



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

October 25, 2004

Mr. George Williams
Vice President, Nuclear Operations
Grand Gulf Nuclear Station
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150

**SUBJECT: GRAND GULF NUCLEAR STATION - NRC INTEGRATED INSPECTION
REPORT 05000416/2004004**

Dear Mr. Williams:

On September 30, 2004, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Grand Gulf Nuclear Station. The enclosed inspection report documents the inspection findings, which were discussed on October 6, 2004, with you and members of your staff.

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

Based on the results of this inspection no findings of significance were identified. However, two licensee-identified violations determined to be of very low safety significance are listed in Section 4OA7 of this report. If you contest these noncited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator Region IV; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-001; and the NRC Resident Inspector at the Grand Gulf Nuclear Station.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Entergy Operations, Inc.

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

William D. Johnson, Chief
Project Branch A
Division of Reactor Projects

Docket: 50-416
License: NPF-29

Enclosure:
Inspection Report 050000416/2004004
w/Attachment: Supplemental Information

cc w/enclosure:
Senior Vice President
and Chief Operating Officer
Entergy Operations, Inc.
P.O. Box 31995
Jackson, MS 39286-1995

Wise, Carter, Child & Caraway
P.O. Box 651
Jackson, MS 39205

Winston & Strawn
1400 L Street, N.W. - 12th Floor
Washington, DC 20005-3502

Jay Barkley, Chief
Energy & Transportation Branch
Environmental Compliance and
Enforcement Division
Mississippi Department of
Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

President, District 1
Claiborne County Board of Supervisors
P.O. Box 339
Port Gibson, MS 39150

Entergy Operations, Inc.

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General Manager
Grand Gulf Nuclear Station
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, MS 39150

The Honorable Charles C. Foti, Jr.
Attorney General
Department of Justice
State of Louisiana
P.O. Box 94005
Baton Rouge, LA 70804-9005

Governor Haley Barbour
Office of the Governor
State of Mississippi
Jackson, MS 39201

Mike Moore, Attorney General
Frank Spencer, Asst. Attorney General
State of MS
P.O. Box 22947
Jackson, MS 39225

Dr. Brian W. Amy
State Health Officer
State Board of Health
P.O. Box 1700
Jackson, MS 39215

Robert W. Goff, Program Director
Division of Radiological Health
Mississippi Dept. of Health
P.O. Box 1700
Jackson, MS 39215-1700

Michael A. Krupa, Director
Nuclear Safety & Licensing
Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213-8298

Director, Nuclear Safety
and Regulatory Affairs
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, MS 39150

Entergy Operations, Inc.

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Technological Services

Branch Chief

FEMA Region VI

800 North Loop 288

Federal Regional Center

Denton, TX 76201-3698

Chief, Technological Services Branch

National Preparedness Division

FEMA Region IV

3003 Chamblee-Tucker Road

Atlanta, GA 30341

Electronic distribution by RIV:
 Regional Administrator (**BSM1**)
 DRP Director (**ATH**)
 DRS Director (**DDC**)
 Senior Resident Inspector (**TLH4**)
 Branch Chief, DRP/A (**WDJ**)
 Senior Project Engineer, DRP/A (**TRF**)
 Staff Chief, DRP/TSS (**KMK**)
 RITS Coordinator (**KEG**)
 DRS STA (**DAP**)
 Matt Mitchell, OEDO RIV Coordinator (**MAM4**)
 GG Site Secretary (**MJS acting**)

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RIV:RI:DRP/A	SRI:DRP/A	PE:DRP/A	C:DRS/PSB	C:DRS/EMB
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C:DRS/OB	C:DRS/PEB	C:DRP/A		
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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 50-416

License: NPF-29

Report: 05000416/2004004

Licensee: Entergy Operations, Inc.

Facility: Grand Gulf Nuclear Station (GGNS)

Location: Waterloo Road
Port Gibson, Mississippi 39150

Dates: July 1 through September 30, 2004

Inspectors: T. L. Hoeg, Senior Resident Inspector
G. B. Miller, Resident Inspector
M. E. Murphy, Senior Operations Engineer
A. J. Barrett, Reactor Inspector

Approved By: W. D. Johnson, Chief
Project Branch A
Division of Reactor Projects

Attachment: Supplemental Information

Enclosure

SUMMARY OF FINDINGS

IR 05000416/2004004; 7/1/04 - 9/30/04; Grand Gulf Nuclear Station; routine integrated report.

The report covered a 13-week period of inspection by resident inspectors and an announced inspection by a regional senior operations engineer. Two licensee identified Green noncited violations are described in Section 4OA7 of this report. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609 "Significance Determination Process." Findings for which the Significance Determination Process 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. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

Violations of very low safety significance, which were identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into their corrective action program. These violations and corrective action tracking numbers are listed in Section 4OA7 of this report.

Enclosure

REPORT DETAILS

Summary of Plant Status

Grand Gulf Nuclear Station (GGNS) remained at or near full rated thermal power throughout this inspection period except for planned control rod pattern adjustments and control rod drive maintenance and testing.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

a. Inspection Scope

During the onset of hot weather and hurricane season conditions on August 12, 2004, the inspectors reviewed GGNS readiness to respond to severe weather conditions including tornadoes and hurricanes. The inspectors reviewed Procedure 05-1-02-VI-2, "Hurricanes, Tornadoes, and Severe Weather," Revision 105, and performed site walkdowns to verify the licensee had made the required preparations for severe weather conditions. The inspection also included a detailed review of the main switchyard area for vulnerabilities associated with high winds.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignments (71111.04)

a. Inspection Scope

Partial System Walkdowns. The inspectors performed three partial system walkdowns of systems important to reactor safety during this inspection period in order to verify the operability of the system trains. The inspectors reviewed system operating instructions, required system valve and breaker lineups, operator logs, control room indications, valve positions, breaker positions, and control circuit indications to verify these components were in their required configuration for operability. The following walkdown inspections were conducted:

- On July 1, 2004, an inspector walked down the reactor core isolation cooling system while the high pressure core spray system was out of service for maintenance.
- On July 15, 2004, an inspector walked down the Division I residual heat removal system while the low pressure core spray system was out of service for maintenance.
- On August 3, 2004, an inspector walked down the high pressure core spray system while the reactor core isolation cooling system was out of service for maintenance.

Enclosure

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

Quarterly Tours. The inspectors reviewed area fire plans and performed walkdowns of six plant areas to assess the material condition and operational status of fire detection and suppression systems and equipment, the material condition of fire barriers, and the control of transient combustibles. As part of the inspection, the inspectors reviewed the licensee's fire prevention Procedure 10-S-03-4, "Control of Combustible Material," Revision 13, to ascertain the requirements for the required fire protection design features. Specific risk-significant plant areas included:

- Division I switchgear room OC214
- Division III battery room OC209
- Division I residual heat removal room 1A102
- High pressure core spray diesel generator room 1D304
- Remote shutdown panel room OC208
- Residual heat removal room C 1A118

b. Findings

No findings of significance were identified.

1R06 Flood Protection (71111.06)

a. Inspection Scope

During the week of September 6, 2004, the inspectors reviewed internal flooding protection features and off-normal event Procedure 05-1-02-VI-1, "Flooding," Revision 102, dealing with the potential flooding of the high pressure core spray room area. The inspectors reviewed internal flooding vulnerabilities and the protective features installed to mitigate the impact of any flooding.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification (71111.11)

Quarterly Inspection

a. Inspection Scope

On August 5, 2004, the inspector observed two scenarios during one session of licensed operator requalification training activities in the simulator to assess the licensee's effectiveness in conducting licensed operator training and to verify that licensed operators received the appropriate level of training required to maintain their licenses. The observed training scenarios included GXM-LOR-AEX14, Revision 4, "Diesel Generator 12 Air System Failure with Small LOCA in the Drywell," and GSMS-LOR-AEX18, Revision 4, "Turbine Control Valve 'D' Fails Open with SCRAM and LOCA." The inspectors also observed the post-training critiques conducted by the training instructors and the shift manager.

b. Findings

No findings of significance were identified.

Annual Inspection

a. Inspection Scope

The inspector reviewed the annual operating examination test results for 2004. These results were assessed to determine if they were consistent with NUREG 1021, "Operator Licensing Examination Standards for Power Reactors," Revision 8, Supplement 1, guidance and Manual Chapter 0609, Appendix I, "Operator Requalification Human Performance Significance Determination Process," requirements. This review included examination of test results, which involved one failure out of a total of 60 licensed operators who took the job performance measures aspect of the examination. The individual with the failure was remediated, retested, and passed before being returned to shift duties. One senior operator had not taken the annual examination because of a medical short-term disability, and one senior operator did not take the annual examination because of a management decision to terminate his license. Also, four licensed reactor operators in the senior operator upgrade training program did not take the annual examination.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed performance-based problems involving two selected in-scope structures, systems, or components (SSCs) to assess the effectiveness of the

Maintenance Rule Program. Reviews focused on: (1) proper Maintenance Rule scoping in accordance with 10 CFR 50.65; (2) characterization of failed SSCs; (3) safety significance classifications; (4) 10 CFR 50.65 (a)(1) and (a)(2) classifications; and, (5) the appropriateness of performance criteria for SSCs classified as (a)(2), and goals and corrective actions for SSCs classified as (a)(1). Also, the inspectors reviewed the system functional failures for the last two years. The following systems were reviewed:

- Reactor Protection System C71
- Division III Emergency Diesel Generator P81

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

Throughout the inspection period, the inspectors reviewed weekly and daily work schedules to determine when risk-significant activities were scheduled. The inspectors discussed six selected activities with operations and work control personnel regarding risk evaluations and overall plant configuration control. The inspectors discussed emergent work issues with work control center personnel and reviewed the prioritization of scheduled activities. The inspectors verified the performance of plant risk assessments related to planned and emergent maintenance activities as required by 10 CFR 50.65(a)(4) and plant Procedure 01-S-18-6, "Risk Assessment of Maintenance Activities," Revision 1. Specific maintenance work orders (WO) reviewed during this period included:

- WO 49496, Valve E51-F031 Inspection
- WO 50617531, Division II Emergency Diesel Generator Air Roll
- WO 50974495, Reactor Protection System Testing
- WO 50323487, High Pressure Core Spray System Testing
- WO 46490, 1P41C003 Valve Inspection
- WO 44885, Division II Hydrogen Igniter Maintenance

b. Findings

No findings of significance were identified.

1R14 Nonroutine Events (71111.14)

a. Inspection Scope

On August 2, 2004, the inspector responded to the plant to review the actions taken by the operations department personnel and the fire brigade when responding to a smoke filled reactor core isolation cooling (RCIC) room following scheduled postmaintenance testing of the RCIC pump. No fire was observed and the source of the smoke was

found to be an oil soaked insulation pad near the turbine governor assembly. The insulation pad did not spark or ignite but did produce light smoke when in contact with the hot steam piping. Operations fire brigade personnel responded in a timely manner and removed and quenched the insulation pad to eliminate the smoke source. The smoke was quickly removed from the room by the normal ventilation flow path.

The RCIC room ionization type smoke detectors did not alarm as first expected. The licensee declared the smoke detectors inoperable and established a 1-hour fire watch in the RCIC room until the RCIC room smoke detection system could be further evaluated for satisfactory operation. The licensee later determined that the smoke detectors in the room did not alarm as first expected due to the larger size smoke particles produced by the smoldering effect of non-combustion. The licensee concluded the RCIC room smoke detectors functioned properly as designed (CR-GGNS-2004-3004). The inspectors reviewed site maintenance activities, smoke detector functional test results, engineering analysis, and smoke detector vendor information.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors selected six operability evaluations performed by the licensee during the report period involving risk-significant SSCs. The inspectors evaluated the technical adequacy of the operability determinations, determined whether appropriate compensatory measures were implemented, and determined whether the licensee considered all other pre-existing conditions, as applicable. Additionally, the inspectors evaluated the adequacy of the licensee's problem identification and resolution program as it applied to operability evaluations as specified in Procedure 01-S-06-44, "Operability Assessment," Revision 105. Specific operability evaluations reviewed are listed below.

- CR-GGN-2004-2811, Low pressure core spray system
- CR-GGN-2004-2845, Low pressure core spray system (E21-F012 valve)
- CR-GGN-2004-2872, Low pressure core spray system (E21-F012 valve)
- CR-GGN-2004-2820, Residual heat removal Pump A jockey pump
- CR-GGN-2004-2977, Valve E51F031 over thrust condition
- CR-GGN-2004-3085, Division III standby service water system

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications (71111.17A)

a. Inspection Scope

The inspectors selected a permanent plant modification completed on pipe hanger support assemblies for the standby service water system Train C piping located underwater in the standby service water system Train A basin area. The modification changes the size of several hanger strut assemblies per design change package ER-2003-0138, ERCN 07, "Standby Service Water Pipe Support Repairs," Revision 0. The inspectors verified that: (1) the design bases, licensing bases, and performance capability of the component would not be degraded as a result of the modification; (2) the modification did not create unsafe reactor plant conditions; and, (3) adequate post-installation testing was performed to verify the modification functioned as expected.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed postmaintenance test procedures and associated testing activities for six selected risk-significant mitigating systems. In each case, the associated work orders and test procedures were reviewed against the attributes in Inspection Procedure 71111.19 to determine the scope of the maintenance activity and to determine if the testing was adequate to verify equipment operability. The reviewed activities were:

- WO 50972495, Reactor core isolation cooling system
- WO 50308460, 1T51B006 ventilation maintenance
- WO 39016, 1E51F047 valve maintenance
- WO 40698, 1P41F194A valve maintenance
- WO 51604, 1P81F0500A and 1P81F0500B maintenance
- WO 52259, Division III Diesel Generator synchroscope maintenance

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed performance of surveillance test procedures and reviewed test data of six selected risk-significant SSCs to assess whether the SSCs satisfied the Technical Specifications, Updated Final Safety Analysis Report, Technical Requirements Manual, and licensee procedural requirements; and to determine if the

testing appropriately demonstrated that the SSCs were operationally ready and capable of performing their intended safety functions. The following tests were inspected:

- 06-OP-1P41-Q-005, "Standby Service Water B Quarterly Valve and Pump Functional Test," Revision 115
- 06-OP-1E12-Q-025, "Low Pressure Core Injection/Train C Residual Heat Removal Quarterly Functional Test," Revision 108
- 06-OP-1C71-Q-001, "Main Steam Line Closure Reactor Protection System Quarterly Functional Test," Revision 103
- 06-RE-1B33-D-001, "Reactor Jet Pump Functional Test," Revision 107
- 06-OP-1E51-Q-003, "Reactor Core Isolation Cooling System Quarterly Functional Test," Revision 115
- 06-OP-1P81-R-001, "High Pressure Core Spray System 18-month Functional Test," Revision 112

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed the temporary alteration listed below to assess the following attributes: (1) the adequacy of the safety evaluation; (2) the consistency of the installation with the modification documentation; (3) the updating of drawings and procedures, as applicable; and (4) the adequacy of the post-installation testing.

- Temporary Alteration 2004-017, Low pressure core spray system test return line Valve 1E21-F012 stem locking device.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors sampled licensee submittals for the performance indicators (PIs) listed below for the period from July 2003 through June 2004. To verify the accuracy of the

PI data reported during the period, PI definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2, were used to verify the basis in reporting for each element.

The inspectors reviewed operator log entries, chemistry log entries, daily shift manager reports, plant computer data, condition reports, maintenance action item paperwork, maintenance rule data, and PI data sheets to determine whether the licensee adequately verified the PIs listed below during the previous four quarters. This number was compared to the number reported for the PI during the current quarter. Also, the inspectors interviewed licensee personnel responsible for compiling the information.

Mitigating Events Cornerstone

- C Emergency AC Power System Unavailability
- High Pressure Injection System Unavailability
- Heat Removal System Unavailability

b. Findings

No findings of significance were identified.

4OA2 Problem Identification and Resolution (71152)

.1 Annual Sample Review

a. Inspection Scope

The inspectors selected condition report CR-GGN-2004-2575 for a detailed review including the root cause evaluation report 2004-16 associated with the failure of AMOT[®] temperature control Valve 1P75F501A. The inspectors evaluated the condition report and corrective actions against the requirements of the licensee's corrective action program as delineated in administrative Procedure LI-102, "Corrective Action Process," Revision 4, and 10 CFR Part 50, Appendix B.

b. Findings and Observations

No findings of significance were identified.

.2 Daily Condition Report Review

a. Inspection Scope

As required by Inspection Procedure 71152, "Identification and Resolution of Problems," and in order to help identify repetitive equipment failures or specific human performance issues for followup, the inspectors performed a daily screening of items entered into the licensee's corrective action program. This review was accomplished by reviewing hard copy summaries of each condition report, attending various daily screening meetings, and by accessing the licensee's computerized corrective action program database.

Enclosure

b. Findings and Observations

Two licensee identified very low safety significance violations were reviewed and are documented in Section 4OA7 of this report.

4OA5 Other

Temporary Instruction (TI) 2515/154, "Spent Fuel Material Control and Accounting at Nuclear Power Plants"

a. Inspection Scope

The inspectors collected the data specified in Phases I and II of the TI. The data was forwarded to the individuals identified in the TI, for consolidation and assessment.

4OA6 Meetings, including Exit

On October 6, 2004, the resident inspector presented the inspection results to Mr. G. Williams, Vice President, Operations, and members of his staff. The inspectors confirmed that proprietary information was not provided or examined during the inspections.

4OA7 Licensee-Identified Violations

The following violations of very low safety significance (Green) were identified by the licensee and are violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as noncited violations.

- 10 CFR Part 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," requires the licensee to establish measures to control parts which do not conform to requirements from being inadvertently used or installed. On June 25, 2004, the licensee determined that a temperature element was installed in the Division I emergency diesel generator (EDG) AMOT[®] jacket water temperature control Valve 1P75F501A that had exceeded the vendor recommended qualified shelf life without a review and acceptance of this nonconforming condition. On September 9, 2004, the licensee determined that the temperature elements in the AMOT[®] jacket water temperature control valves (1P81F500A&B) in the Division III EDG had not been replaced since 1989, exceeding the vendor recommended qualified service life of six years without a review and acceptance of this nonconforming condition. These events are documented in the licensee's corrective action program as CR-GGN-2004-2620 and CR-GGN-2004-3352 respectively. These findings are of only very low safety significance because they were qualification deficiencies confirmed not to result in loss of function.

- 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states in part that measures shall be established to assure that conditions adverse to quality, such as deficiencies, are promptly identified and corrected. On August 14, 2004, during planned underwater piping inspections of the Division C standby service water system, the licensee discovered several significantly corroded pipe hanger assemblies which required repair. These hanger assemblies were previously inspected in February of 2003 and found to have some corrosion which was not expected to degrade to the level found on August 14, 2004. This condition is described in the licensee's corrective action program in condition report CR-GN-2002-3085. This finding is of only very low safety significance because it was a design deficiency confirmed not to result in loss of function.

ATTACHMENT: SUPPLEMENTAL INFORMATION

Enclosure

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

C. Abbott, Supervisor, Quality Assurance
D. Barfield, Manager, Outage
C. Bottemiller, Manager, Plant Licensing
C. Buford, Senior Operations Instructor
R. Collins, Manager, Operations
R. Bryan, General Manager, Plant Operations
C. Ellsaesser, Manager, Planning and Scheduling
M. Guynn, Manager, Emergency Preparedness
M. Krupa, Director, Nuclear Safety Assurance
M. Larson, Senior Licensing Engineer
C. Roberts, Supervisor, Requalification Training
M. Rohrer, Manager, System Engineering
G. Sparks, Manager, Design Engineering
R. Sumrall, Emergency Planner
G. Williams, Vice President, Operations
D. Wiles, Director, Engineering
R. Wilson, Superintendent, Radiation Protection
H. Yeldell, Manager, Maintenance

NRC personnel

T. Farnholtz, Senior Project Engineer, Reactor Project Branch A
A. Barrett, Project Engineer, Reactor Project Branch A
R. Nease, Senior Reactor Inspector, DRS

LIST OF DOCUMENTS REVIEWED

Procedures

Administrative Procedure LI-102, "Corrective Action Process," Revision 4

Administrative Procedure 01-S-06-44, "Operability Assessment," Revision 105

Administrative Procedure 01-S-10-4, "Emergency Preparedness Drills and Exercises," Revision 10

Administration Procedure 01-S-11-10, "GGNS Employee's Security Responsibilities," Revision 33

Administration Procedure EL-SP65-SA-0002, "Auxiliary Building Fire Detector and Supervisory Panel Functional Test," Revision 103

Desk Top Procedure EDP-045, "GGNS EOOS Risk Monitor User's Guide," Revision 2

Off-Normal Event Procedure 05-1-02-VI-2, "Hurricanes, Tornadoes, and Severe Weather," Revision 105

Off-Normal Event Procedure 05-1-02-VI-1, "Flooding," Revision 102

Emergency Procedure EP-302, "Severe Weather Response," Revision 2

Emergency Plan Procedure, "Activation of the Emergency Plan," Revision 112

Work Orders

34000	44034	50828	50308460	50617531
34001	44885	50904	50323484	50972495
35896	46490	51604	50323487	50974495
39016	46491	51769	50325054	50976205
40698	49496	52259	50337833	

Condition Reports

CR-GGN-1999-01623	CR-GGN-2004-02847	CR-GGN-2004-03154
CR-GGN-2004-01345	CR-GGN-2004-02848	CR-GGN-2004-03158
CR-GGN-2004-02002	CR-GGN-2004-02849	CR-GGN-2004-03160
CR-GGN-2004-02166	CR-GGN-2004-02854	CR-GGN-2004-03161
CR-GGN-2004-02575	CR-GGN-2004-02859	CR-GGN-2004-03167
CR-GGN-2004-02620	CR-GGN-2004-02872	CR-GGN-2004-03168
CR-GGN-2004-02641	CR-GGN-2004-02899	CR-GGN-2004-03199
CR-GGN-2004-02642	CR-GGN-2004-02971	CR-GGN-2004-03228
CR-GGN-2004-02689	CR-GGN-2004-02977	CR-GGN-2004-03274
CR-GGN-2004-02749	CR-GGN-2004-03004	CR-GGN-2004-03275
CR-GGN-2004-02775	CR-GGN-2004-03017	CR-GGN-2004-03352
CR-GGN-2004-02811	CR-GGN-2004-03047	CR-GGN-2004-03375
CR-GGN-2004-02820	CR-GGN-2004-03064	CR-GGN-2004-03380
CR-GGN-2004-02845	CR-GGN-2004-03085	

Calculations

MC-Q1P41-04027, "SSW C Piping Evaluation," Revision 0

CC-Q1E21-4005, "Valve 1E21F012 Locking Nut," Revision 1

CC-Q1E21-4003, "Valve 1E21F012 Actuator Over Thrust Condition," Revision 2

CC-Q1E21-4002, "Valve 1E21F012 Over Thrust Condition for Operability," Revision 3