

January 17, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer and
Senior Vice President
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
NRC INSPECTION REPORT 05000237/2008007; 05000249/2008007

Dear Mr. Pardee:

On December 18, 2007, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Dresden Nuclear Power Station, Units 2 and 3. The enclosed inspection report documents the inspection findings, which were discussed on December 18, 2007, with Mr. J. Ellis and other members of your staff.

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

Based on the results of this inspection, two NRC identified findings of very low safety significance (Green) were identified. All of these issues involved violations of NRC requirements. However, because of the very low safety significance and because they were entered into your corrective action program, the NRC is treating these violations as Non-Cited Violations (NCVs) consistent with Section VI.A.1. of the NRC Enforcement Policy.

If you contest the subject or severity of an NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001; with copies to the Regional Administrator, Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the Dresden Nuclear Power 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 available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA by A. M. Stone Acting For/

Julio F. Lara, Chief
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-237; 50-249; 72-037

License Nos. DPR-19; DPR-25

Enclosure: 1. Notice of Violation
2. Inspection Report 05000237/2008007; 05000249/2008007
w/Attachment: Supplemental Information

cc w/encl: Site Vice President - Dresden Nuclear Power Station
Plant Manager - Dresden Nuclear Power Station
Regulatory Assurance Manager – Dresden Nuclear Power Station
Chief Operating Officer and Senior Vice President
Senior Vice President - Midwest Operations
Senior Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs
Manager Licensing - Clinton, Dresden, and Quad Cities
Associate General Counsel
Document Control Desk - Licensing
Assistant Attorney General
Illinois Emergency Management Agency
State Liaison Officer
Chairman, Illinois Commerce Commission

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Plant Manager - Dresden Nuclear Power Station
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Chief Operating Officer and Senior Vice President
Senior Vice President - Midwest Operations
Senior Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs
Manager Licensing - Clinton, Dresden, and Quad Cities
Associate General Counsel
Document Control Desk - Licensing
Assistant Attorney General
Illinois Emergency Management Agency
State Liaison Officer
Chairman, Illinois Commerce Commission

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Inspection Report to Mr. Charles Pardee from Mr. Julio Lara dated January 17, 2008.

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
NRC INSPECTION REPORT 05000237/2008007; 05000249/2008007

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No.(s): 50-237; 50-249
License No.(s): DPR-19; DPR-25

Report No: 05000237/2008007; 05000249/2008007

Licensee: Exelon Generation Company

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: Morris, IL 60450

Dates: December 3, 2007 through December 18, 2007

Inspectors: R. C. Daley, Senior Reactor Engineer

Approved by: J. Lara, Chief
Engineering Branch 3
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000237/2008007; 05000249/2008007; 12/03/2007 - 12/18/2007; Exelon Generation Company, Dresden Nuclear Power Station, Units 2 and 3, Component Design Bases Inspection Followup

This report covers a 2-week period of routine inspections by Region III inspectors. Two Green findings, involving Non-Cited Violations, (NCVs) were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process" (SDP). 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. NRC-Identified and Self-Revealing Findings

Cornerstone: Mitigating Events

- SL IV. The inspectors identified a Severity Level IV NCV associated with the failure to perform a safety evaluation in accordance with 10 CFR 50.59. Specifically, the licensee failed to perform a safety evaluation when non-conservatively changing the design basis loading for the emergency diesel generators (EDG) in the design calculation. This resulted in the expected loading during a design basis accident no longer being bounded by the EDG endurance testing requirements contained in the Technical Specifications (TS). Because the licensee did not also evaluate the effect on the existing endurance test loading requirements, the testing no longer adequately verified the capability of the EDG to power its predicted loading during a LOOP/LOCA. This adverse change increased the probability of a malfunction of equipment important to safety EDG during a LOOP/LOCA event.

Because the issue affected the NRC's ability to perform its regulatory function, this finding was evaluated using the traditional enforcement process. The finding was determined to be more than minor because the inspectors could not reasonably determine that the change in EDG loading, which adversely affected equipment important to safety, would not have ultimately required NRC approval. The finding was determined to be of very low safety significance (Green) based on the results of the SDP Phase 1 screening worksheet. Specifically, the licensee was eventually able to demonstrate through an engineering evaluation, that the EDG loads would not exceed the bounding values contained in the endurance test criteria. The inspectors determined that there was no cross cutting aspect to this issue. (Section 1R21.b.1)

- Green. The inspectors identified an NCV for the failure to meet the requirements contained in SR 3.8.1.15. Specifically, the testing that the licensee performed to meet SR 3.8.1.15 did not test to a power factor as close to the accident load power factor as

possible. These testing methods did not demonstrate the capability of the EDG to support the emergency core cooling system loading and were non-conservative. The issue was entered into the licensee's corrective action program.

The issue was more than minor because it was associated with the Mitigating System Cornerstone attribute of "Equipment Performance," and affected the cornerstone objective of ensuring the availability and reliability of the EDGs. Specifically, the licensee's testing methods for SR 3.8.1.15 did not demonstrate the capability of the EDG to support ECCS loading and was non-conservative. This finding was of very low safety significance, because the inspectors answered "No" to all five questions under the Mitigating Systems Cornerstone column of the Phase 1 worksheet. Specifically, the licensee subsequently performed the required testing in SR 3.8.1.15 to the expected power factor, and the EDGs performed satisfactorily. The inspectors determined that there was no cross-cutting aspect to this issue. (Section 1R21.b.2)

B. Licensee-Identified Violations

No findings of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Mitigating Systems

1R21 Component Design Basis Inspection (71111.21)

a. Inspection Scope

During this inspection period, inspectors completed followup inspection activities concerning URI 05000237/249/2002006-02. This URI contained two issues regarding whether the licensee's Technical Specifications (TS) surveillance provided reasonable assurance of the emergency diesel generator's (EDG) capability to carry design basis loads and whether operating the EDG at the reactive load for only 10 minutes of the 24-hour run met the supporting regulatory analysis and intent of the surveillance requirement.

b. Findings

b.1 Failure to Perform a 10 CFR 50.59 Evaluation for Exceeding Continuous Rating on the EDG

Introduction: The inspectors identified a Severity Level IV Non-Cited Violation (NCV) of 10 CFR 50.59 having very low safety significance (Green) for the failure to perform an adequate safety evaluation in accordance with 10 CFR 50.59. Specifically, the licensee failed to perform a safety evaluation when non-conservatively changing the design basis loading for the plant EDGs in their design calculation.

Description: The inspectors identified that the licensee's calculated design basis loads for a Loss of Offsite Power with a Loss of Coolant Accident (LOOP/LOCA) exceeded the continuous rating of the EDG. Dresden Technical Specification (TS) Surveillance Requirement (SR) 3.8.1.15 requires the following:

Verify each DG [diesel generator] operating within the power factor limit operates for 24-hours:

- a. For ≥ 2 hours loaded ≥ 2730 kW [kiloWatt] and ≤ 2860 kW (105 percent to 110 percent of continuous rating); and
- b. For the remaining hours of the test loaded ≥ 2340 kW and ≤ 2600 kW (90 percent to 110 percent of continuous rating)

The intent of this endurance test is to demonstrate that each EDG is in operational readiness to assume the design-basis (LOOP/LOCA) loads even when the redundant EDG has failed. An endurance test (24-hour run) is considered to be a reasonable duration to ascertain if the EDG capability continues to remain intact for a potentially long-term operation that would be

needed to bring the plant to a safe shutdown following a design basis event. The test challenges whether the fuel system will continue to supply fuel in order to keep up with the maximum and varying load demand, the excitation system will produce sufficient magnetic field to maintain voltage, and the voltage regulator will maintain the voltage within acceptable limits. This can be achieved only when the diesel engine is loaded to its expected design basis loading conditions, and when the generator is producing sufficient voltage and current that reflect design basis accident loading. This endurance run verifies the EDG capability should a LOOP/LOCA occur.

Based on the above considerations, as well as review of pertinent regulatory guidance documents, the inspectors concluded that the surveillance test loading should bound the accident loading. However, at Dresden, anticipated LOOP/LOCA loading exceeded the upper limit of the endurance test requirement (2600 kW). In the case of the No. 2 EDG, anticipated loading could be as high as 2851 kW for extended periods of time during such postulated events.

Originally, the licensee's design basis calculations and the facility's Final Safety Analysis Report (FSAR) predicted manual EDG loading to be below 2600 kW. However, during the life of the plant, the design basis EDG loading calculations were revised such that predicted LOOP/LOCA loading increased. During that time period, Calculation Number 71317-33-19-2, Revision 17, was processed which changed the design and license basis predicted loading such that loads exceeded 2600 kW. Prior to this revision, the endurance testing fully demonstrated the capability of the EDGs during a LOOP/LOCA; however, once loads were predicted to be greater than 2600 kW, the testing performed under SR 3.8.1.15 no longer adequately demonstrated the capability of the EDG to power its predicted loading during a LOOP/LOCA. The inspectors concluded that without changing the testing to reflect the new predicted loading, the probability of the EDGs being incapable of carrying predicted loads during a LOOP/LOCA was increased. The design basis reliability of the EDG had been reduced. At the time of the calculation revision, the licensee did not perform an evaluation pursuant to 10 CFR 50.59. The inspectors determined that had the licensee performed such an evaluation, the change would have required a license amendment because the probability of a malfunction of equipment important to safety (i.e., EDG) would have been increased.

The licensee provided the inspectors with historical documents that appeared to show that the NRC had accepted that the auto-connected loads could exceed the continuous rating of the EDG. However, the inspectors could not find any definitive information that would lead them to conclude that the NRC had previously approved that manual loading of the EDG could exceed the continuous rating. The distinction between the two is important, because auto-connected loads are only at their maximum during the initial stages of the event. Shortly after the event initiation, the auto-connected loads become much less. This initial spike in loads is clearly bounded by the EDG testing, since 2 hours of the endurance run is performed between 105 percent and 110 percent of the EDG continuous rating. However, manually connected loads can last for the duration of the event. Therefore, if the manually connected loads exceeded the continuous rating, the 24-hour endurance run, if performed at the

continuous rating, would not bound the actual loads that would be running for the duration of the event.

This issue was addressed by the licensee in a Dresden Engineering White Paper. In the White Paper, the licensee reassessed the loading values for the EDGs removing conservatisms and loads that would not be used later (10 minutes into the event) in the LOOP/LOCA event. By doing this, the licensee was able to conclude that even though initial EDG loading may exceed 2600 kW, the loading at 10+ minutes would be sharply

reduced below the 2600 kW value. Since SR 3.8.1.15 tests for 2 hours at levels above 2600 kW that bound the initial loading of the EDGs, the inspectors found this to be acceptable. The licensee planned to incorporate the results of this analysis into a calculation revision. The licensee entered the issue into their corrective action program as condition report (CR) 485889.

Analysis: The inspectors determined that the licensee's failure to perform a safety evaluation in accordance with 10 CFR 50.59 for changes to their design and license basis was a performance deficiency warranting a significance determination. Specifically, Calculation 7317-33-19-2, Revision 17, was processed in 1994 which changed design and license basis predicted loading for the EDGs such that loads exceeded 2600 kW. Because the licensee did not evaluate this change pursuant to 10 CFR 50.59, the TS EDG surveillance testing in SR 3.8.1.15 no longer adequately verified the capability of the EDG to power its predicted loading during a LOOP/LOCA. This adverse change increased the probability of a malfunction of equipment important to safety (i.e., EDG) during a LOOP/LOCA event.

Following discussions, a subsequent licensee evaluation showed that loading would have remained below 2600 kW at time = 10+ minutes. However, this did not change the impact of the initial change to the design and license basis loading. The changes to the loading calculation changed the accident analyses such that exceeding 2600 kW on the EDGs was determined to be acceptable with no further regulatory reviews performed. The inspectors concluded that the calculation revision resulted in a change to the analyses that would not have been acceptable under 10 CFR 50.59 and would have required either approval from the NRC or a license amendment for a change to the loading requirement for SR 3.8.1.5.

Because violations of 10 CFR 50.59 are considered to be violations that potentially impede or impact the regulatory process, they are dispositioned using the traditional enforcement process instead of the significance determination process (SDP). The finding was determined to be more than minor because the inspectors could not reasonably determine that the changes to the licensee's design basis would not have ultimately required NRC prior approval.

The inspectors completed a significance determination of the underlying technical issue using NRC's inspection manual chapter (IMC) 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations," and answered "No" to the Mitigating Systems screening questions in the Phase 1 Screening Worksheet. Based upon this Phase 1 screening, the inspectors concluded that the issue was of very low safety significance (Green). In accordance with the Enforcement Policy, the violation was therefore classified as a Severity Level IV violation. The inspectors determined that there was no cross cutting aspect to this issue.

Enforcement: Title 10 CFR 50.59(d)(1) states, in part, that the licensee shall maintain records of changes in the facility, of changes in procedures, and of tests and experiments.

These records must include a written evaluation which provides a basis for the determination that the change, test, or experiment does not require a license amendment.

Contrary to the above, the licensee failed to perform a safety evaluation when increasing the design basis load on the EDGs while revising Calculation 7317-33-19-2, Revision 17, in 1994. Since the EDG load testing required by the facility's TS was no longer bounding

after this change, the probability of a malfunction of equipment important to safety (i.e., EDGs) was affected. In accordance with the Enforcement Policy, this violation of the requirements of 10 CFR 50.59 was classified as a Severity Level IV Violation because the underlying technical issue was of very low safety significance. Because this violation was of very low safety significance, was not repetitive or willful, and it was entered into the licensee's corrective action program (CR 485889), this violation is being treated as an NCV consistent with VI.A.1 of the NRC Enforcement Policy (NCV). (NCV 05000237/2008007-01; 05000249/2008007-01)

b.2 Failure to Meet the EDG Power Factor Testing Requirements

Introduction: The inspectors identified an NCV having a very low safety significance (Green) for the failure to meet the EDG power factor testing requirements contained in TS SR 3.8.1.15. Specifically, the testing that the licensee performed to meet SR 3.8.1.15 did not test to a power factor (pf) as close to the accident load power factor as possible. These testing methods did not demonstrate the capability of the EDG to support ECCS loading and were non-conservative.

Description: Dresden Technical Specification (TS) Surveillance Requirement (SR) 3.8.1.15 requires the following:

Verify each DG [diesel generator] operating within the power factor limit operates for 24-hours:

- a. For ≥ 2 hours loaded ≥ 2730 kW and ≤ 2860 kW (105 percent to 110 percent of continuous rating); and
- b. For the remaining hours of the test loaded ≥ 2340 kW and ≤ 2600 kW (90 percent to 110 percent of continuous rating).

This SR is modified by a note which states, "If grid conditions do not permit, the power factor limit is not required to be met. Under this condition, the power factor shall be maintained as close to the limit as practicable."

The Bases for this TS SR states, "In order to ensure that the DG is tested under load conditions that are as close to design conditions as possible, testing must be performed at a power factor as close to the accident load power factor as practicable. When synchronized with offsite power, the power factor limit is ≤ 0.85 . This power factor is chosen to bound the actual worst case inductive loading that the DG could experience under design basis accident conditions."

The licensee developed surveillance procedure DOS 6600-12, "Diesel Generator Tests Endurance and Margin/Full Load Rejection/ECCS/Hot Restart," to demonstrate compliance with SR 3.8.1.15. In this surveillance test, the diesel is connected to the grid and operated for 2 hours at a load between 2730 and 2860 kW for the remaining 22 hours of the test.

Sometime during this 22-hour period, the power factor is adjusted by increasing KVARs to a band of 1550 to 1600 (0.83 - 0.86 pf) if possible, keeping the voltage on the emergency bus less than 4300 volts. This is held for only 10 minutes before returning to the ± 300 kVAR band. The inspectors were concerned, because this testing did not meet the intent of the TS SR because it did not bound the actual worst case inductive loading that the

EDG could experience under design basis accident conditions. The licensee only tested to 0.85 pf for 10 minutes during the performance of SR 3.8.1.15. While the TS did provide provisions to accommodate cases when the plant conditions cannot allow generation of sufficient kVAR to match design basis kVAR loading, the licensee's testing methodology did not follow these provisions. Prior to EDG testing, the licensee did not perform any evaluation as to the condition of the grid, with respect to whether or not the power factor limit can be achieved. Rather, regardless of whether the grid conditions may support testing at the power factor limit, the licensee had established a testing practice that only tests at this limit for 10 minutes.

The inspectors determined that the licensee's testing methods did not demonstrate the capability of the EDG to support ECCS loading and was non-conservative. The licensee entered this issue into their corrective action program as CR 485889.

Analysis: The inspectors determined that the licensee's failure to meet the EDG power factor testing requirements contained in TS SR 3.8.1.15 was a performance deficiency warranting a significance determination. Specifically, the testing that the licensee performed to meet SR 3.8.1.15 did not test the EDG at a power factor as close to the accident load power factor as possible. The issue was more than minor because it was associated with the Mitigating System Cornerstone attribute of "Equipment Performance," and affected the cornerstone objective of ensuring the availability and reliability of the EDGs. Specifically, the licensee's testing methods for SR 3.8.1.15 did not demonstrate the capability of the EDG to support ECCS loading and was non-conservative.

The finding screened as having very low significance (Green) using IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for the At-Power Situations," because the inspectors answered "No" to all five questions under the Mitigating Systems Cornerstone column of the Phase 1 worksheet. Specifically, the licensee subsequently performed the required testing in SR 3.8.1.15 to the expected power factor, and the EDGs performed satisfactorily. The inspectors determined that there was no cross cutting aspect to this issue.

Enforcement: Dresden SR 3.8.1.15 states, in part, that the licensee is required to verify each EDG operates within the power factor limit for 24-hours. This testing methods for this SR should demonstrate the capability of the EDG to support ECCS loading. This capability includes the operating at the power factor that would be expected during the design basis accident (LOCA) event.

Contrary to the above, the testing that the licensee performed to meet SR 3.8.1.15 did not test to a power factor as close to the accident load power factor as possible. The inspectors determined that the licensee's testing methods did not demonstrate the capability of the EDG to support ECCS loading and was non-conservative. Because this failure to comply with the requirements in SR 3.8.1.15 was determined to be of very low safety significance and because it was entered in the licensee's corrective action program

as CR 485889, this violation is being treated as an NCV, consistent with Section VI.A.1 of the NRC Enforcement Policy. (NCV 05000237/2008007-02; 05000249/2008007-02)

4. OTHER ACTIVITIES (OA)

4OA5 Other Activities

.1 (Closed) Unresolved Item (URI) 0500237/249/2002006-02: Non-Conservative Emergency Diesel Generator Testing

This URI contained two issues regarding whether the licensee's Technical Specifications (TS) surveillance provided reasonable assurance of the emergency diesel generator's (EDG) capability to carry design basis loads and whether operating the EDG at the reactive load for only 10 minutes of the 24-hour run met the supporting regulatory analysis and intent of the surveillance requirement. This URI had been previously updated in inspection report 0500237/249/2005-009. Based on the information discussed in Section 1R21.b of this report, two NCVs were identified. Therefore, this URI is closed.

4OA6 Meetings

.1 Exit Meetings

The inspectors presented the inspection results to Mr. James Ellis and other licensee members at the conclusion of the inspection on December 18, 2007. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

**SUPPLEMENTAL INFORMATION
KEY POINTS OF CONTACT**

Licensee

J. Ellis, Regulatory Assurance Manager

Nuclear Regulatory Commission

M. Ring, Chief, Division of Reactor Projects, Branch 1

IEMA

R. Schulz, Illinois Emergency Management Agency

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None.

Opened and Closed

05000237/2008007-01; 05000249/2008007-01	NCV	Failure to Perform a 10 CFR 50.59 Evaluation for Exceeding Continuous Rating on the EDG. (Section 1R21.b.1)
05000237/2008007-02; 05000249/2008007-02	NCV	Failure to Meet the EDG Power Factor Testing Requirements. (Section 1R21.b.2)

Closed

05000237/2002006-02; 05000249/2002006-02	URI	Non-Conservative Emergency Diesel Generator Testing. (Section 4OA5.1)
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Discussed

None

LIST OF DOCUMENTS REVIEWED

Calculations

Calculation 7317-33-19-2; Diesel Generator Loading Under Design Basis Accident Condition; dated January 21, 1993

Calculation 7317-33-19-2; Diesel Generator Loading Under Design Basis Accidents Condition; dated January 28, 1994

Condition Reports

CR 485889, Op Eval 06-002; EDG Endurance Test Operability Evaluation; dated October 26, 2006

CR 140598; EDG Loading Values Removed from the UFSAR; dated January 22, 2003

LIST OF ACRONYMS USED

CR	Condition Report
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
IMC	Inspection Manual Chapter
kW	Kilowatts
kVAR	Kilovolt Amps Reactive
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
NCV	Non-Cited Violation
NRC	U.S. Nuclear Regulatory Commission
pf	Power Factor
SDP	Significance Determination Process
SR	Surveillance Requirement
TS	Technical Specification
URI	Unresolved Item