



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

October 15, 2002

Garry L. Randolph, Senior Vice  
President and Chief Nuclear Officer  
Union Electric Company  
P.O. Box 620  
Fulton, Missouri 65251

SUBJECT: NRC INSPECTION REPORT 50-483/02-05

Dear Mr. Randolph:

On October 5, 2002, the NRC completed an inspection at your Callaway Plant. The enclosed report documents the inspection findings which were discussed on October 4, 2002, with Mr. Ron Affolter, Vice President, 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. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

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

Sincerely,

*/RA/*

David N. Graves, Chief  
Project Branch B  
Division of Reactor Projects

Docket: 50-483  
License: NPF-30

Enclosure:  
NRC Inspection Report  
50-483/02-05

Union Electric Company

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Union Electric Company

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**ENCLOSURE**

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket: 50-483  
License: NPF-30  
Report: 50-483/02-05  
Licensee: Union Electric Company  
Facility: Callaway Plant  
Location: Junction Highway CC and Highway O  
Fulton, Missouri  
Dates: July 7 through October 5, 2002  
Inspectors: M. S. Peck, Senior Resident Inspector  
V. G. Gaddy, Senior Resident Inspector  
J. D. Hanna, Resident Inspector  
R. A. Kopriva, Senior Project Engineer  
R. E. Lantz, Senior Emergency Preparedness Inspector  
Approved By: D. N. Graves, Chief, Project Branch B

## SUMMARY OF FINDINGS

### Callaway Plant NRC Inspection Report 50-483/02-05

IR 05000483-02-05; on 07/07-10/05/2002; Union Electric Co; Callaway Plant. Integrated Resident & Regional Report.

The report covers a 13-week period of routine resident office and Regional office inspection activities from July 7 through October 5, 2002. No findings of significance were identified. The significance of findings is indicated by their color (Green, White, Yellow, or Red) using 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 website 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.

#### Inspector Identified Findings

No findings of significance were identified.

## Report Details

Summary of Plant Status: Union Electric Company operated the Callaway Plant at essentially full power during this inspection period.

### **1. REACTOR SAFETY**

#### **Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity**

#### 1R01 Adverse Weather Protection (71111.01)

##### a. Inspection Scope

The inspectors verified adequate protection from adverse weather effects for selected mitigating systems. The inspectors completed a walkdown of the plant electrical distribution systems and verified the licensee properly implemented Emergency Plan Implementing Procedure EIP-ZZ-00231, "Response to Severe Thunderstorm/High Winds/Tornado Watches and Warnings," Revision 13, on September 20, 2002. The inspectors also verified that operator actions, as defined in the licensee's adverse weather procedure, maintained the readiness of essential systems and adequate operator staffing.

##### b. Findings

No findings of significance were identified.

#### 1R04 Equipment Alignment (71111.04)

##### a. Inspection Scope

The inspectors completed three partial system walkdowns of safety significant equipment during the inspection period. The inspectors performed walkdowns to verify proper alignment and readiness of selected systems when redundant systems were removed from service for maintenance or testing. The inspectors completed the following partial walkdowns during the quarter:

- Train A Containment Spray: The inspectors walked down the Train A containment spray subsystem and verified correct mechanical and electrical alignments. The inspectors completed the walkdown on August 13, 2002, while the redundant containment spray subsystem was out of service for maintenance. The inspectors reviewed critical portions of system alignments using Final Safety Analysis Report, Section 6.2.2, "Containment Heat Removal Systems," and Drawing M-22EN01, "Piping and Instrumentation Diagram Containment Spray System," Revision 6. The walkdown included subsystem components located in the control room and the auxiliary building.
- Train B Essential Service Water: The inspectors walked down the Train B essential service water subsystem and verified correct mechanical and electrical alignment. The inspectors completed the walkdown on August 16, 2002, while the redundant essential service water subsystem was out of service for maintenance. The inspectors reviewed critical portions of system alignment

using Final Safety Analysis Report, Section 9.2.1, "Station Service Water System," and Drawing M-22EF01, "Piping and Instrumentation Diagram Essential Service Water," Revision 38. The inspectors' walkdown included system components located in the essential service water pump house and the auxiliary building.

- Train B Motor-Driven Auxiliary Feedwater Pump: The inspectors walked down the Train B motor-driven auxiliary feedwater pump. The inspectors completed the walkdown on August 25, 2002, while Train A was out of service for maintenance and testing. The inspectors verified correct mechanical and electrical alignment using Operations Procedure OTN-AL-00001, "Auxiliary Feedwater System," Revision 11, and Drawing M-22AL01(Q), "Piping and Instrumentation Diagram Auxiliary Feedwater System," Revision 17.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors performed five fire protection walkdowns to verify operational status and material condition of fire detection and mitigation systems, passive fire barriers, and suppression equipment. The inspectors reviewed the licensee's implementation of controls for combustible materials and ignition sources in selected fire protection zones. The inspectors compared plant conditions against descriptions and commitments described in Final Safety Analysis Report, Section 9.5.1, "Fire Protection System," and Appendix 9.5B, "Fire Hazard Analysis." The inspected areas included:

- Fire Zone UNPH, Essential service water pump house, completed on July 16, 2002
- Fire Zone C-10, Engineered safety features switchgear Room B, completed on July 17, 2002
- Fire Zone UNCT, Ultimate heat sink cooling tower fan room, completed on July 24, 2002
- Fire Zones A-2 and A-4, Safety-related pump area, Rooms 1107-1114, completed on September 29, 2002
- Fire Zone A-7, Boron injection Room 1126, completed on September 29, 2002

b. Findings

No findings of significance were identified.



1R07 Heat Sink Performance (71111.07)

a. Inspection Scope

The inspectors completed an in-office review of the Train B containment cooler flow test on September 4, 2002. The inspectors verified that the test demonstrated adequate containment cooler flow and that the coolers were capable of performing the design basis function. The inspectors compared test results against Operations Procedure OSP-EF-P001B, "ESW Train B Inservice Test," Revision 37; Technical Specifications; and Final Safety Analysis Report, Section 6.2.2, "Containment Heat Removal Systems."

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors independently evaluated the licensee's maintenance effectiveness by performing an in-office review of the availability and reliability of risk-significant structures, systems, and components. The inspectors reviewed the licensee's implementation of the Maintenance Rule for motor-driven auxiliary feedwater pump flow control Valve ALHV005, which had previously displayed performance problems. The inspectors also reviewed whether the licensee performed correct Maintenance Rule scoping and characterization of failed structures, systems, and components by an in-office review of Administrative Procedure APA-ZZ-00303, "Classification of Systems," Revision 5; Engineering Procedure EDP-ZZ-01128, "Maintenance Rule and EPIX Programs, Revision 2; Regulatory Guide 1.160, "Monitoring the Effectiveness of Nuclear Power Plants," Revision 2; and review of minutes from various expert technical panel meetings.

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

The inspectors completed an in-office review of the licensee's risk assessment and management of four selected maintenance activities. The inspectors assessed the effectiveness of the licensee's risk management for both planned and emergent activities. The inspectors compared the licensee's risk assessment and risk management activities against the requirements of 10 CFR 50.65(a)(4); the recommendations of NUMARC 93-01, "Industry Guidelines for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 3; and Engineering

Procedure EDP-ZZ-01129, "Callaway Plant Risk Assessment," Revision 2. The inspectors evaluated the following risk assessments during the inspection:

- Unavailability of Train A ultimate heat sink cooling tower and essential service water Pump A, reviewed July 27, 2002
- Unavailability of Train B residual heat removal, reviewed August 13, 2002
- Unavailability of Train A essential service water pump, reviewed August 14, 2002
- Unavailability of Train B motor-driven auxiliary feedwater pump, reviewed October 3, 2002

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors completed an in-office review of the technical adequacy of four operability evaluations and verified that the licensee provided sufficient justification for continued operation of each system or component. The inspectors verified that each operability evaluation provided adequate justification that degraded equipment still met Technical Specifications, Final Safety Analysis Report, and design basis requirements. The inspectors also verified that the licensee thoroughly evaluated potential risk increase attributed to degraded equipment. The inspectors reviewed the following operability evaluations:

- Pinhole leak downstream of component cooling water heat Exchanger A outlet valve, reviewed August 7, 2002
- Refueling water storage tank to residual heat removal suction valve, reviewed August 14, 2002
- Motor-driven auxiliary feedwater Pump B discharge piping vibration, reviewed September 5, 2002
- Significant vibration levels on areas of the discharge piping of motor-driven auxiliary feedwater Pump A, reviewed September 10, 2002

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors observed and/or performed in-office reviews of five postmaintenance tests. The inspectors verified that each testing scope adequately demonstrated system operability and capability. The inspectors used Technical Specifications, the Final Safety Analysis Report, and ASME Section XI to determine system and component requirements. The inspectors' review included the following postmaintenance tests:

- Train B component cooling water pump, reviewed July 18, 2002
- Refueling water storage tank to residual heat removal suction isolation valve, reviewed August 13, 2002
- Component cooling water from radwaste return isolation valve, reviewed August 14, 2002
- Train A motor-driven auxiliary feedwater pump, reviewed August 25, 2002
- Train A emergency diesel generator, observed September 25, 2002

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors verified that surveillance tests completed on four risk-significant systems and components met Technical Specifications, Final Safety Analysis Report, and procedural requirements. The inspectors performed the verifications by witnessing and/or in-office review. The inspectors evaluated whether surveillance tests adequately demonstrated that systems were capable of performing their intended safety and design-basis functions. The inspectors specifically evaluated each selected surveillance test for preconditioning, adequate acceptance criteria, calibration of test equipment, and proper equipment restoration. The inspectors reviewed the following surveillance activities during the inspection:

- Operations Procedure OSP-AL-P0002, "Turbine Driven Auxiliary Feedwater Pump Operability Inservice Test," Revision 34, reviewed July 16, 2002
- Operations Procedure OSP-GK-0002A, "Train A Control Room Ventilation and Pressure Test," Revision, reviewed August 19, 2002
- Operations Procedure OSP-AL-P001A, "Motor Driven Auxiliary Feedwater Pump 'A' Run," Revision 31, reviewed August 25, 2002

- Operations Procedure OSP-EF-P001A, "Essential Service Water Pump 'A' Inservice Test", Revision 37, reviewed August 26, 2002

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors completed a review of the temporary modification to the mechanical clamp installed downstream of Valve EFV0058 (essential service water Train A from component cooling water heat Exchanger A EFHV0059 bypass isolation) on August 23, 2002. The inspectors verified that the temporary modification did not result in a departure from the design basis and system success criteria as defined in the Final Safety Analysis Report. The inspectors also verified that the modification was performed in accordance with applicable regulations and licensee requirements by an in-office review of the supporting 10 CFR 50.59 screening evaluation.

b. Findings

No findings of significance were identified.

**Cornerstone: Emergency Preparedness**

1EP2 Alert Notification System Testing (71114.02)

a. Inspection Scope

The inspectors interviewed licensee emergency preparedness staff members and reviewed the following licensee documents to determine the adequacy of testing methods for the alert and notification system in accordance with 10 CFR Part 50, Appendix E. The licensee's siren testing program was compared with guidance in NUREG-0654 and Federal Emergency Management Agency REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants."

- Emergency Plan Implementing Procedure EIP-ZZ-A0020, "Maintaining Emergency Preparedness," Revision 20
- Siren testing schedules and reports for fourth quarter 2001 through second quarter 2002
- Emergency Preparedness Departmental Surveillance Procedure KSP-ZZ-00001, "Alert and Notification Availability," Revision 3

- Emergency Surveillance Test ST-12096, "Test Emergency Siren Alerting System," test results for January through July 2002

b. Findings

No findings of significance were identified.

1EP3 Emergency Response Organization Augmentation Testing (71114.03)

a. Inspection Scope

The inspectors interviewed licensee emergency preparedness staff members and reviewed the following documents related to the emergency response organization augmentation system to determine the licensee's ability to staff emergency response facilities in accordance with the licensee's emergency plan and the requirements of 10 CFR Part 50, Appendix E:

- Emergency Plan Implementing Procedure EIP-ZZ-00200, "Augmentation of the Emergency Organization," Revision 10
- Emergency Preparedness Departmental Surveillance Procedure KSP-ZZ-00003, "Augmentation," Revision 2
- Emergency Plan Implementing Procedure EIP-ZZ-A0066, "RERP Training Program," Revision 5
- Emergency Plan, Revision 24
- Emergency response organization training and drill attendance records
- Emergency Surveillance Test ST-12064, "Emergency Augmentation System Test," test results for March and June 2002

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)

a. Inspection Scope

The inspectors reviewed Temporary Change Notice TCN 01-0508 to Emergency Plan Implementing Procedure EIP-ZZ-00101, "Classification of Emergencies," submitted December 20, 2001, against 10 CFR 50.54(q) to determine if the revisions decreased the effectiveness of the emergency plan.

b. Findings

No findings of significance were identified.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies (71114.05)

a. Inspection Scope

The inspectors reviewed the following documents related to the licensee's corrective action program to determine the licensee's ability to identify and correct problems in accordance with the requirements of 10 CFR 50.47(b)(14) and 10 CFR Part 50, Appendix E:

- Administrative Procedure APA-ZZ-00500, "Corrective Action Program," Revision 32
- Summaries of Callaway action request system documents related to the emergency preparedness department from July 2001 through July 2002
- Self-Assessment Report SA 02-EP-001, dated June 24, 2001
- STARS Round-Robin Assessment of Emergency Preparedness, SA 02-EP-002, dated May 28, 2002
- Detailed information for 22 selected Callaway action request system documents

b. Findings

No findings of significance were identified.

1EP6 Drill Evaluation (71114.06)

a. Inspection Scope

The inspectors observed plant drills from the technical support center and plant simulator on August 14 and October 2, 2002. The inspectors evaluated the adequacy of the licensee's drill conduct and the subsequent critiques of drill performance. The inspectors also evaluated personnel performance, licensee event classification, notification of state and local authorities, and the adequacy of protective action recommendations. The inspectors used the following procedures to evaluate licensee performance:

- Operations Procedure ODP-ZZ-0025, "Emergency Operating Procedure Usage," Revision 4
- Emergency Operating Procedure E-0.0, "Reactor Trip or Safety Injection," Revision 1B5

- Emergency Operating Procedure ECA-0.1, "Loss of All AC Power," Revision 1B2
- Emergency Plan Implementing Procedure EIP-ZZ-00100, "Classification of Events," Revision 30
- Emergency Plan Implementing Procedure EIP-ZZ-00201, "Notifications," Revision 36

b. Findings

No findings of significance were identified.

**3. SAFEGUARDS**  
**Cornerstone: Physical Protection**

3PP3 Response to Contingency Events (71130.03)

The Office of Homeland Security developed a Homeland Security Advisory System to disseminate information regarding the risk of terrorist attacks. The Homeland Security Advisory System implements five color-coded threat conditions with a description of corresponding actions at each level. NRC Regulatory Information Summary 2002-12a, dated August 19, 2002, "NRC Threat Advisory and Protective Measures System," discusses the Homeland Security Advisory System and provides additional information on protective measures to licensees.

a. Inspection Scope

On September 10, 2002, the NRC issued a Safeguards Advisory to reactor licensees to implement the protective measures described in Regulatory Information Summary 2002-12a in response to the Federal government declaration of threat level "orange." Subsequently, on September 24, 2002, the Office of Homeland Security downgraded the national security threat condition to "yellow" with a corresponding reduction in the risk of a terrorist threat.

The inspectors interviewed licensee personnel and security staff, observed the conduct of security operations, and assessed licensee implementation of the threat level "orange" protective measures. Inspection results were communicated to the Region and Headquarters security staff for further evaluation.

b. Findings

No findings of significance were identified.

#### 4. OTHER ACTIVITIES

##### 4OA1 Performance Indicator Verification (71151)

##### .1 Drill and Exercise Performance

##### a. Inspection Scope

The inspectors reviewed the following documents related to the drill and exercise performance indicator in order to verify that the licensee's data was reported in accordance with the requirements of Nuclear Energy Institute 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2:

- Drill schedules for calendar years 2001 and 2002
- Drill evaluation records and worksheets
- Performance indicator summary sheets
- Performance indicator reports
- Drill records for 100 percent of the drills and exercises counted in drill and exercise performance statistics for the fourth quarter of calendar year 2001 through the second quarter of calendar year 2002

##### b. Findings

No findings of significance were identified.

##### .2 Emergency Response Organization Drill Participation

##### a. Inspection Scope

The inspectors reviewed the following records related to emergency response organization participation in order to verify the licensee's data was reported in accordance with the requirements of Nuclear Energy Institute 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2:

- List of key emergency response organization positions
- Performance indicator summary sheets
- Performance indicator reports
- Emergency response organization rosters for calendar year 2002



- Drill participation records for a sample of eight emergency response organization members

b. Findings

No findings of significance were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors reviewed siren testing records for the fourth quarter of calendar year 2001 through the second quarter of calendar year 2002 to verify that the licensee's data was reported in accordance with the requirements of Nuclear Energy Institute 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2. The inspectors also reviewed the reported performance indicator data.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems (71152)

a. Inspection Scope

The inspectors reviewed the licensee's corrective actions for Callaway Action Request System Number 20025067, a secondary pinhole leak near the Valve EFHV-0058 flange weld, and Callaway Action Request System Number 20023911, safety monitor red condition entered. The inspectors performed an in-office review of these significant conditions adverse to quality to ensure that equipment, human performance, and programmatic issues were identified by the licensee at an appropriate level and that those issues were entered into the problem identification and resolution program. The inspectors assessed the effectiveness of the licensee's corrective actions.

b. Findings

No findings of significance were identified.

4OA3 Event Followup (71111.14)

- .1 (Closed) Unresolved Item 50-483/0107-02: Failure to assess and manage risk when condenser steam dump valve was removed from service

The licensee reassessed plant risk following removal of the condenser steam dump valve from service and determined that the plant was not in an elevated risk condition (yellow) during this time period (Callaway Action Request System Number 200201856). The inspectors completed an in-office review of the licensee's risk assessment and concurred with the conclusion. The inspectors concluded that the degraded equipment

did not result in a higher risk condition and a contingency plan to manage the risk was not required. This unresolved item is closed and no findings of significance were identified.

4OA6 Management Meetings

Exit Meeting Summary

The inspector presented the results related to the emergency preparedness inspection to Mr. R. Affolter, Vice President, and other members of licensee management at the conclusion of the inspection on August 8, 2002.

The resident inspectors presented their inspection results to Mr. R. Affolter, Vice President, and other members of licensee management on October 4, 2002.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

R. Affolter, Vice President, Nuclear  
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S. Crawford, Evaluator, Protective Services  
M. Evans, Manager, Nuclear Engineering  
L. Graessle, Superintendent, Protective Services  
T. Parker, Evaluator, Protective Services  
G. Pendergraff, Evaluator, Protective Services  
D. Trokey, Evaluator, Protective Services  
W. Witt, Plant Manger

ITEMS CLOSED

50-483/0107-02      URI      Failure to assess and manage risk when condenser steam dump valve was removed from service (Section 40A3)

DOCUMENTS REVIEWED

The following documents were selected and reviewed by the inspectors to accomplish the objectives and scope of the inspection and to support any findings:

Desk Guide, "Emergency Preparedness Tone Alert Radio Distribution/Database Maintenance"

EIP-ZZ-00201, "Notifications," Revision 36

EIP-ZZ-00212, "Protective Action Recommendations," Revision 20