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MEMORANDUM TO: Davis-Besse Oversight Panel

FROM: John A. Grobe, Chairman, Davis-Besse Oversight Panel

SUBJECT: MINUTES OF INTERNAL MEETING OF THE DAVIS-BESSE OVERSIGHT PANEL

The implementation of the IMC 0350 process for the Davis-Besse Nuclear Power Station was announced on April 29, 2002. An internal panel meeting was held on February 18, 2004. Attached for your information are the minutes from the internal meeting of the Davis-Besse Oversight Panel, RAM Closure Forms, Restart Checklist Item 2.a, Restart Checklist Item 5.c, C. Lipa/A. Mendiola memo re: Restart Commitments, Confirmatory Action Letter Issue Closure documents for Issues 3 and 4, and the "Open" Action Items List.

Attachments: As stated

cc w/att: D. Weaver, OEDO
J. Caldwell, RIII
G. Grant, RIII
S. Reynolds, DRP
B. Clayton, EICS
G. Wright, DRP
DB0350

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MEETING MINUTES: Internal IMC 0350 Oversight Panel Meeting
Davis-Besse Nuclear Power Station

DATE: February 18, 2004

TIME: 12:30 p.m. Central

ATTENDEES:

A. Mendiola	B. Ruland	J. Jacobson
C. Lipa	R. Baker	J. Stang
D. Passehl	J. Hopkins	S. Thomas

Agenda Items:

1. Discuss/Approve Today's Agenda

The Panel approved the agenda, but modified the order of presentations. **THE APPROVED AGENDA REFLECTS THE ORDER LISTED IN THESE MINUTES.**

2. Discuss Plant Status and Inspector Insights and Emergent Issues List

S. Thomas led a discussion on plant status and inspector insights and emergent issues. There are about 26 open Mode restraints which the licensee plans to complete by Friday, February 20, 2004. Also the plant is in TS Action Statements for planned work on the control room ventilation system and a containment spray pump.

There are 17 open operability evaluations. The resident staff is performing a detailed review of each operability evaluation for impact prior to restart.

NEW ACTION ITEM (248) - S. THOMAS TO BRIEF THE PANEL ON THE SIMILARITIES AND DIFFERENCES BETWEEN ELECTRICAL SYSTEM OPERABILITY EVALUATIONS OE 04-0005 AND OE 03-0009.

3. Discuss Restart Action Matrix Closure Forms

The Panel discussed Restart Action Matrix Items. **RESTART ACTION MATRIX ITEMS THAT THE PANEL APPROVED FOR CLOSURE ARE ATTACHED TO THESE MINUTES.**

NEW ACTION ITEM (249) - G. WRIGHT TO FOLLOW UP ON THE EFFECTIVENESS OF THE CORRECTIVE ACTIONS RELATED TO THE NOVEMBER 2003 EMPLOYEE CONCERNS PROGRAM SURVEY RESULTS AND THE LICENSEES LONG TERM SAFETY CULTURE MONITORING PROGRAM, INCLUDING MONTHLY PERFORMANCE INDICATORS.

NEW ACTION ITEM (250) - C. LIPA TO ENSURE THE ENHANCED INSPECTION PLAN INCLUDES COMMITMENTS LISTED IN RAM ITEM C-41.

NEW ACTION ITEM (251) - C. LIPA TO ENSURE THE ENHANCED INSPECTION PLAN INCLUDES A FOLLOWUP ON THE UHS SERVICE WATER CR RESOLUTION.

4. Discuss Restart Checklist Item 2.a

S. Thomas led a discussion of Restart Checklist Item 2.a, Reactor Pressure Vessel Head Replacement. S. Thomas presented a inspection results memorandum to J. Grobe. The Panel had several comments for incorporation into the memo. **A COPY OF THE APPROVED MEMO IS ATTACHED TO THESE MINUTES.**

5. Review of Outstanding Licensee Pre-Restart Commitments

A. Mendiola led a discussion on the review of outstanding licensee pre-restart commitments. A. Mendiola presented a memorandum to J. Grobe regarding review of Davis-Besse restart commitments. **A COPY OF THE APPROVED MEMO IS ATTACHED TO THESE MINUTES.**

6. Discuss Restart Allegation on Overtime Issue

S. Thomas led a discussion regarding an allegation on overtime and worker fatigue. The Panel has determined that no issues from this allegation exist that preclude restart. Closure of this allegation (RIII-04-A-005) will be addressed per the normal allegation process.

7. Discuss Restart Checklist Item 5.c

D. Passehl led a discussion on Restart Checklist Item 5.c, Operations Readiness for Restart. The Panel approved closure of this Checklist Item. **THE BASIS FOR CLOSURE OF RESTART CHECKLIST ITEM 5.c IS ATTACHED TO THESE MINUTES.**

8. Discuss Restart Authorization Memorandum

J. Grobe led a discussion on the Panel's restart authorization memorandum from J. Grobe to J. Dyer and J. Caldwell. Comments were collected for incorporation into the draft memorandum.

9. Discuss Confirmatory Action Letter Issue Closure

J. Jacobson led a discussion of the "Confirmatory Action Letter Issue Closure" enclosure to the Restart Authorization Letter. Comments were provided to J. Jacobson and M. Phillips for review.

The Panel discussed and approved the closure of Confirmatory Action Letter Issue 3 on December 9, 2003. **A COPY OF THIS CAL ISSUE 3 AND THE BASIS FOR ITS CLOSURE IS ATTACHED.**

The Panel discussed and approved the closure of Confirmatory Action Letter Issue 4. **A COPY OF THIS CAL ISSUE 4 AND THE BASIS FOR ITS CLOSURE IS ATTACHED.**

Regarding Confirmatory Action Letter Issue 5, the Panel decided this item will be closed upon issuance of the restart approval letter to the licensee if restart is authorized.

10. Discuss Key Documents

B. Ruland led a discussion of key documents.

11. Discuss/Update Milestones and Commitments

The Panel reviewed and discussed upcoming milestones and commitments.

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RAM Items Approved for Closure

RAM Item No. - C-04 **Closed: Y**

Description of Issue: How is soft issue of "people performance" addressed via defense in depth; i.e., Management's oversight of supervisors, supervisors oversight of workers, and quality assurance's oversight of the entire process.

Description of Resolution: People performance, beyond normal performance measures, is being addressed by the licensee's Manager/supervisor observation program. The program has an administrator who monitors numbers of observations and results from the observations. Metrics are used to track both number of observations and whether the observations resulted in an action. Further, the Safety Conscious Work Environment Review Team (SCWERT) is monitoring actions taken for poor performance to ensure the actions are warranted and appropriate, along with assessing the impact on the organization from the proposed action. The Management & Human Performance (M&HP) team reviewed both the SCWERT and management observations program during our inspection. The corrective action program input threshold has been significantly reduced to capture lower level issues including human performance type failures.

Site evaluations and surveys continue to monitor the people contribution to overall site performance and performance indicators are monitored regarding error rates. A better defined set of performance indicators/metrics is being developed to be monitored monthly; however, the final version of the program was not available to the team for review. This RAM item is closed

Reference Material - IR 2003-12

RAM Item No. - C-19 **Closed: Y**

Description of Issue - Can Technical Specification (TS) 4.5.2.h be met by performing the test at one pressure and then correlating it to the TS pressure value to verify TS flow rate value is achieved?

Description of Resolution - In response to this concern, the licensee requested a change to the TS consistent with Standard Improved TS. The requested change removed the specific test requirements from the TS to the Technical Requirements Manual. The NRC staff approved the TS change by license amendment dated August 12, 2003. Therefore, this item is closed.

Reference Material - License amendment no. 256 dated August 12, 2003 (ADAMS ML031830237)

RAM Item No. - C-39 **Closed: Y**

Description of Issue - Requests for Issues: Ensure Sufficient Observations of Complex Control Room Evolutions to Provide Effective Assessment of Conduct of Operations

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Description of Resolution - The Restart Readiness Assessment Team Inspections included extended shift inspection of complex control room evolutions, as did the resident inspection staff during Mode changes in December 2003 and January 2004. The restart readiness assessment team inspections concluded that specific problem areas and issues observed during the first restart readiness assessment team inspection, such as pre-job briefings, control room team work, shift turnover, self-checking and procedural use and adherence had been adequately resolved, and that corrective actions for deficiencies involving configuration control were acceptable. Around-the-clock observations of complex control room evolutions were observed by the restart readiness assessment team and resident inspectors. No significant problems were observed during these observations.

Region III issued an inspection plan and the resident inspectors conducted expanded coverage to observe plant activities before entry into Mode 4 last December 2003 and through the Christmas weekend. In addition, in early January 2004, the licensee commenced a reactor plant cooldown from Mode 3 to Mode 4 which was observed by the resident inspection staff. The resident staff observed the performance of the cooldown from approximately 533°F until entry into Mode 4 and identified no significant personnel or equipment challenges were observed.

Reference Material - Memorandum, R. Skokowski to J. Grobe, February 6, 2004; NRC Inspection Report Nos. 50-346/04-04, 04-02, 03-25 (ADAMS Accession No. ML040290768) and 03-11 (ADAMS Accession No. ML040360097).

RAM Item No. - C-41 **Closed: Y**

Description of Issue -Document review of licensee's Operational Improvement Plan for operating cycle 14 and subsequent CATI recommendations and comments for required actions prior to restart.

Description of Resolution - The Operational Improvement Plan listed licensee's proposed and planned improvements in various areas including quality of engineering products, human performance and corrective action program. Overall, the plan appears to include appropriate engineering and corrective action related initiatives that should address problem areas identified by the CATI.

Based on a review of the Davis-Besse Operational Improvement Plan (OIP) for Operating Cycle 14, dated December 26, 2003, the following items were identified by the CATI for further consideration:

11. Ask licensee to provide the NRC periodic inside and outside independent assessment reports and performance indicators for the ongoing initiatives so that we can assess/monitor effectiveness and level of success.

    Resolution: The Panel is developing an Order to require independent assessments in areas including engineering and corrective action. The licensee will be required to submit those assessment plans and results to the NRC. In addition, expanded

engineering inspection effort will periodically evaluate licensee internal assessments. The Panel will periodically conduct public meetings to discuss licensee performance.

12. Issue a Confirmatory Order to include specific conditions and expectations.

    Resolution: See Item 1 above.

13. Have periodic meetings with the licensee to determine status of initiatives and licensee's management involvement and commitments.

    Resolution: See Item 1 above.

14. Designate an Engineering lead inspector for Davis-Besse to follow up on the ongoing engineering initiatives and to monitor progress and ensure engineering products and performance are improving. Individual could follow up in the inspectable areas and discuss with the licensee progress in the implementation of the OIP, while considering the comments provided in this document.

    Resolution: A lead engineering inspector has been assigned to the Davis-Besse Station. That individual will conduct regular assessments of licensee engineering performance and the effectiveness of improvement initiatives. That inspector will be involved in the planning or conduct of major NRC engineering inspections at Davis-Besse.

15. Consider conducting a mini CATI (corrective action and engineering products) in about 6-9 months.

    Resolution: The frequency of the problem identification and resolution inspection (PI&R) has been increased from once every two years to annual and also the size of the team has been increased. In addition, the number of regular annual PI&R samples has been doubled. Engineering modifications and safety evaluation inspections will be conducted in the fall of 2004.

6. Consider revising the goal for licensee performance indicator I-12 from $\leq$ 5% to 0 %.

    Resolution: Routine inspection will include evaluation of the effectiveness of the performance indicators, including the necessity for adjustment of performance indicator goals.

The following areas will be considered for inspection focus in evaluating effectiveness of corrective actions:

1. Evaluate engineering knowledge of design and licensing basis of the plant.

2. Evaluate continuing effectiveness of training of plant engineering staff members on the various changes to the corrective action process and revised procedures for generating engineering products.

3. Evaluate engineering procedure quality and adherence.

4. Evaluate the adequacy of independent engineering product reviewers and the effectiveness of the Engineering Assurance Board.

5. Evaluate adequacy of NQA assessments of the effectiveness of corrective actions including the Engineering Assurance Board.

6. Periodically evaluate the insights provided by the licensee's performance indicators (PIs) in the engineering and corrective action areas, ensure appropriate actions are taken for areas of weakness identified through the PIs, and adjustments made to the performance indicators are appropriate.

RAM Item No. - CAL-04 **Closed: Y**

Description of Issue - Obtain NRC review and approval of the repair or modification and testing plans for the existing RPV head, prior to implementation of those activities. Prior to restart of the reactor, obtain NRC review and approval of any modification and testing activity related to the reactor core or reactivity control systems. If the reactor vessel head is replaced in lieu of repair or modification, the replacement must comply with appropriate Commission rules and industry requirements.

Restart Checklist Item: 7.a

Description of Resolution - NRC Inspection Report 50-346/02-07 (ADAMS Accession No. ml023370100) documented review of the non-destructive examinations performed at the Midland Michigan site on the replacement head and the American Society of Mechanical Engineers (ASME) Code data packages for the replacement head. Based on this inspection, NRC verified that the replacement head was designed and fabricated in conformance with ASME Code requirements and that the original ASME Code Section III N-stamp remained valid. This inspection also reviewed activities associated with the temporary containment access opening and restoration. NRC Inspection Report 50-346/03-05 (ADAMS Accession No. ml032230339) documented NRC review of the containment integrated leak rate test. This inspection concluded that containment integrity had been restored following replacement of the reactor head.

Leakage testing of the replacement head was evaluated in NRC Inspection Report 50-346/03-23 (ADAMS Accession No. ml033421074) and found acceptable. Inspection Report 50-346/04-02 will document inspection of DB-SC-03270, "Control Rod Assembly Insertion Time Test." This activity was observed to evaluate proper control rod movement and alignment. This test was successfully completed on February 10, 2003. The inspection report is scheduled to be issued by the middle of March 2004.

Reference Material - NRC Inspection Report Nos. 50-346/02-07 (ADAMS Accession No. ml023370100), 50-346/03-23 (ADAMS Accession No. ml033421074), and 50-346/04-02.

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RAM Item No. - CAL-05 **Closed: Y**

Description of Issue - Prior to the restart of the unit, meet with the NRC to obtain restart approval. During that meeting, we expect you will discuss your root cause determination, extent of condition evaluations, and corrective actions completed and planned to repair the damage and prevent recurrence.

Restart Checklist Item: 7.a

Description of Resolution - To support the request to restart the Davis-Besse Station, the licensee submitted its "Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station" to the NRC on November 23, 2003. The report was updated by a submittal dated February 6, 2004. The licensee met with NRC management on February 12, 2004 to request approval for restart of the Davis-Besse Station. The licensee summarized completion of their Return to Service Plan, including root cause determination, extent of condition, and corrective actions taken to prevent recurrence. Upon submittal of the "Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station" and presentation at the February 12, 2004, meeting, the licensee completed its actions to close this item.

The Panel concluded this item will be documented in the CAL Closure Letter, Enclosure 1 of the Restart Approval Letter, and considered closed upon issuance of the Restart Approval Letter.

Reference Material - Licensee presentation dated 2/12/2004 (ML0404302200), Integrated Readiness to Support Restart Report, dated November 23, 2003 (ADAMS Accession No. ml033360251), Supplemental Update to the Integrated Readiness to Support Restart Report, dated February 6, 2004 (ADAMS Accession No. ml040420223), and CAL Closure Letter, Enclosure 1 of the Restart Approval Letter.

RAM Item No. - LER-11 **Closed: Y**

Description of Issue - Potential Degradation of High Pressure Injection Pumps Due to Debris in Emergency Sump Fluid Post Accident

Description of Resolution - LER 2003-002-00, and Supplement 1, dated 1/29/04 described corrective actions taken and presented the licensee's risk significance determination. Corrective actions included analysis, HPI pump modifications, qualification testing, in-plant testing, and removal of fibrous material from containment. NRR reviewed the overall approach to the modification of the high pressure injection pumps and concluded that the modification was acceptable and provided reasonable assurance that the HPI pumps will perform their required functions when called upon (TIA 2003-04, dated 02/11/04). Results of NRC's final significance determination will be documented in Inspection Report 05000346/2004005.

Reference Material - LER 2003-002-00; LER 2003-002-01, dated 1/29/2004; Task Interface Agreement 2003-04; Inspection Report 50-346/04-06.

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RAM Item No. - NCV-12 **Closed: Y**

Description of Issue - The 2002 SSDI identified a Green finding and NCV of 10 CFR Part 50, Appendix B, regarding the licensee's failure to adequately correct the SW pump discharge check valve acceptance criteria in the test procedure.

Description of Resolution -The original concern that resulted in the NCV was that the test procedure acceptance criteria reflected 10,000 gpm flow when the USAR reflected system performance flow of 10,250 gpm. This concern was entered into the licensee's corrective action system as CR 02-07657. The team determined that this CR was closed based on a non-documented calculation which showed that the valves would be wide open at flow rates greater than 7270 gpm. The inspectors reviewed the NCV and identified two issues. First, the test acceptance criteria of the procedure still did not match the value contained in the USAR. The second issue related to the licensee utilizing a non-documented calculation to justify not meeting the check valve acceptance criteria when the system was tested.

Regarding the first issue, the inspectors concluded that a violation of 10 CFR Part 50, Appendix B existed because of the inadequate acceptance criteria. The inspectors concluded that the minor discrepancy between the USAR value and the acceptance criteria was of very low safety significance and not a concern for restart.

Regarding the second issue, the inspector noted that a test of the system resulted in a flow rate of 9,718 gpm. The inspectors concluded that given the flow rate developed and the pressure achieved, there was reasonable assurance that the check valve was full open at the obtained flow rate of 9,718 gpm. The licensee developed an operability evaluation regarding the discrepancies in the service water system. That operability evaluation was reviewed by the resident inspection staff and documented in Inspection Report No. 50-346/03-25. Consequently, the inspectors concluded that the NCV was not a concern for restart.

Reference Material - NRC Inspection Report No. 50-346/03-10 (ADAMS Accession No. ml040680070) and 50-346/03-25 (ADAMS Accession No. ml040290768).

RAM Item No. - NCV-32 **Closed: Y**

Restart Checklist Item - 5.d

Description of Issue - Requests for Issues: Failure to Verify Adequacy of Short Circuit Protection for Direct Current Circuits. While reviewing condition reports and calculation, the team questioned the adequacy of DC circuit protection for long DC circuits. Subsequently, the licensee evaluated the adequacy of the fuse sizing and identified that, in the case of short circuits, the circuit resistance could be high enough to preclude operation of the fuses protecting circuits. Thus, a short circuit current could be allowed to flow for an indeterminate length of time.

Description of Resolution - The licensee issued CR 03-06944 to document the deficient circuit protection for valves having long circuit lengths. The licensee developed an engineering

package to replace the fuses in March 2004. The inspectors reviewed the licensee's engineering package and concluded that the projected completion date appears reasonable and commensurate with the safety significance of the issue. The inspectors concluded that this approach was acceptable and does not represent a restart constraint.

A NCV of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," having very low safety significance (Green) was issued in NRC Inspection Report 50-346/03-10.

Reference Material - NRC Inspection Report No. 50-346/03-10, (ADAMS Accession No. ml040680070).

RAM Item No. - NCV-33 **Closed: Y**

Restart Checklist Item - 5.d

Description of Issue - Requests for Issues: Lack of Calculations to Ensure Minimum Voltage Availability at Device Terminals.

Description of Resolution - As a part of CR 01-03059, the licensee performed an extent of condition evaluation and identified that calculation C-EE-002.01-010 evaluated available DC voltage to the panel terminals only. The calculation did not confirm sufficient voltage at device terminals for proper operation. The licensee issued CR 02-00412 to document this deficiency. In response to this CR, the licensee issued a revision to the calculation.

The team identified deficiencies in calculation C-EE-002.01-010 regarding voltage drop in parts of the circuits. The licensee issued CR 03-06956 and performed additional analysis and extent of condition reviews. The licensee determined that there were no operability issues based on the results of the re-analysis. The team reviewed these re-analysis and concluded there is reasonable assurance that the affected components are operable. The team has no concerns regarding this item for restart.

An NCV of 10 CFR Part 50, Appendix B, Criterion III, having very low safety significance (Green) was issued in NRC Inspection Report 50-346/03-10.

Reference Material - NRC Inspection Report No. 50-346/03-10, (ADAMS Accession No. ml040680070).

RAM Item No. -SUP-11 **Closed: Y**

Description of Issue: Corrective Actions: Determine that quantitative or qualitative measures of success have been developed for determining the effectiveness of the corrective actions to prevent recurrence.

Description of Resolution - The licensee has developed a number of monitoring tools to assess the effectiveness of their corrective actions in the management and human performance (M&HP) area. The tools include surveys conducted by Quality Assurance and Employee Concern Program, and the Restart Readiness Review business practice (which is also being turned into a FENOC business practice to be implemented at least every two years). The

surveys provide direct feedback from the staff and the restart readiness review process provides an integrated assessment of performance in the M&HP arena. The M&HP team reviewed the tools and determined that they were acceptable. These items were reviewed during M&HP Phase 3 inspection. The inspection confirmed that both quantitative and qualitative measures have been developed for monitoring the effectiveness of corrective actions in the management and human performance area. This RAM item is closed.

Reference Material: NRC Inspection Report No. 50-346/03-012 (ADAMS Accession No. ml040580673).

RAM Item No. -SUP-19 **Closed: Y**

Description of Issue: Review of Licensee Control System for Identifying, Assessing, and Correcting Performance Deficiencies: By reviewing selected aspects of the employee concerns program, ensure that employees are not hesitant to raise safety concerns and that safety significant concerns entered into the employee concern program receive an appropriate level of attention.

Description of Resolution: The Management & Human Performance (M&HP) team conducted extensive review of all cases entered into the employee concern program in 2003. The team concluded that the program (started in early 2003) was a significant improvement over the previous ombudsman program. The team also monitored results for surveys which ask questions regarding individual willingness to raise concerns. Both measures indicated that ~95% of individual reported that they understood that it was the responsibility and obligation to raise issues they believed to be safety significant. Individuals' understanding of this responsibility and obligation was independently verified by the M&HP Team through interviews. In this context "raise" indicates to any of the licensee's systems - e.g., management, corrective action program, employee concerns program (ECP). This RAM item is closed

Reference Material: IR 2003-012 & 2004-003

RAM Item No. - SUP-30 **Closed: Y**

Description of Issue - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Design: Assess the effectiveness of corrective actions for deficiencies involving design.

Description of Resolution -The Corrective Action Team Inspection (CATI) was intended to assess the effectiveness of the licensee's actions to identify the deficiencies, evaluate the cause(s) and correct the problems in order to prevent recurrence. In order to make the above assessment, the team selected approximately 200 CRs which evaluated the licensee's actions to address deficiencies documented in licensee event reports (LERs), NRC Non-Cited Violations (NCVs), and NRC unresolved items (URIs) from previous inspections. The selected CRs also involved issues identified by the licensee as part of their system health readiness or latent issue reviews. The team's focus was on CRs which the licensee had identified as

requiring resolution prior to the restart of the plant, with a further emphasis on those CRs which the licensee had determined to be "significant conditions adverse to quality (SCAQ)." The team specifically assessed the licensee's CAP in four separate areas:

- Identifying problems; including recognizing performance issues within the CAP itself;
- Categorizing and prioritizing problems, with a specific emphasis on the licensee's use of a process termed as "rollovers";
- Evaluating those problems; including assessing root and apparent causes, extent of conditions, operability and reportability;
- Correcting problems, including not only the originally identified problem but any issues identified as part of the evaluation, assessing the effectiveness of the corrective actions and actions taken to prevent recurrence.

In addition, the team assessed two areas where a number of problems were identified. These were :

- Engineering Resolution of Design Deficiencies and
- Procedure Quality and Adherence

Based on the team's review of these areas, the intent of this supplemental inspection area was covered.

Reference Material - NRC Inspection Report 50-346/03-10, (ADAMS Accession No. ml040680070).

RAM Item No. - SUP-34 **Closed: Y**

Description of Issue: Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Human Performance: Assess the effectiveness of corrective action for deficiencies involving human performance.

Description of Resolution: The Management & Human Performance (M&HP) team assessed the effectiveness of the licensee's corrective action to the deficiencies identified in the licensee's Management & Human Performance Root Cause Analyses. The team believes that continued attention and emphasis on basic safety conscious work environment concepts is necessary to continue the improvement in safety culture. The team has concluded that the corrective actions implemented to date, addressing the licensees Management & Human Performance Root Cause analyses, have been sufficiently effective to allow closure of restart checklist item 4.b. This RAM item is closed.

Reference Material: IR 2004-03

RAM Item No. - SUP-35 **Closed: Y**

Description of Issue - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Human Performance: Review specific problem areas and

issues identified by inspections to determine if concerns exist in organizational practices such as pre-job briefings, control room team work, shift turnover, self-checking and procedural use and adherence.

Description of Resolution - The restart readiness assessment team inspections concluded that systems were operated consistent with the design and licensing documents, that specific problem areas and issues observed during the first restart readiness assessment team inspection, such as pre-job briefings, control room team work, shift turnover, self-checking and procedural use and adherence had been adequately resolved, and that corrective actions for deficiencies involving configuration control were acceptable. Around-the-clock observations of complex control room evolutions were observed by the restart readiness assessment team and the resident inspectors. No significant problems were observed during these observations. This item is considered closed for restart.

Reference Material - Memorandum, R. Skokowski to J. Grobe, February 6, 2004; Inspection Report 50-346/04-04.

RAM Item No. - URI-10 **Closed: Y**

Description of Issue - Completeness and accuracy of information. In the AIT report questions were raised regarding completeness and accuracy of documents either required by the USNRC to be maintained by the licensee or submitted to the USNRC.

Description of Resolution - NRC Inspection Report 03-19 reviewed the licensee's actions to resolve Restart Checklist Item No. 3.i., associated with the completeness and accuracy of required records and submittals to the NRC. The purpose of the inspection was for the NRC to determine whether reasonable confidence exists that important docketed information is complete and accurate in all material respects and that the licensee has taken appropriate corrective actions to ensure that future regulatory submittals are complete and accurate.

The inspection confirmed that the licensee has taken appropriate corrective actions to ensure that future regulatory submittals are complete and accurate in all material respects. The procedures for regulatory submittals have been revised to ensure that submittals are properly validated before issuance. Site personnel, including the site supervisory personnel, have been given training to ensure that they are cognizant of the requirements of 10 CFR 50.9 and the implications of not complying with those requirements. New supervisory training includes management responsibilities related to completeness and accuracy. New employee training includes the requirements of 10 CFR 50.9 as part of the orientation.

The inspection disclosed one particularly risk significant example regarding the licensee's response to Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant-Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment." As indicated in the Inspection Report, the licensee identified several corrective actions (CAs) as a result of this issue that have been completed which are:

- Update the response to Generic Letter 98-04 (Complete - CA 02-03-1718). The licensee's submitted a revised response to Generic Letter 98-04 on November 26, 2003 (ML033370836).
- Revise the UFSAR (Complete - CA 03-03-01718)
- Institute a Nuclear Safety-Related Protective Coatings Program (Complete - CA 02-02-03857)
- Institute an inventory of all non-Design Basis Accident (DBA) qualified coating materials (Complete - CA 04-02-02437)
- Removal and re-coating of Core Flood Tanks with DBA-qualified coating material (Complete - CA 03-02-03609)
- Removal and re-coating of Service Water piping with DBA-qualified coating material (Complete - CA 06-02-02108)
- Removal and re-coating of Reactor Vessel Head Service Structure with DBA-qualified coating material (Complete - CA 03-02-03609)

The completeness and accuracy inspection identified no widespread noncompliances of regulatory requirements or current programmatic concerns associated with the completeness and accuracy of submittals to the NRC. Based on the documents and corrective actions reviewed during this inspection and the results of previous NRC inspections of licensee activities under the Davis-Besse Return-to-Service Plan, the NRC has reasonable confidence that important docketed information is complete and accurate in all material respects and that future submittals will be complete and accurate.

The issue of the licensee providing complete and accurate information is closed for restart.

Reference Material - Inspection Report No. 50-346/02-08 and Inspection Report No. 50-346/03-19 and Inspection Report No. 50-346/02-03.

RAM Item No. - URI-16 and URI-34 **Closed: Y**

Description of Issue - URI-16, Lifting of Service Water Relief Valves, URI-34, Repetitive Failures of Service Water Relief Valves.

Description of Resolution - The issue dealt with a continuing operating condition where the relief valves on the tube (SW) side of the CCW heat exchangers would open during pump swap overs under low flow conditions such as winter operation with low heat loads. The frequent opening caused the valves to fail at an undesirable rate. The licensee had resolved the problem of inadvertent openings by changing the operating procedures. The inspectors verified that the valves were appropriately sized and set up correctly for the application. The reduction

in inadvertent openings also resulted in a reduction of valve failures. The team concluded that the corrective actions implemented were reasonable to resolve this issue and there are no restart constraints. The team also concluded that there were no violations so the unresolved items are closed.

Reference Material - NRC Inspection Report No. 50-346/03-10 (ADAMS Accession No. ml040680070).

RAM Item No. - URI-24 **Closed: Y**

Description of Issue - Requests for Issues: During the SSDI inspection in 2002, the team identified an issue with the ability of the HPI pumps to perform as intended during extended operation on minimum flow. (URI-24).

Description of Resolution - The design requirements for the HPI system include the ability of the system to function at 35 gpm minimum flow. The licensee performed a six-hour test run on one of the pumps using the originally-installed minimum flow recirculation line and could not achieve flow rates below 53 gpm. On February 8, 2004, the licensee completed Operability Evaluation 04-004, Revision 1, which concluded that the HPI pumps were operable.

Based upon observed pump and system conditions during the test, the licensee concluded that the pump would remain operable at or near that flow. Due to the size of the installed orifice in the line, the inspectors concluded that it was reasonable that the pump would not experience flows much below that value and, in fact, the lowest obtained, recorded value noted for either pump during a review of surveillance tests conducted between June 2001 and December 2003 was 49 gpm. Also, based upon observed pump and system conditions during the six hour test run and feedback from the pump vendor, the licensee concluded the pumps would be able to run at minimum flow for extended periods of time during the designated mission time of 30 days post-accident. The inspectors agreed with the licensee's determination that the pumps would be able to perform their safety function. Further, the licensee planned several procedure changes to ensure actions would not be taken in the future that would reduce the minimum flow rate observed during the six hour test.

A NCV of 10 CFR Part 50, Appendix B, Criterion III, having very low safety significance (Green) was issued since the licensee had previously failed since initial plant startup to verify that the HPI pumps could operate under design basis minimum flow requirements. The inspectors have no restart concerns regarding this issue.

Reference Material - NRC Inspection Report 50-346/03-10 (ADAMS Accession No. ml040680070).

RAM Item No. - URI-29 **Closed: Y**

Description of Issue - The licensee failed to perform a valid service water pump net positive suction head analysis, specifically the licensee's calculations determined that under a certain

combination of design basis conditions pump net positive suction head (NPSH) was not achievable.

Description of Resolution - The licensee entered the issue into its corrective action program and performed the necessary calculations. The team reviewed these calculations and determined that there was one case where there was insufficient NPSH. The licensee initiated CR 03-03977 to revise the calculations. Following evaluation of CR 03-03977, the licensee concluded that the service water system is able to perform its safety-related function. The team agreed with the licensee's conclusions. The team also concluded that there were no related constraints for restart.

A NCV of 10 CFR Part 50, Appendix B, Criterion III, having very low safety significance (Green) was issued.

Reference Material - NRC Inspection Report 50-346/03-10 (ADAMS Accession No. ml040680070).

RAM Item No. - URI-32 **Closed: Y**

Description of Issue - During the 2002 SSDI, the NRC identified that the service water flow balance test procedure did not establish flows to the safety-related heat exchangers based on worst-case design basis conditions, such as degraded SW pumps, lowest UHS level, highest resistance SW system lineup, or system resistance degradation. Further, no analyses existed that established the test acceptance criteria for design basis conditions. This URI was written to document concerns with the flow balance testing for the SW system.

Description of Resolution - Following discovery, the licensee placed the issue in its corrective action program, evaluated it, and put procedures in place to address the issue. The licensee performed a service water flow balance test using revised procedures late in the outage. The results of the test were reviewed by the resident inspectors and the results documented in inspection report 50-346/03-25. The inspectors determined that the test was appropriately performed and the results met their design margin. The inspectors concluded that there were no constraints for restart.

A NCV of 10 CFR Part 50, Appendix B, Criterion XI, having very low safety significance (Green) was issued.

Reference Material - NRC Inspection Report Numbers 50-346/03-25 (ADAMS Accession No. ml040290768) and 50-346/03-10 (ADAMS Accession No. ml040680070).

RAM Item No. -URI-43 **Closed: Y**

Description of Issue - Final Evaluation of LER 50-346/2002-006-00. See also CR 02-5590 [EDG Exhaust]. Specifically, this item involves resolution of six feet of EDG exhaust stacks which were unprotected against tornado missiles and that portions of a concrete barrier were degraded.

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Description of Resolution - The team determined that the licensee had evaluated the non-conforming conditions using a computer code (TORMIS) discussed in Electric Power Research Institute (EPRI) Topical Report NP-2005, "Tornado Missile Risk Evaluation Methodology," Volumes I and II, August 1981. Based on use of this code, the licensee determined the probability of the unprotected areas being struck by a tornado missile was low.

The licensee revised the USAR to incorporate the TORMIS methodology, including a provision which allowed it to be used to evaluate tornado missel and wind loading conditions. Utilizing the TORMIS methodology, the licensee determined that no modifications were necessary to the diesel generator stacks and determined that the diesel generators were operable. Further, the licensee identified that repairs were necessary to other degraded components. The licensee physically repaired the degraded concrete to restore its tornado protection capability.

As part of the USAR change, the licensee performed an evaluation as required by 10 CFR 50.59. During inspector review of this evaluation, the team questioned whether the licensee had appropriately followed the guidance in Nuclear Energy Institute standard NEI 96-07, which NRC endorsed in Regulatory Guide 1.187. The licensee acknowledged that sufficient detail was not provided in its 10 CFR 50.59 evaluation to support the conclusions in the evaluation. The licensee initiated condition report 03-06561 to address the deficiency in the 50.59 evaluation.

The team analyzed this issue and determined that it was of very low safety significance, and concluded that this was not a restart constraint. The team identified a NCV of 10 CFR 50.59, "Changes, Tests and Experiments," having very low safety significance.

Reference Material - NRC Inspection Report 50-346/03-10, (ADAMS Accession No. ml040680070).

RAM Item No. - URI-44 **Closed: Y**

Description of Issue - Potential Inability for HPI Pumps to Perform Safety Related Function (see LER 03-02)

Description of Resolution - LER 2003-002-00, and Supplement 1, dated 1/29/04 described corrective actions taken and presented the licensee's risk significance determination. Corrective actions included analysis, HPI pump modifications, qualification testing, in-plant testing, and removal of fibrous material from containment. NRR reviewed the overall approach to the modification of the high pressure injection pumps and concluded that the modification was acceptable and provided reasonable assurance that the HPI pumps will perform their required functions when called upon (TIA 2003-04, dated 2/11/04). Results of NRC's final significance determination will be documented in Inspection Report 05000346/2004005.

Reference Material - LER 2003-002-00; LER 2003-002-01, dated 1/29/2004; Task Interface Agreement 2003-04; Inspection Report 50-346/04-06.

ATTACHMENT

February 18, 2004

MEMORANDUM TO: John A. Grobe, Chairman, Davis-Besse Oversight Panel

FROM: Scott Thomas, SRI, Davis-Besse Nuclear Power Station

SUBJECT: RESTART CHECKLIST ITEM 2.a CLOSURE RECOMMENDATION

The purpose of this memorandum is to recommend the closure of Restart Checklist Item 2.a [Reactor Pressure Vessel Head Replacement].

Several inspections were conducted to evaluate licensee activities associated with the replacement of the reactor vessel pressure head at the Davis-Besse Station. Using approved special inspection plans and Inspection Procedure 71007, "Reactor Vessel Head Replacement Inspection," as guidance, the inspectors assessed licensee performance in the following areas: design and planning/reactor vessel head inspection; reactor vessel removal and replacement; containment vessel restoration; and post installation testing. Specific inspection activities were documented in the following inspection reports: 05000346/2002007; 05000346/2002010; 05000346/2003005; 05000346/2003017; and 05000346/2003023. Based on results of these inspections, sufficient inspection activities were completed to provide reasonable assurance that Restart Checklist Item 2.a can be closed, with the exception of the observance of control rod drive insertion testing.

The inspectors observed the performance of surveillance test procedure DB-SC-03270, "Control Rod Assembly Insertion Time Test," Revision 03, on February 10, 2004. The surveillance was completed successfully and all acceptance criteria were satisfied. No findings of significance were identified by the inspectors. This inspection activity will be documented in the Integrated Inspection Report 05000346/2004002.

This memorandum serves to document the recommendation for closure of Restart Checklist Item 2.a, "Reactor Pressure Vessel Head Replacement." The details supporting closure of Restart Checklist Item 2.a will be documented in Integrated Inspection Report 05000346/2004002.

CONTACT: Scott Thomas, SRI, Davis-Besse
(419) 244-4494

/RA C. Lipa for C. Thomas via tel-con
Christopher S. Thomas
SRI, Davis-Besse Station

ATTACHMENT

February 18, 2004

MEMORANDUM TO: John A. Grobe, Chairman
Davis-Besse Oversight Panel

FROM: Christine Lipa, Chief */RA/*
Branch 4
Division of Reactor Projects

Anthony J. Mendiola, Chief ***/RA by Christine Lipa for/***
Section 2, Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: REVIEW OF DAVIS-BESSE RESTART COMMITMENTS

The purpose of this memorandum is to document the NRC staff's review of all Davis-Besse Restart Commitments to the NRC's Davis-Besse Oversight Panel. The NRC Projects staff in Region III and in NRR evaluated all licensee pre-restart commitments made since February 2002, including commitments made as part of licensing documentation, bulletin responses, Licensee Event Reports, and other licensee letters and correspondence to the NRC.

The staff has identified no open pre-restart licensee commitments that would preclude the restart of Davis-Besse.

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RESTART CHECKLIST ITEM 5.c: OPERATIONS READINESS FOR RESTART

The NRC's evaluation of this Restart Checklist Item was based on the results of the NRC's December 2003 restart readiness assessment team inspection (IR 03-11), a follow-up restart readiness assessment team inspection (IR-04-04 and associated Memo from the team to the 0350 Panel), resident inspections (IRs 03-25 and 04-02), and information in the licensee's Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station.

In its November 24, 2003, "Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station," and its supplement dated February 6, 2004, Davis-Besse described in detail its corrective actions, including long-term corrective actions, to address problems from its conduct of operations. The corrective actions include new leadership in the operations department, establishment of peer evaluators, and increasing accountability of individuals in adhering to management standards and expectations.

The restart readiness assessment team inspections verified proper alignment of various safety-related systems, and also confirmed that the service water system was operated consistent with the design and licensing documents. In addition, the follow-up inspection team verified that specific problem areas and issues observed during the first restart readiness assessment team inspection, such as pre-job briefings, operator awareness, control room team work, shift turnover, self-checking and procedural use and adherence had been adequately resolved, and that corrective actions for deficiencies involving configuration control were acceptable. Around-the-clock observations of complex control room evolutions were observed by the restart readiness assessment team and the resident inspectors. No significant problems were identified during these observations.

The initial restart readiness assessment team inspection conducted in December 2003 identified a number of operational issues which necessitated a follow-up restart readiness assessment team inspection to assess operational improvements. Although the results from the follow-up inspection were satisfactory, to provide added assurance following restart of the continued effectiveness of the corrective actions in the operations area, the Panel is preparing to issue an Order requiring independent assessments following restart to be conducted annually for five years, or until the licensee has demonstrated good cause that these requirements could be relaxed.

The following is more detailed discussion of the results of the restart readiness assessment team inspections.

The initial inspection was documented in IR 03-11 for inspection conducted in early December 2003. At the time the team concluded that the licensee was not ready to start up the plant because of failures to consistently implement licensee management expectations and standards for conduct of operations. The team found several examples of operators' lack of preparation for plant activities and awareness of plant equipment status, a lack of project oversight to ensure proper rigor in the work control process, concerns regarding the traceability of test equipment, examples of procedure quality and adherence inadequacies, and some corrective actions resulting from operational performance issues in September 2003 were neither tracked nor effective. The Operations Department implemented additional corrective actions and performed internal assessments to gauge the effectiveness of those actions.

ATTACHMENT

The follow-up restart assessment team inspection was conducted during the week of February 2, 2004. The results from the follow-up inspection, documented in IR 04-04, indicated a step improvement in performance as compared to the performance observed in December 2003. It appears that recent changes in Operations Department Management has increased the accountability of the operators. The team noted more consistent implementation of standards and expectations. Although a few examples were noted where expectations were not met, it was not widespread as observed in December 2003. Furthermore, the team noted an increased involvement of management in the observations and assessment of the Operations Department's performance. The team also noted improved work scheduling and noted a significant improvement in the quality of pre-job briefs.

Observations from the resident inspectors as documented in Inspection Reports 03-25 and 04-02 support the conclusions of the restart readiness assessment team inspectors. Taken collectively, the results of NRC inspections and evaluations provide reasonable assurance that the licensee has taken appropriate actions to ensure that the plant can be started and operated safely and in conformance with license and design requirements.

ATTACHMENT

Confirmatory Action Letter Issue Closure

Item 3

"Evaluate and disposition the extent of condition throughout the reactor coolant system relative to the degradation mechanisms that occurred on the RPV head."

Basis for Closure

On April 15, 2002, FENOC began implementation of its "Davis-Besse Containment Health Assurance Plan". The scope of this plan was increased to encompass the overall health of all systems inside the Containment that could have been exposed to boric acid, as well as all systems that contained boric acid. NRC Inspection Report No. 50-346/02-09 (ADAMS Accession No. ML022560237) reviewed the licensee's efforts, including inspection methods, control of walkdown boundaries, resolution of obstructed examinations, and control of inspection records. The inspection identified a lack of acceptance criteria and inadequate training and certification of inspection personnel. Subsequently, NRC Inspection Report No. 50-346/02-12 (ADAMS Accession No. ML023370132) focused on evaluating the licensee's corrective actions to address the two issues identified in the previous inspection. This inspection concluded that the licensee had established appropriate acceptance criteria and inspection personnel had been properly trained and certified. In addition, three focused unresolved technical issues were identified associated with corrective actions for corrosion of electrical conduit, the bottom nozzles on the reactor vessel, and the containment air coolers. Additionally, at that time, the licensee had completed apparent cause determinations with designated corrective actions for only a small number of the components potentially affected by boric acid corrosion.

Subsequently, inspections were performed to evaluate the effectiveness of the licensee's corrective actions to address the remaining components potentially affected by boric acid corrosion and resolve the three open unresolved items. The NRC's inspections noted that the three unresolved items related to the corrosion of electrical conduit, the bottom nozzles on the reactor vessel, and the containment air coolers had been effectively addressed to ensure that these components were operable and capable of performing their safety-related functions. The inspections also determined that all of the components potentially affected by boric acid corrosion had been appropriately addressed in the corrective action process and that the schedules for completion of the planned corrective actions were acceptable. The results of these follow up inspections are documented in NRC Inspection Report Nos. 50-346/03-22 (ADAMS Accession No. ML033570081), and 50-346/03-23 (ADAMS Accession No. ML033421074) with additional information to be documented in NRC Inspection Report No. 50-346/03-10. The licensee requested closure of this item in a letter to the NRC dated November 26, 2003. This item is closed.

ATTACHMENT

Confirmatory Action Letter Issue Closure

Item 4

"Obtain NRC review and approval of the repair or modification and testing plans for the existing RPV head, prior to implementation of those activities. Prior to restart of the reactor, obtain NRC review and approval of any modification and testing activity related to the reactor core or reactivity control systems. If the reactor vessel head is replaced in lieu of repair or modification, the replacement must comply with appropriate Commission rules and industry requirements."

Basis for Closure

NRC Inspection Report No. 50-346/02-07 (ADAMS Accession No. ML023370100) documented review of the non-destructive examinations performed at the Midland, Michigan site on the replacement head and the American Society of Mechanical Engineers (ASME) Code data packages for the replacement head. Based on this inspection, NRC verified that the replacement head was designed and fabricated in conformance with ASME Code requirements and that the original ASME Code Section III N-stamp remained valid. This inspection also reviewed activities associated with the temporary containment access opening and restoration. NRC Inspection Report No. 50-346/03-05 (ADAMS Accession No. ML032230339) documented NRC review of the containment integrated leak rate test. This inspection concluded that containment integrity had been restored following replacement of the reactor head.

Leakage testing of the replacement head was evaluated in NRC Inspection Report No. 50-346/03-23 (ADAMS Accession No. ML033421074) and found acceptable. NRC Inspection Report No. 50-346/04-02 will document inspection of DB-SC-03270, "Control Rod Assembly Insertion Time Test." This activity was observed to evaluate proper control rod movement and alignment. This test was successfully completed on February 10, 2003. The licensee requested closure of this item in a letter to the NRC dated February 23, 2004. This item is closed.

Attachment

February 18, 2004

DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST				
Item Number	Action Item (Date generated)	Assigned to	Comments	Due Date
208	Evaluate the need to call back CI regarding Allegation RIII-2002-A-0177 (D-B) after the OI Investigation is complete (08/21)	D. Passehl	10/14-Investigation is still ongoing; 12/23-Discussed, awaiting DOJ Investigation.	TBD
224	Rewrite the proposed IN on TSP to be generic and reflect attainable plant conditions and what information should be disseminated to the industry concerning Boric Acid Corrosion Control Programs. (12/09)	D. Hills	12/15-Discussed, D. Hills is working; 12/23-Discussed, this issue will be discussed internally in RIII and brought to Panel on 1/06/03 for a final decision on how to proceed; 1/20-Discussed, revised IN is with Panel Chairman for review; 1/30-Discussed, Chairman's comments were sent to J. Lara.	02/15/04
228	Place all Email requests sent throughout Agency, responses received, and issue resolutions in ADAMS package for documentation. (12/16)	R. Baker	1/06-Discussed, will verify ADAMS package is in place to support collection of emails and responses-email requests will be resent due to small response to date; 1/30-Discussed, will verify and update Panel on 2/5/04; 2/3-Discussed, Lead changed, verified ADAMS package in place, coordinate with J. Shea and A. Mendiola that all emails included in ADAMS package. 2/18-Discussed, contents verified and need to add in Steve Long email along with decide on how to document resolutions.	02/20/04
234	Develop protocol paper for NRC representative on DOJ committee interface with 0350 Panel for updates. (01/06)	W. Ruland	10/15/04-Discussed, protocol paper reguarding decision making being drafted as a letter from Sam Collins to Bruce Boger and includes criteria for Immediate Action; 1/20-Discussed, the draft has been sent to B. Boger for DOJ comments; 1/26-Discussed, B. Boger is reviewing with senior management; 2/3-Discussed, protocol paper in review by OGC; 2-18-Discussed, J. Grobe working with Craig	02/20/04
242	Review MC 0350 and philosophy on which documentation is required for public dissemination and which should be retained following plant restart. (1/26)	D. Passehl	2/3-Discussed, will update Panel on review at meeting 2/5/04; 2/5-Discussed, will provide specific on retention of document to Panel on 2/10/04.	02/20/04

Attachment

February 18, 2004

DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST				
Item Number	Action Item (Date generated)	Assigned to	Comments	Due Date
244	Security (J. Creed) contact Department of Homeland Security to verify no concerns for restart. (2/10)	D. Passehl		2/25/04
245	NRR contact FEMA to verify there are still no objections to restart. (2/10)	W. Ruland		2/25/04
246	Verify which remaining meetings of all special inspection team leads with the RA exist. (2/10)	C. Lipa		2/27/04
247	OI/NRR contact discuss restart update with DOJ. (2/17)	W. Ruland		2/20/04
248	Brief the Panel on the similarities and differences between Electrical System Operability Evaluations OE 04-0005 AND OE 03-0009. (2/18)	S. Thomas		2/19/04
249	Ensure Enhanced Inspection Plan includes followup M&HP review of licensee monthly PIs and 2nd quarter corrective action effectiveness for Nov '03 ECP survey results. (2/18)	G. Wright		2/23/04
250	Ensure Enhanced Inspection Plan includes commitments listed in RAM item C-41. (2/18)	C. Lipa		2/23/04
251	Ensure Enhanced Inspection Plan includes a followup on the UHS SW CR resolution. (2/18)	C. Lipa		2/23/04