



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

January 24, 2003

Southern Nuclear Operating Company, Inc.  
ATTN: Mr. J. B. Beasley, Jr.  
Vice President  
P. O. Box 1295  
Birmingham, AL 35201-1295

**SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT - NRC INTEGRATED INSPECTION  
REPORT 50-348/02-05 AND 50-364/02-05**

Dear Mr. Beasley:

On January 4, 2003, the Nuclear Regulatory Commission (NRC) completed an inspection at your Farley Nuclear Plant. The enclosed integrated inspection report documents the inspection findings discussed on January 13, 2003, with Mr. Don Grissette and other members of your staff.

This inspection examined activities conducted under your license relating to safety and compliance with the Commission's rules and regulations and the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. This report documents one self-revealing finding of very low safety significance (Green).

Since the terrorist attacks on September 11, 2001, the NRC has issued two Orders (dated February 25, 2002, and January 7, 2003) and several threat advisories to licensees of commercial power reactors to strengthen licensee capabilities, improve security force readiness, and enhance access authorization. The NRC also issued Temporary Instruction 2515/148 on August 28, 2002, that provided guidance to inspectors to audit and inspect licensee implementation of the interim compensatory measures (ICMs) required by the February 25<sup>th</sup> Order. Phase 1 of TI 2515/148 was completed at all commercial nuclear power plants during calendar year (CY) '02, and the remaining inspections are scheduled for completion in CY '03. Additionally, table-top security drills were conducted at several licensees to evaluate the impact of expanded adversary characteristics and the ICMs on licensee protection and mitigative strategies. Information gained and discrepancies identified during the audits and drills were reviewed and dispositioned by the Office of Nuclear Security and Incident Response. For CY '03, the NRC will continue to monitor overall safeguards and security controls, conduct inspections, and resume force-on-force exercises at selected power plants. Should threat conditions change, the NRC may issue additional Orders, advisories, and temporary instructions to ensure adequate safety is being maintained at all commercial power reactors.

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Sincerely,

*/RA/*

Brian R. Bonser, Chief  
Reactor Projects, Branch 2  
Division of Reactor Projects

Docket Nos. 50-348 and 50-364  
License Nos. NPF-2 and NPF-8

Enclosure: NRC Integrated Inspection  
Report 50-348/02-05 and 50-364/02-05

cc w/encl: (See page 3)

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.: 50-348 and 50-364

License Nos.: NPF-2 and NPF-8

Report Nos.: 50-348/02-05 and 50-364/02-05

Licensee: Southern Nuclear Operating Company, Inc. (SNC)

Facility: Farley Nuclear Plant, Units 1 and 2

Location: 7388 N. State Highway 95  
Columbia, AL 36319

Dates: September 29, 2002 to January 4, 2003

Inspectors: T. Johnson, Senior Resident Inspector (SRI), Reactor Projects Branch 2  
C. Rapp, Senior Project Engineer, Reactor Projects Branch 2  
G. McCoy, Resident Inspector (RI), Reactor Projects Branch 5  
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E. Testa, Senior Health Physics Specialist, Plant Support Branch (Sections 2OS1, 2OS2, and 2PS2)  
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K. Davis, Security Specialist, Plant Support Branch (Section 4OA5)

Approved by: Brian R. Bonser, Chief  
Reactor Projects, Branch 2  
Division of Reactor Projects

Enclosure

## SUMMARY OF FINDINGS

IR 05000348/02-05, IR 05000364/02-05, Southern Nuclear Operating Company, September 29, 2002, through January 4, 2003, Joseph M. Farley Nuclear Plant, Units 1 & 2, Event Followup.

The report covered a three month period of inspection by resident inspectors and announced inspection by regional health physics inspectors and a regional physical security inspector. One Green finding was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609 "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

### A. Inspector Identified and Self-Revealing Findings

#### Cornerstone: Mitigating Systems

- Green. Improper scheduling of vendor recommend 10 year overhaul of 1C Service Water pump motor.

A self-revealing finding was identified for the 1C Service Water pump motor failure. This finding is greater than minor significance because it adversely impacted the ultimate heat sink reliability and affected the mitigating systems cornerstone objective. Because there was no loss of system function, this finding is of very low safety significance. (Section 4OA3.2)

### B. Licensee Identified Violation

None.

## REPORT DETAILS

### Summary of Plant Status

Unit 1 began the period at 100% rated thermal power (RTP). On October 15, the unit was manually tripped when control rod F-6 dropped from 221 steps to 198 steps during routine control rod insertion. The licensee determined that a diode in the control rod drive control cabinet failed. The diode was replaced and the unit was restarted on October 16. The unit operated at 100% RTP until December 10 when the unit was manually tripped due to the loss of both steam generator feedwater pumps (SGFPs). The licensee determined that the SGFPs tripped when a worker bumped a breaker that controlled the pumps. The unit was restarted on December 11. The unit operated at 100% RTP for the remainder of the inspection period.

Unit 2 began the period shut down for a planned refueling outage. The unit restarted on October 27 and achieved 100% RTP on October 31. The unit operated at 100% RTP for the remainder of the inspection period.

#### 1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

##### 1R01 Adverse Weather Protection

###### a. Inspection Scope

The inspectors evaluated the implementation of Procedure FNP-0-AP-21.0, Severe Weather; and Procedure FNP-0-SOP-0.12, Cold Weather Contingencies, to determine if required compensatory measures for equipment affected by cold weather were satisfactorily completed. The inspectors reviewed the implementation of licensee procedure FNP-1(2)-EMP-1383.01, Freeze Protection Inspections, which checked the units' freeze protection circuit thermostats. The inspectors walked down safety-related, risk significant, and fire protection equipment to verify adequate cold weather protection measures were taken. The equipment included the following:

- Unit 1 & 2 Condensate Storage Tanks and associated instrumentation
- Unit 1 & 2 Reactor Water Storage Tanks
- Fire Protection Tanks and associated pump house
- Unit 1 & 2 Plant Vent Stack Radiation Monitors
- Unit 1 Circulating Water Structure
- Unit 1 & 2 Auxiliary Feedwater (AFW) Flow Transmitters
- Unit 1 & 2 Steam Generator pressure transmitters.

###### b. Findings

No findings of significance were identified.

##### 1R04 Equipment Alignment

###### a. Inspection Scope

The inspectors performed partial walk downs of the following three systems to verify the systems listed below were properly aligned when redundant systems or trains were out of service. The walk downs were performed using the criteria in licensee procedures

FNP-0-AP-16, Conduct of Operations - Operations Group; and FNP-0-SOP-0, General Instructions to Operations Personnel. The walk downs included reviewing the Updated Final Safety Analysis Report (UFSAR), plant procedures and drawings listed in the attachment, and checks of control room and plant valves, switches, components, electrical power line-ups, support equipment, and instrumentation. Documents reviewed are listed in the Attachment.

- Unit 1 A train Residual Heat Removal (RHR) System
- 1B and 2B Emergency Diesel Generators (EDGs)
- Units 1 and 2 Service Water (SW) Systems

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors conducted a walk down of the six fire areas listed below to verify the licensee's control of transient combustibles, the operational readiness of the fire suppression system, and the material condition and status of fire dampers, doors, and barriers. The inspectors also checked that compensatory measures, including fire watches, were in place for degraded fire barriers. The requirements were described in licensee procedures FNP-0-AP-36, Fire Surveillance and Inspection; FNP-0-AP-38, Use of Open Flame; and FNP-0-AP-39, Fire Patrols and Watches. Documents reviewed are listed in the Attachment. The fire areas checked included the following:

- Diesel Generator Building Fire Areas 57 and 62
- Auxiliary Building Fire Areas 1-6, 1-18A, 1-19A, and 2-34A

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors observed portions of the licensed operator training and testing program to verify implementation of procedures FNP-0-AP-45, Farley Nuclear Plant Training Program, FNP-0-TCP-17.6, Simulator Training Evaluation Documentation, and FNP-0-TCP-17.3, Licensed Operator Continuing Training Program. The inspectors observed scenarios conducted in the licensee's simulator for a loss of off-site power, loss of coolant accident, and an off-site radioactive release. The inspectors observed high risk operator actions, overall performance, self-critiques, training feedback, and management oversight to verify operator performance was evaluated against the performance standards of the licensee's scenario. In addition, the inspectors observed implementation of the applicable emergency operating procedures listed in the attachment to verify that licensee expectations in procedures FNP-0-AP-16 and FNP-0-TCP-17.6 were met.



b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed condition report (CR) 2002002089, 1-2A EDG Speed Control Failure, to verify implementation of licensee procedures FNP-0-M-87, Maintenance Rule Scoping Manual; FNP-0-SYP-19, Maintenance Rule Performance Criteria; and FNP-0-M-89, FNP Maintenance Rule Site Implementation Manual; and compliance with 10 CFR 50.65. The inspectors assessed the licensee's evaluation of functional failures, maintenance preventable functional failures, repetitive failures, availability and reliability monitoring, and system specialist involvement. The inspectors also interviewed maintenance personnel, system specialists, the maintenance rule coordinator, and operations personnel to assess their knowledge of the program.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation

a. Inspection Scope

The inspectors assessed the licensee's planning and control for the following six planned licensee activities to verify the requirements in licensee procedures FNP-0-ACP-52.1, Guidelines for Scheduling of On-Line Maintenance; AP-FNP-0-AP-52, Equipment Status Control and Maintenance Authorization; and FNP-0-AP-16, Conduct of Operations - Operations Group; and the Maintenance Rule risk assessment guidance in 10 CFR 50.65 a(4) were met.

- Unit 2 outage activities affecting Unit 1 shared systems
- Unit 1 A RHR pump outage
- Unit 1 and Unit 2 1-2A EDG speed control failure concurrent with switch yard work
- 1-2A EDG two-year overhaul
- Unit 1 A SW pump preventive maintenance
- 2A Charging pump maintenance concurrent with a rod drive motor generator set overhaul

b. Findings

No findings of significance were identified.

## 1R14 Personnel Performance During Non-routine Plant Evolutions

### a. Inspection Scope

For the non-routine events described below, the inspectors assessed the licensee's use of operating procedures, annunciator procedures, abnormal and emergency operating procedures, control room actions, command and control, post trip recovery, management involvement, training expectations, and communication. The inspectors reviewed operator logs, plant computer data, control room strip charts, post trip report, and discussed actions with operations personnel. Documents reviewed are listed in the Attachment.

- On October 15, the inspectors observed the site response to a Unit 1 dropped control rod. Control rod F-6 dropped from 221 steps to 198 steps during a routine rod insertion of the D control bank. The unit was manually tripped as required by procedure FNP-1-AOP-19, Control Rod Malfunction. The licensee determined that a diode in the control rod drive control cabinet failed. The diode was replaced and the unit restarted on October 16.
- On December 10, the inspectors observed the site response to a Unit 1 loss of all main feedwater. The loss of feedwater occurred when the switchgear feeder breaker that controlled the SGFPs was inadvertently opened causing both operating SGFPs to trip. The breaker was reset and the unit was restarted on December 11.

### b. Findings

No findings of significance were identified.

## 1R15 Operability Evaluations

### a. Inspection Scope

The inspectors reviewed the following five operability evaluations to verify they met the requirements of licensee procedures FNP-0-AP-16 and FNP-0-ACP-9.2, Operability Determination (OD), and reviewed for technical adequacy, consideration of degraded conditions, and identification of compensatory measures. The inspectors reviewed the evaluations against the design bases, as stated in the UFSAR and Functional System Descriptions (FSD), to verify system operability was not affected.

- OD-02-10, Unit 2 TDAFW suction relief valve body to bonnet leak
- OD-02-09, Unit 2 A train SW minimum flow line pin hole leak
- EVAL-02-154, Unit 2 Stuck Control Rod and Loose Parts Evaluation (Westinghouse)

- OD-02-06, 1C Charging pump in service test parameter changes
- 1-2A EDG exhaust leak

b. Findings

No findings of significance were identified.

1R16 Operator Work-Arounds

a. Inspection Scope

The inspectors reviewed the following three operator work-arounds to verify that system functional capability or human performance were not affected, and the prioritization of required actions met the requirements of licensee procedure FNP-0-ACP-17, Operator Work-Arounds.

- Unit 6A feedwater heater relief valve isolation
- Unit 1 1A Heater Drain Pump (HDP) failure to trip on low tank level
- Unit 2B HDP failure to trip on low tank level

The inspectors also reviewed the cumulative effects of the operator work-arounds to verify they did not affect the operators' ability to perform actions in both abnormal and emergency operating procedures, did not increase initiating event frequency, and did not affect multiple mitigating systems.

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed the following five plant modifications to verify the implementation of licensee procedure FNP-0-AP-8, Design Modification Control. This included verification that the design bases, licensing bases, and performance capability of risk significant structures, systems, and components would not be degraded through the modifications, and the modifications would not place the plant in an unsafe condition. The inspectors also observed the Plant Operations Review Committee approval of these Design Change Packages (DCPs), discussed the modifications with engineering and operations personnel, and reviewed the related procedures and drawings. The inspectors reviewed the following DCPs:

- 02-1-9788, Unit 1 Cooling Towers Replacement
- 02-2-9705, TDAFW Pump Monitoring and Testing System
- 02-2-9731, Unit 2 Main Steam Hangar and Support Replacements
- 02-2-9777, Unit 2 Main Steam Hangar and Support Replacements
- 02-2-9801, Unit 2 Main Steam Hangar and Support Replacements

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors reviewed the criteria contained in licensee procedures FNP-0-ACP-52.1, Guidelines for Scheduling of On-Line Maintenance, and AP-FNP-0-AP-52, Equipment Status Control and Maintenance Authorization, to verify post-maintenance test procedures and test activities for the following six systems were adequate to demonstrate system operability and functional capability.

- 1A RHR pump post-maintenance outage testing
- 1B battery charger testing
- 1-2A EDG 24 month post-overhaul testing
- 1A SW pump post-maintenance outage testing
- 2A Charging pump post-maintenance outage testing
- Unit 1 control rod drive system

b. Findings

No findings of significance were identified.

1R20 Refueling and Outage Activities

a. Inspection Scope

The inspectors reviewed the following activities related to the Unit 2 refueling outage for conformance to licensee Procedures FNP-0-UOP-4.0, General Outage Operations Guideline; and FNP-2-UOP-4.1, Refueling Outage Operation. Surveillance tests were reviewed to verify results were within the Technical Specification (TS) required specification. Shut down risk, management oversight, procedural compliance, and operator awareness were evaluated for each of the following activities. Documents reviewed are listed in the Attachment.

- Refueling risk plans, contingencies, and schedules
- Decay heat removal and spent fuel pool cooling systems operations
- Core refueling operations
- Outage-related surveillance tests
- Reactor coolant drain down and reduced inventory activities
- Reactor mode changes, and unit heat up and pressurization activities
- Work and test control, task manager conduct, outage control center oversight and communications, clearance activities, inventory and reactivity control, and operations outage conduct
- Refueling outage risk and safety oversight
- Electrical system alignments and availability
- Problem identification and resolution activities

- Reactor startup and initial criticality testing
- Unit power ascension and full power testing

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors either witnessed the test or reviewed test records for the following seven surveillances to determine if the test adequately demonstrated equipment operability and met the TS requirements. The inspectors reviewed the activities to assess for preconditioning of equipment, procedure adherence, and valve alignment following completion of the surveillance. The inspectors reviewed licensee procedures FNP-0-AP-24, Test Control; FNP-0-M-050, Master List of Surveillance Requirements; and FNP-0-AP-16; and attended selected briefings to determine if procedure requirements were met. Documents reviewed are listed in the Attachment.

- FNP-1-STP-11.1, 1A RHR Pump Inservice Test
- FNP-2-STP-18.4, Containment Refueling Integrity Verification
- FNP-2-STP-40.0, Safety Injection With Loss of Offsite Power Test
- FNP-0-STP-80.1, 1-2A EDG Operability Test
- FNP-2-STP-22.1, 2A AFW Pump Quarterly Inservice Test
- FNP-2-STP-22.2, 2B AFW Pump Quarterly Inservice Test
- FNP-1-STP-29.6, Calculation of Estimated Critical Position

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors reviewed minor departure MD-02-2719, Unit 2 Fuel Transfer Assembly Sheaves and Bushings, and associated 10 CFR 50.59 screening criteria against the system design bases information and documentation, and the licensee's temporary modifications procedure FNP-0-AP-8, Design Modification Control. The inspectors reviewed implementation, configuration control, post-installation test activities, drawing and procedure updates, and operator awareness for this temporary modification.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation

a. Inspection Scope

The inspectors observed an emergency and simulator drill on November 7 to verify the licensee was properly classifying the event, making required notifications, making protective action recommendations, and conducting self-assessments. The drill included activation of all emergency response facilities. The inspectors used procedure FNP-0-EIP-15.0, Emergency Drills, as the inspection criteria.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control To Radiologically Significant Areas

a. Inspection Scope

Access Controls: During the week of September 16, 2002, licensee activities for controlling and monitoring worker access to radiologically significant areas and tasks associated with the Unit 2 Refueling Outage were evaluated. The inspectors evaluated procedural guidance; directly observed implementation of administrative and established physical controls; appraised radiation worker and technician proficiency in implementing radiation protection (RP) activities and assessed worker exposures to radiation and radioactive material.

The inspectors evaluated work in airborne radioactivity areas, radiation areas, high radiation areas (HRAs), locked high radiation areas (LHRAs) defined as exclusion areas by the licensee, and very high radiation areas (VHRAs). The tasks observed included shielding and scaffolding activities, reactor head inspection, movement of the upper internals, reactor coolant pump maintenance, and a pressurizer valve handling and movement evolution.

The inspectors attended pre-job briefings and reviewed radiation work permits (RWPs) to evaluate communication of radiological control requirements to workers. Occupational workers' adherence to selected RWPs and Health Physics (HP) technician proficiency in providing job coverage were evaluated through direct observations and interviews with licensee staff.

For HRA tasks involving significant dose gradients, the inspectors evaluated the use and placement of dosimetry to monitor worker exposure. Electronic dosimetry (ED) alarm set points and worker stay times were evaluated against area radiation survey

results where dose rates could change significantly as a result of plant shutdown and refueling operations.

Postings for access to radiological control areas (RCAs) and physical controls for Reactor Building and Auxiliary Building locations designated as LHRAs and VHRAs were evaluated during facility tours. The inspectors independently measured radiation dose rates and directly observed conduct of licensee radiation surveys and results for three high radiation areas. Survey results were compared to current surveys and assessed against established postings and controls.

Licensee controls for airborne radioactivity areas with the potential for individual worker internal exposures of greater than 50 millirem (mrem) Committed Effective Dose Equivalent (CEDE) were evaluated. For selected RWPs identifying potential airborne areas, i.e., head inspection activities and cavity flood-up following reactor head lift, the inspectors evaluated the effectiveness of administrative and physical controls including barrier integrity, engineering controls, and postings.

Radiation protection activities were evaluated UFSAR § 12, Radiation Protection; 10 CFR 19.12; 10 CFR 20, Subparts B, C, F, G, H, and J; TS § 5.7, High Radiation Area Controls; and procedures listed in the Attachment to this report.

Problem Identification and Resolution: Licensee corrective actions associated with access controls were reviewed. Licensee CRs reviewed and evaluated in detail during inspection of this program area are identified in the Attachment. The inspectors assessed the licensee's ability to identify, characterize, prioritize, and resolve the identified issues in accordance with the licensee procedure FNP-0-AP-30, Preparation and Processing Condition Reports.

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

ALARA: Implementation of the licensee's ALARA program during the Unit 2 Refueling Outage 15 was observed and evaluated by the inspectors during the weeks of September 16, 2002, and September 30, 2002. The inspection included evaluation of ALARA activities for high person-rem jobs, assessment of licensee source-term reduction efforts, and review of historical dose data. The high dose jobs evaluated were:

- Inspection underneath reactor head
- Upper internals removal
- Lower internals replacement

The jobs and implementation of ALARA principles were observed via closed-circuit television. Projected dose was compared to actual dose and any differences were discussed with the ALARA staff. Any changes to dose budgets relative to changes in job scope were also discussed. The inspectors reviewed ALARA committee meeting minutes and evaluated ALARA initiatives for these and other outage jobs. The inspectors attended pre-job briefings and evaluated communication of ALARA goals, RWP requirements, and industry lessons-learned to job crew personnel. Maintenance department understanding of dose budgets and ALARA concepts was assessed through discussions with radiation workers and job sponsors. Management support for ALARA was evaluated through interviews with ALARA staff and the Radiation Protection Manager. The inspectors reviewed applicable parts of four procedures and one exposure reduction plan to assess procedural and administrative guidance for ALARA activities.

The licensee's source term reduction program was evaluated through discussions with the chemistry supervisor and review of dose rate trends for primary side piping. Selected parts of a temporary shielding procedure and the outage shielding plan were assessed. The inspectors interviewed the Radiation Protection Manager and reviewed parts of a cobalt reduction plan, a valve specification, and a technical guide to evaluate the licensee's program for reduction of activated cobalt.

Historical dose data for collective exposure was reviewed from April 1999 through March 2002. The inspectors examined the dose record of a declared pregnant worker to evaluate gestation dose. Relevant parts of a dosimetry procedure were reviewed to assess licensee controls for declared pregnant workers. Documents reviewed are listed in the Attachment to this report.

The licensee's ALARA program was evaluated against the requirements of 10 CFR Part 20 and TS § 5.4.1, commitment to Regulatory Guide (RG) 1.33, Quality Assurance Program Requirements, as well as the guidance contained in RG 8.8, Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations will be As Low As Reasonably Achievable and RG 8.13, Instruction Concerning Prenatal Radiation Exposure.

Problem Identification and Resolution: Four CRs and one self-assessment associated with ALARA activities were reviewed and assessed. The inspectors evaluated the licensee's ability to identify, characterize, prioritize, and resolve the identified issues in accordance with AP FNP-O-AP-30, Preparation and Processing Condition Reports. In the case of CRs 2002002366 and 2002002399, the inspectors directly observed the specific events and followed the CR process from initial discovery to problem resolution. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.



## Cornerstone: Public Radiation Safety

2PS2 Radioactive Material Processing and Transportationa. Inspection Scope

Waste Processing and Characterization: During the weeks of September 16 and September 30, 2002, the configuration status and operability of selected radioactive waste (radwaste) processing systems and equipment were evaluated. Inspection activities included document review, direct inspection of processing equipment, and interviews with plant personnel.

The document review of the radwaste program included evaluation of guidance for waste classification, and procedures for clearing clean trash and processing spent resin. The inspectors reviewed the licensee's 10 CFR Part 61 contract laboratory sample gamma analysis results for the waste streams. The 2001 data were evaluated for consistency with the most current 10 CFR Part 61 sample data collected in 2002. The licensee's use of scaling factors for hard-to-detect nuclides was assessed for the primary resin waste stream. The inspectors reviewed the licensee's procedure for clearing clean trash from the RCA. The inspectors reviewed procedures for transferring and de-watering spent resin to ensure compliance with the process descriptions in the Process Control Program and the system diagrams in the UFSAR § 11. Documents reviewed are listed in the Attachment.

The direct inspection of radwaste equipment included walk-downs of resin lines, examination of abandoned equipment, observation of clean trash monitoring, observation of the Low Level Waste Storage Building and inspection of the Solidification Dewatering Facility.

Licensee personnel were interviewed regarding waste classification analyses and radwaste processing equipment. The inspectors assessed the individuals' knowledge of regulations, understanding of licensee procedures, and familiarity with radwaste systems. Waste stream sampling frequency, response to changing plant conditions, and laboratory counting techniques were discussed with waste shipping representatives.

The licensee's program for classifying and processing solid radwaste was evaluated against 10 CFR Part 61, the Branch Technical Position on Waste Classification and Waste Form January 1995, the Process Control Program, the UFSAR § 11, Radioactive Waste Management, and licensee procedures.

Transportation: The inspectors evaluated the licensee's activities related to transportation of radioactive material. The evaluation included document review and direct observation of shipping activities.

The documents reviewed included shipping procedures, records, and training specifications. The inspectors evaluated five shipping procedures for compliance with regulatory requirements. Records for five shipments, listed in the Attachment to this report, were reviewed for compliance with regulations and consistency with licensee procedures. Training records for five technicians qualified to ship radioactive material

were checked for completeness. In addition, training curricula provided to these workers were assessed. The inspectors discussed Department of Transportation shipping paper requirements and shipper training requirements with the Radioactive Material Control Supervisor.

During the week of September 16, 2002, the inspectors directly observed the preparation of pressurizer safety relief valves being transported as a Limited Quantity shipment. The inspectors assessed the technician's performance in completing the required paperwork via the RADMAN computer code and in conducting appropriate surveys of the loaded package.

Transportation program guidance and implementation were reviewed against regulations detailed in 10 CFR Part 71 and 49 CFR Parts 170-189, and licensee procedures. In addition, training activities were assessed against Subpart H of 49 CFR Part 172 and the guidance documented in NRC Bulletin 79-19.

Problem Identification and Resolution: Licensee CR reports and self-assessments associated with radwaste processing and transportation were reviewed. Five CRs and one self-assessment were reviewed and evaluated in detail and are listed in the Attachment to this report. The inspectors assessed the licensee's ability to identify, characterize, prioritize, and resolve the identified issues in accordance with licensee procedure FNP-0-AP-30, Preparation and Processing Condition Reports.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors sampled licensee submittals for the performance indicators (PIs) listed below for the period from April 2001 through March 2002. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Indicator Guideline," Rev. 2, and licensee procedure FNP-0-AP-54, Preparation and Review of NRC Performance Indicator Data, were used to verify the basis in reporting for each data element.

Reactor Safety Cornerstone

- Safety System Functional Failures
- Reactor Coolant System Activity
- Reactor Coolant System Leakage

To verify the accuracy of the third quarter of 2002 PI data submitted by the licensee, the inspectors reviewed portions of Unit 1 and Unit 2 Operator Logs for 2002, the daily morning reports including the daily CR descriptions, the monthly operating reports,

Licensee Event Reports (LERs), NRC Inspection Reports, and several Limiting Conditions for Operation. The inspectors also interviewed licensee personnel associated with the PI data collection, evaluation, and distribution.

#### Occupational Radiation Safety Cornerstone

- Occupational Exposure Control Effectiveness

The Occupational Exposure Control Effectiveness PI results were reviewed for the period January 2002 through August 2002. Monthly files were reviewed to determine whether the procedurally specified sources of information for the PI were collected each month and whether potential and PI occurrences were accurately assessed for reportability. Selected CRs issued during the review period and exposure event data documented were reviewed and assessed for potential PI reportability.

#### Public Radiation Safety Cornerstone

- Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual (RETS/ODCM)

The Radiological Effluent RETS/ODCM PI results were reviewed for the period January 2002 through August 2002. Monthly files regarding offsite doses were reviewed to determine whether the procedurally specified sources of information for the PI were collected each month and whether potential and PI occurrences were accurately assessed for reportability. Selected CRs, issued during the period under review, concerning potential PI occurrences were also assessed for reportability.

#### b. Findings

No findings of significance were identified.

#### 40A3 Event Follow-up

##### .1 (Closed) LER 50-348/2002-002-00: Manual Reactor Trip Due to Partially Dropped Control Rod

On October 15, Unit 1 was manually tripped when control rod F-6 dropped from 221 steps to 198 steps during a routine rod insertion of the D control bank. This event is further discussed in Section 1R14. The LER was reviewed by the inspectors and no findings of significance were identified. The licensee documented this condition in CR 2002002579

##### .2 Unit 1 C Service Water Pump Motor Failure

#### a. Inspection Scope

The inspectors reviewed the licensee's root cause analysis for the 1C SW pump motor failure that occurred on August 21, 2002, to determine if a performance deficiency existed.

b. Findings

Introduction: A Green self-revealing finding was identified for the licensee's failure to adequately monitor pump motor age which contributed to the failure of the 1C SW pump motor.

Description: On August 21, with the 1B and 1C SW pumps supplying the SW system, the 1C SW pump motor failed. The 1B SW pump maintained SW system pressure and flow. Unnecessary heat loads to the SW system were reduced to ensure adequate heat removal from critical components. The 1C SW pump motor was replaced and the 1C SW pump returned to service on August 22. This event was initially discussed in NRC Integrated Inspection Report 50-348, 364/2002-04.

The licensee's review identified that the motor's age was a contributor to the failure. The motor had been installed for 14 years exceeding the vendor recommendation of an overhaul every 10 years. The licensee scheduled the 1C pump motor for an overhaul in October 2002 based on a nine year inservice period between 1993 and 2002. The licensee's investigation following the motor failure found the motor was initially installed on the 1C SW pump in 1988. The motor had been removed in 1993 for overhaul; however, when the replacement motor began overheating the original motor was reinstalled on the 1C SW pump. Because the MWO did not specify that the same motor had been reinstalled on the 1C SW pump, the licensee failed to include the five year inservice period from 1988 to 1993 when scheduling the 1C SW pump motor overhaul.

Analysis: The deficiency associated with this finding is inadequate scheduling of vendor recommend maintenance which contributed to the failure of the 1C SW pump motor. This finding is greater than minor significance because it adversely impacted the ultimate heat sink reliability and effected the mitigating systems cornerstone objective. Because there was no loss of system function, this finding is of very low safety significance.

Enforcement: While the motor failure caused the 'A' train of SW to be inoperable, the train was returned to service within the allowed completion time in TS 3.7.8.A. Therefore, this finding did not constitute a violation of regulatory requirements. This finding is identified as Finding (FIN) 50-348/2002-005-01, Improper Scheduling of Pump Motor Overhaul. The licensee documented this condition in CR 2002001887.

40A5 Other Activities

Temporary Instruction (TI) 2515/148, Appendix A, Pre-inspection Audit for Interim Compensatory Measures (ICMs) at Nuclear Power Plants

a. Inspection Scope

The inspectors conducted an audit of the licensee's actions in response to a February 25, 2002, Order which required the licensee to implement certain interim security compensatory measures. The audit consisted of a broad-scope review of the licensee's actions in response to the Order in the areas of operations, security, emergency preparedness, and information technology as well as additional elements

prescribed by the TI. The inspectors selectively reviewed relevant documentation and procedures; directly observed equipment, personnel, and activities in progress; and discussed licensee actions with personnel responsible for development and implementation of the ICM actions. A more in-depth review of the licensee's implementation of the February 25, 2002, Order utilizing Appendix B and C of TI 2515/148 was conducted during the week of January 13, 2003. The results of this review will be documented in NRC Inspection Report 50-348/2003-03 and 50-463/2003-03.

The licensee's activities were reviewed against the requirements of the February 25, 2002, Order; the provisions of TI 2515/148, Appendix A; the licensee's response to the Order; and the provisions of the NRC-endorsed NEI Implementation Guidance, dated July 24, 2002.

b. Findings

During the audit, the inspectors were informed that on November 18, 2002, the licensee had identified a failure to comply with Provision B.2.a(1) of the February 25, 2002, Order. Although the licensee's responses to the Order dated March 18, May 10 and June 20, 2002, stated that this provision of the Order had been completed, the licensee had failed to make a determination related to certain resources, as required by the Order. At the time of the onsite inspection, the inspectors determined that the licensee had implemented adequate compensatory measures; had initiated actions to complete the determination and take any subsequent actions required by Provision B.2.a(2) of the Order; and was developing an amended response to the Order for submittal to the NRC. Pending further review, the failure to comply with Provision B.2.a(1) of the Order and 10 CFR 50.9 is being identified as an Unresolved Item (URI) 50-348, 364/2002-005-02, Failure to Comply with a Commission Order.

4OA6 Meetings including Exit

The inspectors presented the inspection results to Mr. Don Grissette, General Manager, and other members of licensee management on January 13, 2003. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

Attachment: Supplemental Information

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee personnel:

R. V. Badham, Administration Manager  
C. L. Buck, Chemistry/Health Physics Manager  
R. M. Coleman, Outage and Modification Manager  
C. D. Collins, Assistant General Manager - Plant Support  
K. C. Dyar, Security Manager  
D. E. Grissette, Plant General Manager  
J. R. Johnson, Assistant General Manager - Operations  
R. R. Martin, Engineering Support Manager  
B. L. Moore, Maintenance Manager  
C. D. Nesbitt, Training and Emergency Preparedness Manager  
W. D. Oldfield, Safety Audit Engineering Review Supervisor  
L. M. Stinson, Nuclear Support General Manager, Farley Project  
R. J. Vanderbye, Emergency Preparedness Coordinator  
T. Youngblood, Operations Manager  
P. Crone, Licensing Supervisor  
P. Harlos, Health Physics Superintendent  
T. Livingston, Chemistry Manager  
M. Mitchell, Health Physics Superintendent  
R. Wells, Operations Superintendent

#### NRC personnel:

B. Bonser, Chief, Division of Reactor Projects, Branch 2

### LIST OF ITEMS OPENED AND CLOSED

#### Opened

50-348, 364/2002-005-01	FIN	Improper Scheduling of Pump Motor Overhaul (Section 4OA3.3)
50-348, 364/2002-005-02	URI	Failure to Comply with a Commission Order (Section 4OA5.1)

#### Closed

50-348/2002-002-00	LER	Manual Reactor Trip Due to Partially Dropped Control Rod (Section 4OA3.1)
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## LIST OF DOCUMENTS REVIEWED

### **Section 1R04**

FNP-1(2)-SOP-7, RHR System  
 FNP-1(2)-AOP-12, Loss of Train A or B RHR System  
 RHR System Functional System Description (FSD) - A181002  
 FNP-0-SOP-38, EDG System  
 FNP-1(2)-ARP-0001, Main Control Board Annunciator Panel  
 FNP-1(2)-AOP-5, Loss of A or B Train Electrical Power  
 FNP-1(2)-AOP-5.1, Contingency Electrical Alignments  
 FNP-1(2)-AOP-5.2, Degraded Grid  
 WO 20003376  
 WO 2002933  
 FNP-0-SOP-38.1, Emergency Starting of the EDG System  
 FNP-0-SOP-24, Service Water System  
 FNP-0-SOP-43, EDG Building HVAC  
 FNP-0-SOP-61.3, Fire Protection - Low Pressure Carbon Dioxide System  
 FNP-0-SOP-42, EDG Fuel Oil Transfer System  
 Technical Specifications 3.8.1, 3.8.2, 3.7  
 UFSAR Section 8.3  
 FNP-0-ARP-19.1, Local EDG Control Panel Annunciator Panel  
 FNP-0-ARP-19.2, Local EDG Control Panel Annunciator Panel  
 FNP-0-STP-80 and 81 series, EDG Surveillances

### **Section 1R05**

Drawing A-508650 Sheet 14, Fire Zone Data Sheet, Aux Bldg EI 100'  
 Drawing A-508650 Sheet 12, Fire Zone Data Sheet, Aux Bldg EI 100'

### **Section 1R11**

FNP-1-ARP-0001, Main Control Board Annunciator Panel  
 FNP-1-ESP-0.1, Reactor Trip Recovery  
 FNP-1-ESP-1.1, SI Termination  
 FNP-1-EEP-0, Reactor Trip or SI  
 FNP-1-EEP-1, Loss Reactor or Secondary Coolant  
 FNP-1-EEP-2, Faulted Steam Generator Isolation  
 FNP-0-AP-30, Preparation and Processing of Condition Reports and Licensee Event Reports  
 FNP-0-TCP-17.5, License Administration  
 FNP-0-TCP-17.6, Simulator Training Evaluation/Documentation  
 FNP-0-TCP-17.22, Operator License Exam Security Administration  
 FNP-0-TCP-22.0, Test Development, Administration and Analysis

### **Section 1R14**

FNP-1-ARP-0001, Main Control Board Annunciator Panel  
 FNP-1-EEP-0, Reactor Trip or SI  
 FNP-1-ESP-0.1, Reactor Trip Recovery  
 CR 2002002529 and Root Cause Report  
 LER 2002-02, Manual Reactor Trip Due to Partially Dropped Control Rod  
 10 CFR50.72 Report of 10/16/02

FNP-1-AOP-13, Loss of Main Feed Water  
 CR 2002003001 and Root Cause Report  
 10 CFR50.72 Report of 12/10/02  
 FNP-1-UOP-1.3, Startup of Unit Following an at Power Reactor Trip

### **Section 1R20**

FNP-2-FHP-5.15, Spent Fuel Bridge Crane  
 FNP-2-SOP-7, Residual Heat Removal  
 FNP-2-SOP-54, SFP Cooling and Purification  
 FNP-2-AOP-12, RHR System Malfunction  
 FNP-2-AOP-42, Shutdown Core Cooling  
 FNP-2-AOP-43, Shutdown Power Availability  
 FNP-2-AOP-44, Shutdown Containment Control  
 FNP-2-AOP-45, Shutdown Inventory Control  
 FNP-2-AOP-46, Shutdown RCS Integrity  
 FNP-2-AOP-47, Shutdown SFP Cooling  
 Westinghouse Unit 2 Cycle 15 Core Reload Manual  
 FNP-2-STP-158, Reactor Coolant Check Valves Leakage Test  
 FNP-2-STP-16.12, Containment Spray Pumps Auto Start Test  
 FNP-0-ACP-47, Outage Implementation  
 FNP-0-AP-94, Outage Nuclear Safety  
 FNP-0-UOP-4.0, General Outage Operations Guideline  
 FNP-2-UOP-4.1, Refueling Outage Operation  
 FNP-2-UOP-4.3, Reduced Inventory and Midloop Operations  
 2R15 Outage Handbook  
 2R15 Significant Work Activities and Schedule  
 Outage Control Center Procedures  
 DCP 9637, Containment Cooler Level Monitoring System  
 DCP 9705, TDAFW Pump Monitoring and Testing System  
 2R15 Readiness Reviews  
 2R15 Critical Path and Safety Assessment Plan  
 2R15 Task Managers

### **Section 1R22**

FNP-2-STP-22.2 2B Auxiliary Feedwater Quarterly Inservice Test  
 FNP-2-IMP-209.25A, Motor Driven AFW Pump Discharge Pressure Loop Calibration  
 Drawing D-205007 Unit 2 AFW System

### **Section 2OS1**

Procedures, Instructions, Lesson Plans, and Manuals  
 Farley Nuclear Plant Radiation Control Procedure (FNP)-0-(RCP)-0.1, Key Control Program and Health Physics Guidance for High Radiation Areas, Radiological Exclusion Areas, and Very High Radiation Areas, Rev. 5  
 FNP-0-RCP-26, Radiological Surveys and Monitoring, Version 27  
 FNP-0-RCP-0, General Guidance and Special Instructions to Health Physics Personnel,  
 Version 48  
 FNP-0-RCP-190, Skin Dose Assessment Due to Contamination on Personnel Skin or Clothing,  
 Version 12



FNP-0-RCP-4, Refueling Survey, Version 16  
 FNP-0-AP-42, Access Control, Version 32  
 FNP-0-RCP-17, Radiological Controls for Divers, Rev. 16  
 Radiation Work Permits (RWPs)  
 RWP-2301, Health Physics Rover Watch In Containment  
 RWP-2705, Reactor Vessel Head Inspection  
 RWP-2501, Operations-Containment Routine  
 RWP-2451, Valves < 1Rem/Hr Containment and Auxiliary Building  
 RWP-2801, Routine Housekeeping  
 RWP-2783, Reactor Vessel Cavity Plan Inspection  
 Records and Data  
 Health Physics Hot Spot Log Summary, 07/08/02  
Condition Reports (CRs) and Self-Assessments  
 CR 2002002328, Personnel Contamination Dose Assessment, 09/27/2002  
 CR 2002001844, Failure to Log Out of RCA, 08/15/02  
 CR 2002001400, HP Assessment Findings, 07/01/02  
 CR 2002001829, HIS-20 Dosimetry Access System Failure, 08/13/02  
 Audit No. 2002-RAD/02, Audit of Radiological Protection and Radioactive Waste Management,  
 09/12/2002

## **Section 2OS2**

### Procedures, Instructions, Lesson Plans, and Manuals

FNP-0-RCP-14, ALARA Suggestions and Evaluations, Rev. 6  
 FNP-0-AP-90, ALARA Policy and Implementation, Rev. 3  
 FNP-0-RCP-7, Coordinated Exposure Reduction Program, Rev. 1  
 FNP-0-DOS-1, Personnel Monitoring, Rev. 38  
 FNP-0-RCP-15, Temporary Shielding, Rev. 33  
 FNP-2-MP-1.2, Reactor Vessel Lower Internals Removal and Installation, Rev. 10  
 FTG-G-001, Project Technical Guide For Supplemental Engineering Guidance, Rev. 4  
 Strategic Radiation Exposure Reduction Plan, Rev. 1  
 SN9501, ASME Section III, Gate, Globe, Check, Ball, and Butterfly Valves and Replacement  
 Valve Parts, Rev. 2  
 Cobalt Reduction Plan, Rev. 4

### Records

Individual Employee Access Records from June 4, 2002, to September 17, 2002 for Declared  
 Pregnant Worker  
 Minutes of ALARA Review Committee Meeting, June 26, 2002  
 Minutes of ALARA Review Committee Meeting, August 27, 2002

### Radiation Work Permits (RWPs)

RWP 002-2451, Valve work in U2 containment (valves <1R/hr)  
 RWP 002-2455, Thermal barrier HX work, 2B and 2C RCPs  
 RWP 002-2464, Lower internals lift & set  
 RWP 002-2465, Upper internals lift & set  
 RWP 002-2479, Pressurizer safety valve replacement

### Condition Reports (CRs) and Self-Assessments

CR 2001002097, Some personnel exhibit inappropriate radworker practices, 08/14/01  
 CR 2002002190, 100,000 DPM speck found on TLD beta window, 09/17/02  
 CR 2002002366, Leaking Tri-Nuclear filter bag, 10/01/02  
 CR 2002002399, Workers on wrong RWP in containment, 10/03/02  
 Health Physics and ALARA Human Performance Self-assessment, November 12 - 16, 2001  
 (reference CR 2002000030)

**Section 2PS2**Procedures, Instructions, Lesson Plans, and Manuals

FNP-0-RCP-56, Filter Change Guidelines Based on Radiation Levels, Rev. 7  
 FNP-0-RCP-800, Solidification and Dewatering, Rev. 13  
 FNP-0-RCP-805, Utilization of High Integrity Containers, Rev. 19  
 FNP-0-RCP-810, Shipment of Radioactive Waste, Version 39  
 FNP-0-RCP-811, Shipment of Radioactive Material, Version 26  
 FNP-0-RCP-812.0, General Guidance for Use of Radioactive Shipment Casks, Rev. 2  
 FNP-0-RCP-815, Radioactive Waste Handling, Rev. 12  
 FNP-0-RCP-817, Resin and Liquid Waste Accountability, Rev. 4  
 FNP-0-RCP-818, Prior Notification and Scheduling of Radioactive Material/Waste Shipments,  
 Rev. 6  
 FNP-0-RCP-820, Scaling Factor Utilization for Waste Classification, Rev. 10  
 FNP-0-RCP-839, Segregation of Low Level Solid Wastes, Rev. 6  
 FNP-0-RCP-845, Operation of the Solidification and Dewatering Facility, Rev. 13  
 FNP-0-RCP-888, Health Physics Radwaste Group Forms, Rev. 20

Records

Radwaste Shipment (RWS) 02-02, 14-55 Gal. Drums High Rad DAW Shipped 1/23/02  
 RWS02-06, RADLOC 500 Shipped 2/27/02  
 RWS02-02, RADLOC 500 Shipped 3/06/02  
 RWS02-02, HN 100 Liner Charcoal Shipped 7/23/02  
 RWS02-02, HN 100 Liner Resin Shipped 8/06/02

Training and Qualification Guides

Radioactive Waste Packing, Transportation, and Disposal Training 1/14-17/02

Condition Reports (CRs) and Self-Assessments

CR 2001000233, U2 SFP TriNuc filters were disposed of in U2 Drumming Room HIC Shield #4,  
 08/13/02  
 CR 2001000291, U1 WHT water rejected for release, 08/13/02  
 CR 2001000497, Revise rad waste procedure to insure vendor is notified to increase  
 polyelectrolyte, 07/31/01  
 CR 2001000513, U2 filter disposed in wrong storage/shipping container, 08/13/03  
 CR 2001000042, Several rad waste shipments sent to vendor contained partially filled aerosol  
 cans, 08/13/02  
 Audit No. 2002-RAD/02 Audit of Radiological Protection and Radioactive Waste Management  
 9/12/02  
 UFSAR Sections, License Amendments, Safety Evaluation Reports  
 Farley Nuclear Plant UFSAR, Chapter 11, Radioactive Waste Management, Rev. 16.

**Section 4OA1**Procedures

FNP-0-AP-54 Preparation and Reporting of NRC Performance Indicator Data 5/15/02

Records

Attachment 3 Health Physics Data Preparation June 2002, 07/02/02  
 Attachment 3 Health Physics Data Preparation August 2002, 09/05/02  
 Attachment 2 Chemistry PI Data Preparation May 2002, 07/02/02  
 Attachment 2 Chemistry PI Data Preparation August 2002, 09/06/02