1 | Reactor Startup | Revision 14 |
| 2BGP 100-2T1 | Plant Startup Flowchart | Revision 9 |
| 2BGP 100-2T2, | Mode 3 to 2 Checklist | Revision 8 |
| 2BGP 100-2T3 | Reactor Startup Flowchart | Revision 2 |
| 2BGP 100-3 | Power Ascension | Revision 28 |
| 2BGP 100-3T1 | Power Ascension Flowchart | Revision 12 |
| 2BGP 100-3T2 | Mode 2 to 1 Checklist | Revision 7 |
| 2BGP 100-4 | Power Descension | Revision 14 |
| 2BGP 100-4T1 | Power Descension Flowchart | Revision 8 |
| 2BGP 100-5, | Plant Shutdown and Cooldown | Revision 26 |
| 2BGP 100-5 | Plant Shutdown and Cooldown Flowchart | Revision 13 |
| 2BGP 100-6 | Refueling Outage | Revision 28 |
| 2BGP 100-6T2 | Mode 6 to 5 Checklist | Revision 9 |
| 2BGP 100-6T4, | Core Alteration/Fuel Movement Checklist | Revision 9 |
| BOP CV-14 | Degassing the Reactor Coolant System and Pressurizer | Revision 20 |
| BOP RH-6 | Placing the RH [Residual Heat Removal] System in Shutdown Cooling | Revision 20 |
| 2BOSR 4.3.1-1 | Unit Two Reactor Coolant System Pressure/Temperature Limit Surveillance | Revision 4 |
| 2BOSR 4.c.1-1 | Unit Two Pressurizer Temperature Limit Surveillance | Revision 2 |
| 2BOSR Z.5.b.1-1 | Unit Two Containment Loose Debris Inspection | Revision 2 |
| 2BOSR 6.3.3-1 | Primary Containment Integrity Verification of Containment Isolation Devices | Revision 7 |
| 2BVSR 5.2.8-1 | Unit 2 Visual Inspection of the ECCS Recirculation Sumps | Revision 2 |

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|-----------------|---|-------------------|
| 2BVSR XPT-23 | Unit 2 Low Power Physics Test Program With the Westinghouse ADRC [Advanced Digital Reactivity Computer] | Revision 4 |
| NSP OU-AA-103 | Shutdown Safety Management Program | Revision 1 |
| NSP OU-AP-104 | Shutdown Safety Management Program Byron/Braidwood Annex | Revision 2 |
| | Byron Station Unit 2 Cycle 10 Core Loading Plan | |
| | Byron Station Unit 2 Pressure and Temperature Limits Report | June 28, 1999 |
| | Byron Station Unit 2 Cycle 10 Core Operating Limits Report | Revision 0 |
| | Nuclear Component Transfer List for Byron Unit 2 Cycle 9 Core Offload | |
| | Nuclear Component Transfer List for Byron Unit 2 Cycle 10 Core Reload | |
| | Byron/Braidwood Stations Updated Final Safety Analysis Report | |
| | Byron Station Technical Specifications | |
| CR# B2000-02914 | Lack of Controls for SFP [Spent Fuel Pool] Temporary Pumps | October 3, 2000 |
| CR# B2000-03051 | NRC Unit 1 Containment Walkdown Concerns | October 9, 2000 |
| CR# B2000-03063 | Reactor Coolant Pump Started by Control Room While Work Activities Were Still In Progress | October 9, 2000 |
| CR# B2000-03072 | 1D Reactor Coolant Pump Startup | October 10, 2000 |
| CR# B2000-03452 | Action Tracking Items Closed Without Final Action Being Performed | November 14, 2000 |
| CR# B2000-03935 | Common Cause Analysis Identifies Inadequate Contractor Supervisor Oversight | December 22, 2000 |
| CR# B2001-00145 | SFP Foreign Material Concern | January 11, 2001 |

Condition Reports Written for Inspector Identified Issues

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|-----------------|--|----------------|
| CR# B2001-01619 | Revision to TLCO [Technical Requirements Manual Limiting Condition for Operation] 3.9.c Issued With Flaw in the Action Condition | April 12, 2001 |
| CR# B2001-01822 | B2R09 Unit 2 Emergency Core Cooling System Recirculation Sump Inspection Discrepancies | April 19, 2001 |
| CR# B2001-01870 | Containment Recirculation Pump Cover Fastener Discrepancy | April 21, 2001 |
| CR# B2001-02143 | Containment Loose Debris Inspection Surveillance Concern | May 9, 2001 |
| CR# B2001-02197 | Discrepancies Found in Cooldown Surveillances | May 11, 2001 |

1R22 Surveillance Testing

| | | |
|--|--|------------|
| | American Society of Mechanical Engineers / American National Standards Institute (ASME/ANSI) OMa-1988 Addenda to ASME/ANSI OM-1987, Operation of Maintenance of Nuclear Power Plants, Part 10, Inservice Testing of Valves in Light-Water Reactor Power Plants | |
| Byron Special Process Procedure (SPP) 00-026 | Diesel Generator Governor Upgrade Setup and Construction Test | Revision 0 |
| 2BOSR 6.1.1-22 | Unit 2 Primary Containment Type C Local Leakage Rate Test of Safety Injection System | Revision 1 |
| 2BOSR 8.1.9-1 | Unit Two 2A Diesel Generator Safe Shutdown Sequencer and Single Load Rejection Test - 18 Month | Revision 0 |
| 2BOSR 8.1.10-1 | Unit Two 2A Diesel Generator Load Rejection and Overspeed Trip Surveillance 18 Month | Revision 0 |
| 2BOSR 8.1.11-1 | Unit Two 2A Diesel Generator Sequencer Test - 18 Month | Revision 0 |
| Byron Technical Procedure 800-39 | Byron Containment Leakage Rate Testing Program | Revision 4 |

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| 2BVSR AF-3 | Unit 2 Simultaneous Start of Both AF Pumps with Flow to the Steam Generators Byron/Braidwood Stations Updated Final Safety Analysis Report Byron Station Technical Specifications | Revision 6 |
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1R23 Temporary Plant Modifications

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|--|---|------------|
| Nuclear Station Procedure CC-AA-112 | Temporary Modifications | Revision 2 |
| DCP 9901021 | Remove Cable From Pre-amplifier Circuit for 2NR13EB (Post Accident Neutron Monitoring System) Due to Potential Moisture Build-up Within Cable | Revision 0 |
| 10 CFR 50.59 Safety Evaluation BRW-SE-1997-1570 | Temporary Alteration 97-2-013, Remove One Detector From Service on Unit 2 PANM [Post Accident Neutron Monitor] Channel B | Revision 0 |
| 10 CFR 50.59 Validation 6H-01-0047 | TMOD [Temporary Modification] DCP 9901021 | Revision 0 |
| Work Request 990275350-01 | Install TMOD 9901021 | Revision 0 |

2OS1 Access Control to Radiologically Significant Areas

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|-----------------|---|--------------------|
| | Focus Area Self-Assessment Report, Radiation Protection - High Radiation Area Controls/Postings for Byron | February 6-8, 2001 |
| CR# B2001-00180 | Inconsistent Posting | January 12, 2001 |
| CR# B2001-01563 | Lack of Adequate Radiological Controls Identified During a Plant Walkdown (RP) | April 10, 2001 |
| BAP 1450-3 | Access to Reactor Cavity Incore Area | Revision 7 |
| RP-AA-460 | Controls for High and Very High Radiation Areas | Revision 1 |

2OS2 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls

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|-----------------|--|-------------------|
| | B2R09 ALARA Index | April 19, 2001 |
| | Byron Radiological Action Plan | April 18, 2001 |
| | Byron Station Exposure Reduction Plan | 1996 - 2000 |
| | RP/ALARA Daily PODs | April 16-19, 2001 |
| CR# B2001-00523 | Failure to Follow RWP Requirements/Unclear Standards | February 2, 2001 |
| CR# B2001-00902 | 2CV06MA Work for B2R09; Lacking Detail | March 1, 2001 |
| CR# B2001-00921 | ALARA Outage Readiness Assessment | March 1, 2001 |
| CR# B2001-01387 | Radioisotopes Detected in SJAE Samples | April 3, 2001 |
| CR# B2001-01463 | Radiological Work Mock-up Standard Not Clearly Communicated | April 7, 2001 |
| CR# B2001-01771 | Reactor Vessel Bottom Incore Entry for Inspection by Engineering | April 17, 2001 |
| RP-AA-400 | ALARA Program | Revision 1 |
| RP-AA-401 | Operational ALARA Planning and Controls | Revision 1 |
| RP-AA-441 | Evaluation and Selection Process for Respirator Use | Revision 1 |
| RWP #012527 | S/G Eddy Current Testing, Tube Repairs & Inspections | Revision 0 |
| RWP #012528 | Remove/Install Secondary Side Covers & Sludge Covers. Perform Sludge Lance Activities & Inspection(s) | Revision 0 |
| RWP #012567 | Miscellaneous Valve Work: (CV Letdown Area on 412 OMB Only) | Revision 0 |
| RWP #012571 | Rx Head Disassembly and Reassembly Including Lift Prep, Cleaning Rx Head Studs, Conoseal & RVLS Removal & Installation | Revision 0 |
| RWP #012580 | Reactor Coolant Pumps: Inspection, Maintenance, and Repair (All loops) | Revision 0 |
| RWP #012707 | Replacement of N41/N42/N43/N44 Power Range Detectors | Revision 0 |

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| RWP #012748 | ISI Activities (IMB and OMB), Including Scaffolding, Insulation Removal/Restoration, Decon, Weld Prep & Examinations | Revision 0 |
| RWP #012751 | Snubbers: Remove, Inspect, Test and Reinstall (OMB/IMB), Including Scaffold, Insulation and Decon Support | Revision 0 |
| RWP #012795 | Rx Cavity Decon: Equipment Staging and Set Up, Removal and Associated Activities | Revision 1 |
| RWP #012822 | Scaffold: Staging, Building and Removal (OMB/IMB) | Revision 0 |