



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352**

April 22, 2009

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

**SUBJECT: CLINTON POWER STATION NRC INTEGRATED INSPECTION
REPORT 05000461/2009-002**

Dear Mr. Pardee:

On March 31, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Clinton Power Station. The enclosed report documents the inspection results, which were discussed on April 9, 2009, with Mr. F. Kearney and other members of your staff.

This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. 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.

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 (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Mark A. Ring, Chief
Branch 1
Division of Reactor Projects

Docket No. 50-461
License No. NPF-62

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Letter to C. Pardee from M. Ring dated April 22, 2009

SUBJECT: CLINTON POWER STATION NRC INTEGRATED INSPECTION
REPORT 05000461/2009-002

cc w/encl: Site Vice President - Clinton Power Station
Plant Manager - Clinton Power Station
Manager Regulatory Assurance - Clinton Power Station
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-461

License No: NPF-62

Report No: 05000461/2009-002

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, IL

Dates: January 1 through March 31, 2009

Inspectors: B. Kemker, Senior Resident Inspector
D. Lords, Resident Inspector
J. Benjamin, Senior Project Engineer
J. Draper, Reactor Engineer
D. Jones, Reactor Engineer
M. Mitchell, Health Physicist
R. Winter, Reactor Engineer
S. Mischke, Resident Inspector, Illinois Emergency
Management Agency

Approved by: M. Ring, Chief
Branch 1
Division of Reactor Projects

Enclosure

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SUMMARY OF FINDINGS

IR 05000461/2009-002, 01/01/09 – 03/31/09, Clinton Power Station, Integrated Inspection Report.

This report covers a 3-month period of inspection by resident inspectors and announced baseline inspections by regional inspectors. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

No violations of significance were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

Summary of Plant Status

The unit was operated at or near full power during the inspection period with the following exception:

On February 28, 2009, the licensee reduced power to about 66 percent to perform control rod pattern adjustment, control rod settle testing, scram time testing, and main turbine control/intermediate valve and main steam isolation valve testing. The unit was returned to full power later the same day upon completion of testing.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

.1 Extended Freezing Period Walkdown

a. Inspection Scope

During post-winterization walkdowns conducted on February 15, 2009, the inspectors toured plant areas to monitor the physical condition of cold weather protection features following a period of extended freezing temperatures. The inspectors observed insulation, heat trace circuits, space heater operation, and weatherized enclosures to ensure operability of affected systems.

This inspection constituted one site imminent adverse weather inspection sample as defined by Inspection Procedure 71111.01.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment (71111.04)

.1 Quarterly Partial System Walkdowns (71111.04Q)

a. Inspection Scope

The inspectors performed partial system walkdowns of the following risk significant systems:

- Division 2 Standby Gas Treatment Train during maintenance on Division 1 Standby Gas Treatment Train;
- High Pressure Core Spray (HPCS) System (single train risk significant system); and
- Residual Heat Removal (RHR) System Train 'A' during maintenance on RHR System Train 'B'.

The inspectors selected these systems based on their risk significance relative to the reactor safety cornerstones. The inspectors reviewed operating procedures, system diagrams, Technical Specification (TS) requirements, and the impact of ongoing work activities on redundant trains of equipment. The inspectors verified that conditions did not exist that could have rendered the systems incapable of performing their intended functions. The inspectors also walked down accessible portions of the systems to verify system components were aligned correctly and available as necessary.

In addition, the inspectors verified that equipment alignment problems were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted three partial system walkdown inspection samples as defined by Inspection Procedure 71111.04.

b. Findings

No findings of significance were identified.

.2 Semi-Annual Complete System Walkdown (71111.04S)

a. Inspection Scope

The inspectors performed a complete system alignment inspection of the component cooling water system to verify the functional capability of the system. This system was selected because it was considered both safety significant and risk significant in the licensee's probabilistic risk assessment. The inspectors walked down the system to review mechanical and electrical equipment lineups, electrical power availability, system pressure and temperature indications, as appropriate, component labeling, component lubrication, component and equipment cooling, hangers and supports, operability of support systems, and to ensure that ancillary equipment or debris did not interfere with equipment operation. A review of a sample of past and outstanding work orders was performed to determine whether any deficiencies significantly affected the system function. In addition, the inspectors reviewed the corrective action program database to ensure that system equipment alignment problems were being identified and appropriately resolved.

This inspection constituted one complete system walkdown inspection sample as defined by Inspection Procedure 71111.04.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Routine Resident Inspector Tours (71111.05Q)

a. Inspection Scope

The inspectors performed fire protection tours in the following plant areas:

- Fire Zone CB 1-f, General Access Area - El. 762'0",
- Fire Zone CB 1-g, Unit 2 Cable Spreading Rooms - El. 781'0";
- Fire Zone A2-m, Containment Electrical Penetration (East) Area - El. 762'0";
- Fire Zone A3-e, Containment Electrical Penetration (West) Area - El. 762'0";
- Fire Zone A-4, Division 1 Battery Room - El. 781'0"; and
- Fire Zone A-5, Division 2 Battery Room - El. 781'0".

The inspectors verified that transient combustibles and ignition sources were appropriately controlled and assessed the material condition of fire suppression systems, manual fire fighting equipment, smoke detection systems, fire barriers and emergency lighting units. The inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use; that fire detectors and sprinklers were unobstructed; that transient material loading was within the analyzed limits; that the licensee's fire plan was in alignment with actual conditions; and that fire doors, dampers, and penetration seals appeared to be in satisfactory condition.

In addition, the inspectors verified that fire protection related problems were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted six quarterly fire protection inspection samples as defined by Inspection Procedure 71111.05AQ.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Regualification Program (71111.11)

.1 Resident Inspector Quarterly Review (71111.11Q)

a. Inspection Scope

The inspectors observed licensed operators during simulator training on February 4, 2009. The inspectors assessed the operators' response to the simulated events focusing on alarm response, command and control of crew activities, communication practices, procedural adherence, and implementation of Emergency Plan requirements. The inspectors also observed the post-training critique to assess the ability of licensee evaluators and operating crews to self-identify performance deficiencies. The crew's performance in these areas was compared to pre-established operator action expectations and successful critical task completion requirements.

This inspection constituted one quarterly licensed operator requalification inspection sample as defined by Inspection Procedure 71111.11.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

The inspectors evaluated the licensee's handling of selected degraded performance issues involving the following risk significant structures, systems, and components (SSCs):

- Reactor Recirculation System; and
- Emergency Diesel Generators.

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the SSCs. Specifically, the inspectors independently verified the licensee's handling of SSC performance or condition problems in terms of:

- appropriate work practices;
- identifying and addressing common cause failures;
- scoping of SSCs in accordance with 10 CFR 50.65(b);
- characterizing SSC reliability issues;
- tracking SSC unavailability;
- trending key parameters (condition monitoring);
- 10 CFR 50.65(a)(1) or (a)(2) classification and reclassification; and
- appropriateness of performance criteria for SSC functions classified (a)(2) and/or appropriateness and adequacy of goals and corrective actions for SSC functions classified (a)(1).

In addition, the inspectors verified that problems associated with the effectiveness of plant maintenance were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted two maintenance effectiveness inspection samples as defined by Inspection Procedure 71111.12.

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

The inspectors reviewed the licensee's evaluation and management of plant risk for maintenance and emergent work activities affecting risk significant and safety-related

equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- Planned maintenance during the week of January 20th on the HPCS System (risk significant single train system);
- Planned maintenance during the week of February 2nd on the 4160 Volt Bus 1 Reserve Feed and 6900 Volt Bus 1A Reserve Feed Breakers, and Standby Liquid Control Pump 'A;'
- Planned maintenance during the week of February 9th on the Division 2 Diesel Generator and Division 2 Standby Gas Treatment System;
- Planned maintenance during the week of March 2nd on the Division 1 Hydrogen Recombiner and Division 1 Standby Gas Treatment System;
- Planned maintenance during the week of March 16th on RHR Heat Exchanger 'B' and Division 2 Shutdown Service Water System; and
- Emergent maintenance following the Emergency Reserve Auxiliary Transformer Static VAR [Volt-Ampere Reactive] Compensator Trip on February 21st.

These activities were selected based on their potential risk significance relative to the reactor safety cornerstones. As applicable for each of the above activities, the inspectors reviewed the scope of maintenance work in the plant's daily schedule, reviewed Control Room logs, verified that plant risk assessments were completed as required by 10 CFR 50.65(a)(4) prior to commencing maintenance activities, discussed the results of the assessment with the licensee's Probabilistic Risk Analyst and/or Shift Technical Advisor, and verified that plant conditions were consistent with the risk assessment assumptions. The inspectors also reviewed TS requirements and walked down portions of redundant safety systems, when applicable, to verify that risk analysis assumptions were valid, that redundant safety-related plant equipment necessary to minimize risk was available for use, and that applicable requirements were met.

In addition, the inspectors verified that maintenance risk-related problems were entered into the licensee's corrective action program with the appropriate significance characterization. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted six maintenance risk assessment inspection samples as defined by Inspection Procedure 71111.13.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following issues:

- AR 00821106, "1SX014C Did Not Fully Close Via Main Control Room Handswitch;"
- AR 00803617, "Switchyard South Bus Voltage Exceeds High Limit;"
- AR 00814191, "Six (6) Bolt Assemblies Are Missing From Penetration 1EE44E;"

- AR 00864500, "Auxiliary Building Steam Tunnel Temperature Shows a Step Change and Increasing Trend;"
- AR 00890462, "Nuclear Oversight Identified Key Probabilistic Risk Assessment Operator Actions Not Directly Supported by Procedures;" and
- AR 00872963, "OVC022A Open Stroke Time Outside Acceptance Criteria."

The inspectors selected these potential operability issues based on the risk significance of the associated components and systems. The inspectors verified that the conditions did not render the associated equipment inoperable or result in an unrecognized increase in plant risk. When applicable, the inspectors verified that the licensee appropriately applied TS limitations, appropriately returned the affected equipment to an operable status, and reviewed the licensee's evaluation of the issues with respect to the regulatory reporting requirements. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations.

In addition, the inspectors verified that problems related to the operability of safety-related plant equipment were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted six operability evaluation inspection samples as defined by Inspection Procedure 71111.15.

b. Findings

No findings of significance were identified.

1R18 Plant Modifications (71111.18)

.1 Temporary Modifications

a. Inspection Scope

The inspectors reviewed the following temporary plant modifications:

- EC 372721, "Install Shim on Side of Valve Limit Switch Actuator to Provide Additional Travel for Limit Switch #5 on 1B21F028A;" and
- EC 369695, "Remove Nuisance Alarm Input to Annunciator Window 5012-6B."

The first temporary modification added magnet shims to a main steam system valve actuator to address past issues with limit switch #5 re-setting. The second temporary modification removed a nuisance alarm input to a main control room annunciator, while maintaining use of the remaining alarm inputs to the annunciator.

The inspectors reviewed the temporary modifications and the associated 10 CFR 50.59 screening/evaluations against applicable system design basis documents, including the Updated Final Safety Analysis Report (UFSAR) and the TS to verify whether applicable design basis requirements were satisfied. The inspectors reviewed the operator logs

and interviewed engineering and operations department personnel to understand the impact that implementation of the temporary modifications had on operability and availability of the affected plant SSCs. The inspectors reviewed post modification testing performed and existing corrective action assignments necessary to remove the temporary modifications and restore the affected SSCs to an approved permanent design configuration.

The inspectors also reviewed a sample of action requests pertaining to temporary modifications to verify that problems were entered into the licensee's corrective action program with the appropriate significance characterization and that corrective actions were appropriate.

This inspection constituted two temporary modification inspection samples as defined by Inspection Procedure 71111.18.

b. Findings

No findings of significance were identified.

.2 Permanent Modifications

a. Inspection Scope

The inspectors reviewed the engineering analyses, modification documents, and design change information associated with the following permanent plant modification:

- EC 349235, "Replace Division 1 Diesel Generator Governor Actuators."

During this inspection, the inspectors evaluated the implementation of the design modification and verified, as appropriate, that:

- the compatibility, functional properties, environmental qualification, seismic qualification, and classification of materials and replacement components were acceptable;
- the structural integrity of the SSCs would be acceptable for accident/event conditions;
- the implementation of the modification did not impair key safety functions;
- no unintended system interactions occurred;
- the affected significant plant procedures, such as normal, abnormal, and emergency operating procedures, testing and surveillance procedures, and training were identified and necessary changes were completed;
- the design and licensing documents were either updated or were in the process of being updated to reflect the modification;
- the changes to the facility and procedures, as described in the UFSAR, were appropriately reviewed and documented in accordance with 10 CFR 50.59;
- the system performance characteristics, including energy needs affected by the modification continued to meet the design basis;
- the modification test acceptance criteria were met; and
- the modification design assumptions were appropriate.

Completed activities associated with the implementation of the modification, including testing, were also inspected, and the inspectors discussed the modification with the responsible engineering and operations staff.

This inspection constituted one permanent modification inspection sample as defined by Inspection Procedure 71111.18.

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed post-maintenance testing for the following activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

- Planned maintenance to replace Division 1 And Division 2 Rod Control Information System Power Supplies;
- Planned maintenance on Control Room Ventilation Makeup Train 'A' Downstream Air Flow Controller 0FICVC072;
- Planned maintenance on Drywell Cooling Ventilation Train 'B' Side Stream Filter Skid 1FI-VP350B;
- Planned maintenance on Division 1 Standby Gas Treatment System Valves and Room Cooler;
- Planned maintenance to replace Hydraulic Control Units for Control Rods 12-17 and 36-25;
- Planned maintenance on the Division 3 Essential Switchgear Cooling System Chiller; and
- Planned maintenance to replace a circuit card for the Swing Battery Charger 1DC11E Feed to DC Bus.

The inspectors reviewed the scope of the work performed and evaluated the adequacy of the specified post-maintenance testing. The inspectors verified that the post-maintenance testing was performed in accordance with approved procedures; that the procedures contained clear acceptance criteria, which demonstrated operational readiness and that the acceptance criteria was met; that appropriate test instrumentation was used; that the equipment was returned to its operational status following testing, and that the test documentation was properly evaluated.

In addition, the inspectors reviewed corrective action program documents associated with post-maintenance testing to verify that identified problems were entered into the licensee's corrective action program with the appropriate characterization. Selected action requests were reviewed to verify that the corrective actions were appropriate and implemented as scheduled.

This inspection constituted seven post-maintenance testing inspection samples as defined by Inspection Procedure 71111.19.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the test results for the following surveillance testing activities to determine whether risk significant systems and equipment were capable of performing their intended safety function and to verify that the testing was conducted in accordance with applicable procedural and TS requirements:

- CPS 9051.01, "HPCS Pump & HPCS Water Leg Pump Operability," (Inservice Test);
- CPS 9052.01, "LPCS [Low Pressure Core Spray] /RHR A & LPCS/RHR A Water Leg Pump Operability," (Inservice Test);
- CPS 9831.01, "LPRM [Local Power Range Monitor] Calibration;"
- CPS 9069.02, "Shutdown Service Water Valve Operability Test," (Inservice Test);
- CPS 9080.01, "Diesel Generator 1A Operability - Manual and Quick Start Operability;"
- CPS 9813.01, "Control Rod Scram Time Testing;" and
- CPS 9031.06, "Main Turbine Stop Valve and CIV [Combined Intermediate Valve] Tests."

The inspectors observed selected portions of the test activities to verify that the testing was accomplished in accordance with plant procedures. The inspectors reviewed the test methodology and documentation to verify that equipment performance was consistent with safety analysis and design basis assumptions, and that testing acceptance criteria were satisfied.

In addition, the inspectors verified that surveillance testing problems were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted three in-service tests and four routine surveillance tests for a total of seven inspection samples as defined by Inspection Procedure 71111.22.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

.1 Emergency Preparedness Drill Observation

a. Inspection Scope

The inspectors evaluated the conduct of a full scale emergency preparedness drill on February 25, 2009, to identify any weaknesses and deficiencies in classification, notification, and protective action recommendation development activities. This drill was planned to be evaluated and was included in performance indicator data regarding drill and exercise performance. The inspectors observed emergency response operations in the Operations Simulator, Operations Support Center, and Technical Support Center to determine whether the event classification, notifications, and protective action recommendations were performed in accordance with procedures. The inspectors also attended the licensee's drill critique to compare any inspector-observed weaknesses with those identified by the licensee's staff in order to evaluate the critique and to verify whether the licensee's staff was properly identifying weaknesses and entering them into the corrective action program.

This inspection constituted one emergency preparedness drill inspection sample as defined by Inspection Procedure 71114.06.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Public Radiation Safety

2PS2 Radioactive Material Processing and Transportation (71122.02)

.1 Radioactive Waste System

a. Inspection Scope

The inspectors reviewed the liquid and solid radioactive waste system description in the UFSAR for information on the types and amounts of radioactive waste (radwaste) generated and disposed. The inspectors reviewed the scope of the licensee's audit program with regard to radioactive material processing and transportation programs to verify that it met the requirements of 10 CFR 20.1101(c).

This inspection constituted one sample as defined in IP 71122.02–5.

b. Findings

No findings of significance were identified.

.2 Radioactive Waste System Walkdowns

a. Inspection Scope

The inspectors performed walkdowns of the liquid and solid radwaste processing systems to verify that the systems agreed with the descriptions in the UFSAR and the Process Control Program and to assess the material condition and operability of the systems. The inspectors reviewed the status of radwaste processing equipment that was not operational and/or was abandoned in place. The inspectors reviewed the licensee's administrative and physical controls to ensure that the equipment would not contribute to an unmonitored release path or be a source of unnecessary personnel exposure.

The inspectors reviewed changes to the waste processing system to verify that the changes were reviewed and documented in accordance with 10 CFR 50.59 and to assess the impact of the changes on radiation dose to members of the public. The inspectors reviewed the current processes for transferring waste resin into shipping containers to determine if appropriate waste stream mixing and/or sampling procedures were utilized. The inspectors also reviewed the licensee's methods for waste concentration averaging to determine if representative samples of the waste product were provided for the purposes of waste classification, as required by 10 CFR 61.55.

This inspection constituted one sample as defined in IP 71122.02–5.

b. Findings

No findings of significance were identified.

.3 Waste Characterization and Classification

a. Inspection Scope

The inspectors reviewed the licensee's radiochemical sample analysis results for each of the licensee's waste streams, including dry active waste, spent resins, and filters. The inspectors also reviewed the licensee's use of scaling factors to quantify difficult-to-measure radionuclides (e.g., pure alpha or beta emitting radionuclides). The reviews were conducted to verify that the licensee's program assured compliance with 10 CFR 61.55 and 10 CFR 61.56, as required by Appendix G of 10 CFR Part 20. The inspectors also reviewed the licensee's waste characterization and classification program to ensure that the waste stream composition data accounted for changing operational parameters and thus remained valid between the annual sample analysis updates.

This inspection constituted one sample as defined in IP 71122.02–5.

b. Findings

No findings of significance were identified.

.4 Shipment Preparation and Shipment Manifests

a. Inspection Scope

The inspectors reviewed the documentation of shipment packaging, radiation surveys, package labeling and marking, vehicle inspections and placarding, emergency instructions, determination of waste classification/isotopic identification, and licensee verification of shipment readiness for five material and radwaste shipments made in 2007 to 2009. The shipment documentation reviewed consisted of:

- One Limited Quantity Shipment to a Contractor; and
- Three LSA-II and One Type-B(U) Packages to Barnwell.

For each shipment, the inspectors determined if the requirements of 10 CFR Parts 20 and 61 and those of the Department of Transportation (DOT) in 49 CFR Parts 170–189 were met. Specifically, records were reviewed and staff involved in shipment activities was interviewed to determine if packages were labeled and marked properly, if package and transport vehicle surveys were performed with appropriate instrumentation, if radiation survey results satisfied DOT requirements, and if the quantity and type of radionuclides in each shipment were determined accurately. The inspectors also determined whether shipment manifests were completed in accordance with DOT and NRC requirements, if they included the required emergency response information, if the recipient was authorized to receive the shipment, and if shipments were tracked as required by 10 CFR 20, Appendix G.

This inspection constitutes one sample as defined by Inspection Procedure 71122.02–5.

Selected staff involved in shipment activities were observed by the inspectors to determine if they had adequate skills to accomplish shipment related tasks and to determine if the shippers were knowledgeable of the applicable regulations to satisfy package preparation requirements for public transport with respect to NRC Bulletin 79–19, “Packaging of Low-Level Radioactive Waste for Transport and Burial,” and 49 CFR Part 172, Subpart H.

This inspection constitutes one sample as defined by Inspection Procedure 71122.02–5.

b. Findings

No findings of significance were identified.

.5 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed condition reports, audits and self assessments that addressed radioactive waste and radioactive materials shipping program deficiencies since the last inspection to verify that the licensee had effectively implemented the corrective action program and that problems were identified, characterized, prioritized and corrected. The inspectors also verified that the licensee's self-assessment program was capable of identifying repetitive deficiencies or significant individual deficiencies in problem identification and resolution.

The inspectors reviewed corrective action reports from the radioactive material and shipping programs since the previous inspection, interviewed staff and reviewed documents to determine if the following activities were being conducted in an effective and timely manner commensurate with their importance to safety and risk:

- Initial problem identification, characterization, and tracking;
- Disposition of operability/reportability issues;
- Evaluation of safety significance/risk and priority for resolution;
- Identification of repetitive problems;
- Identification of contributing causes;
- Identification and implementation of effective corrective actions;
- Resolution of Non-Cited Violations tracked in the corrective action system; and
- Implementation/consideration of risk significant operational experience feedback.

This inspection constituted one sample as defined in IP 71122.02–5.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Review of Submitted Quarterly Data

a. Inspection Scope

The inspectors performed a review of the data submitted by the licensee for the Fourth Quarter 2008 Performance Indicators for any obvious inconsistencies prior to its public release in accordance with Inspection Manual Chapter (IMC) 0608, "Performance Indicator Program."

This inspection was not considered to be an inspection sample as defined by Inspection Procedure 71151.

b. Findings

No findings of significance were identified.

.2 Unplanned Scrams per 7000 Critical Hours

a. Inspection Scope

The inspectors verified the Unplanned Scrams per 7000 Critical Hours Performance Indicator for Unit 1. The inspectors reviewed each Licensee Event Report (LER) from January 1, 2008, through December 31, 2008, determined the number of scrams that occurred, and verified the licensee's calculation of critical hours. The inspectors also reviewed the licensee's corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified.

This inspection constituted one performance indicator verification inspection sample as defined by Inspection Procedure 71151.

b. Findings

No findings of significance were identified.

.3 Unplanned Scrams with Complications

a. Inspection Scope

The inspectors verified the Unplanned Scrams with Complications Performance Indicator for Unit 1. The inspectors reviewed each LER from January 1, 2008, through December 31, 2008, determined the number of scrams that occurred, and evaluated each of the scrams against the performance indicator definition. The inspectors also reviewed the licensee's corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified.

This inspection constituted one performance indicator verification inspection sample as defined by Inspection Procedure 71151.

b. Findings

No findings of significance were identified.

.4 Unplanned Transients per 7000 Critical Hours

a. Inspection Scope

The inspectors verified the Unplanned Transients per 7000 Critical Hours Performance Indicator for Unit 1. The inspectors reviewed power history data from January 1, 2008, through December 31, 2008, determined the number of power changes greater than 20 percent full power that occurred, evaluated each of the power changes against the performance indicator definition, and verified the licensee's calculation of critical hours. The inspectors also reviewed the licensee's corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator. One minor reporting error was previously identified by the inspectors.

This inspection constituted one performance indicator verification inspection sample as defined by Inspection Procedure 71151.

b. Findings

No findings of significance were identified.

.5 Safety System Functional Failures

a. Inspection Scope

The inspectors verified the Safety System Functional Failures Performance Indicator for Unit 1. The inspectors reviewed each LER from January 1, 2008, through December 31, 2008, determined the number of safety system functional failures that occurred, evaluated each LER against the performance indicator definition, and verified the number of safety system functional failures reported. The inspectors also reviewed the licensee's corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified.

This inspection constituted one performance indicator verification inspection sample as defined by Inspection Procedure 71151.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems (71152)

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that they were being entered into the licensee's corrective action program at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. Some minor issues were entered into the licensee's corrective action program as a result of the inspectors' observations; however, they are not discussed in this report.

This inspection was not considered to be an inspection sample as defined by Inspection Procedure 71152.

b. Findings

No findings of significance were identified.

4OA3 Followup of Events and Notices of Enforcement Discretion (71153)

.1 (Closed) LER 05000461/2007-002-00, "Improper Installation of Stanchions in Containment Pool Swell Zone"

The licensee failed to adequately secure four radiation protection (RP) stanchions to the deck grating at the 755' elevation in the containment building, which could have affected the function of safety-related equipment following a design basis accident. Contrary to procedure CPS 1019.05, "Transient Equipment/Materials," Step 8.5.3, the four stanchions were secured to the deck grating with plastic tie-wraps instead of metal

grating clips. The licensee performed evaluation EC 365177, "Review of Design Basis of RP Stanchions in Containment," and concluded that the tie-wraps would not be able to withstand the force of suppression pool swell. The licensee identified two containment isolation valves (1FC007, Spent Fuel Pool Cooling and Cleanup Containment Outlet Inboard Isolation Valve and 1FP053, Fire Protection Containment Inboard Isolation Valve) that could have been affected by a stanchion missile hazard. The licensee's evaluation conservatively assumed that the missiles created could impinge on the two containment isolation valves and prevent their containment isolation function. It was also determined that during a loss of offsite power/loss of coolant accident, containment isolation could only be assured if the Division 1 diesel generator was operable during the time the stanchions were in place. The licensee reported this event as a condition that could have prevented fulfillment of the containment isolation system safety function in accordance with 10 CFR 50.73(a)(2)(v)(D). The performance issue related to this event was discussed in NRC Inspection Report 05000461/2007007. The NRC issued a Non-Cited Violation associated with a Green inspection finding for the licensee's failure to assure that activities affecting quality were accomplished in accordance with prescribed documented instructions, procedures, or drawings. The inspectors determined that the information provided in LER 05000461/2007-002-00 did not raise any new issues or change the conclusions of the previous review. LER 05000461/2007-002-00 is closed.

This inspection constituted one event follow-up inspection sample as defined by Inspection Procedure 71153.

4OA5 Other Activities

.1 Quarterly Resident Inspector Observations of Security Personnel and Activities

a. Inspection Scope

During the inspection period, the inspectors conducted the following observations of security force personnel and activities to ensure that the activities were consistent with licensee security procedures and regulatory requirements relating to nuclear plant security. These observations took place during both normal and off-normal plant working hours.

- Multiple tours of operations within the security alarm stations;
- Tours of selected security officer response posts;
- Direct observation of personnel entry screening operations within the plant's Main Access Facility; and
- Security force shift turnover activities.

These quarterly resident inspector observations of security force personnel and activities did not constitute any additional inspection samples. Rather, they were considered an integral part of the inspectors' normal plant status review and inspection activities.

b. Findings

No findings of significance were identified.

.2 Review of Institute of Nuclear Power Operations (INPO) Assessment Report

The inspectors completed a review of the preliminary INPO evaluation for the Clinton Power Station assessment conducted in October/November 2008. During this review, the inspectors did not identify any new safety significant issues.

4OA6 Management Meetings

.1 Resident Inspectors' Exit Meeting

The inspectors presented the inspection results to Mr. F. Kearney and other members of the licensee's staff at the conclusion of the inspection on April 9, 2009. The licensee acknowledged the findings presented. Proprietary information was examined during this inspection, but is not specifically discussed in this report.

.2 Interim Exit Meetings

Interim exit meetings were conducted for:

- Radioactive Material Processing and Transportation Inspection with Mr. F. Kearney and other members of the licensee's staff on January 9, 2009. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

R. Chickering, Corrective Action Program Administrator
T. Conner, Operations Director
A. Darelius, Emergency Planning Manager
J. Domitrovich, Maintenance Director
J. Ellis, Work Management Director
R. Frantz, Regulatory Assurance
M. Otten, Operations Training Manager
M. Kanavos, Plant Manager
F. Kearney, Site Vice President
J. Peterson, Regulatory Assurance
M. Reandeau, Shift Operations Superintendent
J. Stovall, Radiation Protection Manager
J. Ufert, Fire Marshall
C. VanDenburgh, Nuclear Oversight Manager
M. Vandermyde, Reactor Engineering Supervisor
R. Weber, Engineering Director
C. Williamson, Security Manager

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened

None		

Closed

05000461/2007-002-00	LER	Improper Installation of Stanchions in Containment Pool Swell Zone (Section 40A3.1)

Discussed

None		

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1R04 Equipment Alignment

- CPS 3203.01V001, "Component Cooling Water Valve Lineup," Revision 18e
- CPS 3203.01E001, "Component Cooling Water Electrical Lineup," Revision 17a
- CPS 3203.01, "Component Cooling Water (CC)," Revision 32b
- CPS 3319.01E001, "Standby Gas Treatment Electrical Lineup," Revision 10c
- CPS 3319.01V001, "Standby Gas Treatment Valve Lineup," Revision 8
- CPS 3319.01, "Standby Gas Treatment," Revision 16
- M05-1105, "P&ID Standby Gas Treatment System," Sheet 1, Revision S
- M05-1105, "P&ID Standby Gas Treatment System," Sheet 2, Revision N
- M05-1105, "P&ID Standby Gas Treatment System," Sheet 3, Revision F
- CPS 3312.01D001, "Residual Heat Removal Electrical Lineup," Revision 14
- CPS 3312.01V001, "Residual Heat Removal Valve Lineup," Revision 16b
- CPS 3312.01V002, "Residual Heat Removal Instrumentation Valve Lineup," Revision 9
- M05-1075, "P&ID Residual Heat Removal," Sheet 1, Revision AW
- M05-1075, "P&ID Residual Heat Removal," Sheet 2, Revision AM
- M05-1075, "P&ID Residual Heat Removal," Sheet 3, Revision AG
- M05-1075, "P&ID Residual Heat Removal," Sheet 4, Revision AF
- CPS 3309.01V001, "High Pressure Core Spray Valve Lineup," Revision 11A
- CPS 3309.01, "High Pressure Core Spray," Revision 16

1R05 Fire Protection

- CPS 1893.04M340, "762 Control (CB-1f)," Revision 5
- Drawing M01-1107 Sheet 6, "Figure FP-12b, Fire Protection Features, Control & Diesel Generator Building Mezzanine Floor Plan – El. 762'-0"," Revision 10
- CPS FP Report – (M01-1107, Sheet 6 of 7), "Figure 10 – Cable Tray, General Arrangement, Control & Diesel Generator Building Mezzanine Floor Plan – El. 762'-0"," Revision 12
- CPS 1893.04M355, "781 Control (East): Unit 2 Area (CB-1g)," Revision 5
- Drawing M01-1109 Sheet 3, "Figure FP-13b, Fire Protection Features, Control Building Floor Plan – El. 781'-0"," Revision 10
- CPS FP Report – (M01-1109, Sheet 3 of 9), "Figure 11 – Cable Tray, General Arrangement, Control Building Floor Plan – El. 781'-0"," Revision 7
- CPS UFSAR, Appendix E, "FP Evaluation Report – CPS Unit 1," Revision 11
- CPS 1893.04M355, "781 Control: Unit 2 Area Prefire Plan," Revision 5
- CPS 1893.04M340, "762 Control: General Area Prefire Plan," Revision 5
- AR 00875719, "NRC Identified Cables Coiled Up and Left Under Cable Tray"
- AR 00875726, "Residual Penetration Sleeves on FP Pipe Unit 2 781 CB"
- IP-M-0177, Fire Loading Calculation, Revision 6
- OP-AA-201-009, "Control of Transient Combustible Material," Revision 8
- CPS Updated Final Safety Analysis Report, Appendix E, "Fire Protection Evaluation Report – CPS Unit 1," Revision 11

- CPS 1893.04M121, "762 Auxiliary (East): Containment Electrical Penetrations Prefire Plan," Revision 4
- CPS 1893.04M123, "762 Auxiliary (West): Containment Electrical penetrations Prefire Plan," Revision 4
- Figure FP-4a, "Auxiliary Fuel Building and Containment Mezzanine Floor Plan EL. 755'-0" & 762'-0", Revision 7
- CPS 1893.04M134, "781 Auxiliary (East): Division 1 Battery Room Prefire Plan," Revision 4
- CPS 1893.04M135, "781 Auxiliary (West): Division 2 Battery Room Prefire Plan," Revision 5
- AR 00891668, "NRC Issues from Plant Tour of 3/11/09"

1R12 Maintenance Effectiveness (71111.12)

- ER-AA-310-1001, "Maintenance Rule – Scoping," Revision 3
- Maintenance Rule Scoping Document, "Diesel Generators," March 2009
- Maintenance Rule Reliability Data for Diesel Generator System, March 2009
- System Monitoring Basis Form, March 2009
- Diesel Generator System Health Report, 4th Quarter 2008
- AR 00585986, "1PIDG306: Out of Spec Readings on Division 1 DG Data"
- AR 00857457, "PES-P-006 is in Conflict with Tech Specs"
- AR 00695618, "1DG01KC: Division 3 DG Low Oil Reservoir Level"
- Maintenance Rule Scoping Document, "Reactor Recirculation System," February 20, 2009
- Maintenance Rule Reliability Data for Reactor Recirculation System," February 20, 2009
- AR 00796718, "NRC Identified Reactor Recirculation Pump Trip on 2/10/08 As Maintenance Rule Failure"
- AR 00729248, "1H13-P680: Reactor Recirculation Pump A Fail to Start"
- AR 00730924, "1B33-F060A Will Not Change Position for Controller"

1R13 Maintenance Risk Assessments and Emergent Work Control

- CPS 3319.01V001, "Standby Gas Treatment Valve Lineup," Revision 8
- MS-08.00, "Lubrication Level of Rotating Equipment," Revision 4
- Maintenance activity scheduled from March 2, 2009 through March 6, 2009.
- OP-AA-1-1-113-1004, "Guidelines for the Morning Plant Status Reports," Revision 13
- WC-AA-101, "On-Line Work Control Process," Revision 14
- WC-AA-101-1002, "On-Line Scheduling Process," Revision 7
- AR 00883489, "ERAT SVC Tripped"
- AR 00883506, "Loss of Power EOF"
- AR 00883561, "No Procedure For Operating the TSC Diesel Generator"
- AR 00883613, "ERAT SVC Cooling Skid Was Still Running Following SVC Trip"
- AR 00883713, "3505.01 Enhancement"
- AR 00883756, "ERAT/RAT LCO's – Post C1R12 Configuration"
- AR 00883761, "0AP95E: ERAT Circuit Switcher Interlock Mechanically Bound"
- AR 00883796, "ERAT SVC Startup Unsuccessful"
- AR 00883824, "0AP117E-A49CA New Card From Stores Needs Programmed to Work"
- AR 00883926, "Evaluate the Need for More Testing/Monitoring of ERAT/SVC"

1R15 Operability Evaluations

- Operational Technical Decision Making (OTDM) 864500, "Unexplained ABST Temperature and Beta Increase"
- OP-AA-106-101-1006, "Operational and Technical Decision Making Process," Revision 6

- AR 00864500, "ABST Temperature Shows a Step Change and Increasing Trend:
- AR 00867426, "Increased In-Leakage Into Aux Bldg Floor Drain Tank (1RF05T)"
- AR 00879070, "Loop Seal Did Not Fill As Expected"
- AR 00880185, "Identified Water On Floor In ABST Using Camera"
- AR 00889121, "NOS-ID: OPS CPA – OTDM Issues"
- Clinton Power Station Updated Final Safety Analysis Report, Chapter 15, "Accident Analyses," Revision 11
- AR 00877517, "Missed Opportunities for Documenting Past Operability Review"
- AR 00814191, "Six Bolt Assemblies Are Missing from Penetration 1EE44E"
- Equipment Qualification Impact Assessment, "Six Out of Twelve Bolts Securing the Outboard Electrical Enclosure to the Containment Penetration Were Found Missing," September 8, 2008
- AR 00878834, "NRC Concerns About Operability Test of Valve 0VC022A"
- AR 00872963, "0VC022A Open Stroke Time Outside Acceptance Criteria"
- AR 00890462, "Nuclear Oversight Identified Key Probabilistic Risk Assessment Operator Actions Not Directly Supported by Procedures"
- Work Order 01181604, "9170.02A20 OP VC A Valve Operability," January 28, 2009
- CPS 9170.02, "Control Room HVAC Chilled Water Valve Operability Test," Revision 31C
- EC 374165, "0VC022A Stroke Evaluation," Revision 0

1R18 Plant Modifications

- EC 349235, "Replace Division 1 Diesel Generator Governor Actuators," Revision 0
- Work Order 00729382, "Install EC 349235 – Replacement Governors Div 1 DG," September 7, 2006
- 50.59 Screening Number: CL-2005-S-932, "Activity/Document Number: EC 349235 and EC 355405 Revision Number: 0," Revision 0
- AR 196340, "No Spares of Obsolete Governor/Actuators for DG Units"
- AR 220054, "Actuator Replacement for DG 1A in WW0440 at Risk"
- Product Specification 82543, "Woodward EGB-10P, -13P, -35P Governor/Actuator," Revision E
- Woodward Manual 82340, "EGB – Proportional Governor/Actuator With Hydraulic Amplifier Systems," Revision C
- AR 193155, "New 2301A Governor Speed Controller"
- AR 76854, "10CFR21-0082 Rev. 2 Report by Engine systems Inc. Identified"
- EC 372721, Revision 0, "Install Shim on Sid of Valve Limit Switch Actuator to Provide Additional Travel for Limit Switch #5 on 1B21F028A"
- WO 011325413, "B21-F028A outboard MSIV RPS trip did not reset"
- CC-AA-112, "Temporary Configuration Changes," Revision 12
- EC 369695, "Remove Nuisance Alarm Input to Annunciator Window 5012-6B," Revision 0
- CPS 5012.06, "Alarm Panel 5012 Annunciator – Row 6," Revision 23b
- Work Order 01107018-02, "EM Implement TCCP EC 369695," April 17, 2008
- Annunciator Log, "5012-6B MCR Annunciator Trip 125V DC MCC 1F Breaker Is Partially Disabled," March 2009

1R19 Post Maintenance Testing

- CPS 9070.01, "Control Room HVAC Air Filter Package Operability Test Run," Revision 26c
- WO 01028906-01, "IM Perform 0VC072 Loop Calibration (8801.02)," November 17, 2008
- AR 00873512, "As Found Instrument Out of Cal. As Left Out of Cal."
- WO 01011353, "Division I Standby Gas Room Cooler Clean And Inspect And Service Water Flange Replacement"

- AR 00888290, "Eddy Current Testing Schedule Delays"
- AR 00888282, "Flange Faces Do Not Meet CC-AA-407 Acceptance"
- AR 00888270, "Redundant Dump Valve Was Found Leaking at Diaphragm"
- AR 00868401, "1VP10FB Failed PMT"
- CPS 3320.01P001, "
- CPS 9843.02, "Operational Pressure Testing of Class 1, 2 and 3 Systems," Revision 40
- ER-AA-335-015, "VT-2 Visual Examination," Revision 9
- AR 00883579, "1VX06CC Condenser End Bell Leaking SX Water"
- CPS 3503.01C006, "Class 1E Swing Battery Charger 1DC11E Feed To Safety-related DC Bus Checklist," Revision 4e
- CPS 9382.11, "Division IV 125VDC Battery Charger Load Test," Revision 29
- WO 00848143, "OP PMT-Restore From Swing Charger"
- AR 00882390, "NRC Comment: CPS 3503.01C006 Needs Minor Revisions, 1DC08E"

1R22 Surveillance Testing

- Clinton Power Station Technical Specifications
- CPS 9052.01, "LPCS/RHR A Pumps & LPCS/RHR A Water Leg Pump Operability," Revision 44b
- CPS 9831.01C001, "Whole Core LPRM Calibration Checklist," Revision 27c
- CPS 9831.01, "LPRM Calibration" Revision 38c
- CPS 9080.01, "Diesel Generator 1A Operability – Manual and Quick Start Operability," Revision 51a
- HU-AA-1211, "Briefings-Pre-Job, Heightened Level of Awareness, Infrequent Plant Activity and Post-Job Briefings," Revision 4
- CPS 3506.01D001, "Diesel Generator 1A Operating Logs," Revision 1b
- CPS 3506.01C001, "Diesel Generator 1A Pre-Start Checklist," Revision 14
- CPS 9051.01, "HPCS Pump and HPCS Water Leg Pump Operability," Revision 42c
- CPS 9051.01D001, "HPCS Pump and HPCS Water Leg Pump Operability Data Sheet," Revision 43b
- AR 00483106, "Pressure Increase Due To Internal Leakby Of Check Valves"
- WO 01179728, "9051.01R22 OP HPCS Pump & Water Leg Pump Operability"
- AR 00866844, "System Manager Found ERAT SVC Harmonic Relay B Off"
- CPS 9069.02, "Shutdown Service Water Valve Operability Test," Revision 32c
- CPS 9031.06, "Main Turbine Stop Valve and Combined Intermediate Valve Tests," Revision 34a
- CPS 9031.07, "Main Turbine Control Valve Tests," Revision 32
- AR 00886672, "CIV #2 Showed Closed On DCS During CIV #3 Testing (9031.06)"
- AR 00886675, "Alarm 5019-6B Received During Valve Testing 9031.06"
- AR 00889391, "NOS ID Eval of Potentially Degraded Equipment Not Performed"
- CPS 9000.01D001, "Control Room Surveillance Log – Mode 1, 2, 3 Data Sheet," Revision 52a
- CPS 9813.01, "Control Rod Scram Time Testing," Revision 38a
- CPS 9813.01C001, "Control Rod Scram Time Testing Checklist," Revision 32c

2PS2 Radioactive Material Processing and Transportation (71122.02)

- AR 699085, "Focused Area Self-Assessment: Satellite Radiologically Controlled Areas and Contaminated Equipment Storage Areas"
- AR 708227, "Found Contamination on Shipment of Vendor Equipment"
- AR 714058, "Unhappy with Resolution to AR 708227"
- AR 744624, "Gap With Fuel Pool Clean-up Planning, Lack of Radioactive Material Shippers"

- AR 753986, "TN RAM Number Three Shipment Delayed"
- AR 785639, "Notification from Quad Cities of Contamination Found on Radioactive Material Trailer"
- AR 814013, "Water Still Found in Sealand During Inspection"
- AR 838690-03, "Focused Area Self-Assessment: Radioactive Material Processing and Transportation"
- AR 844563, "Radwaste Long Term Storage Area Trench Drain Deficiency"
- AR 844598, "Radwaste Long Term Storage Area Deficiency"
- AR 851287, "Discrepancies Identified During Container Inspection"
- AR 862194, "Sealand Storage Pad Needs Pugs in Drains"
- CPS 1019.05, "Transient Equipment/Materials," Revision 15
- CPS 3909.1, "Operating Spent Resin System," Revision 22a
- CPS 3909.2, "Operating Phase Separators," Revision 21a
- CPS 3909.3, "Operating Waste Sludge System," Revision 20d
- CPS 3909.4, "Operating Concentrate Waste System," Revision 15b
- CPS 3909.0, "Operation Fuel Pool Filter Demineralizer Sludge System," Revision 12c
- EC 372157, "Engineering Change; Installation of a Diaphragm Pump to Transfer Resin/Charcoal From the Spent Resin Tank to the Vendor for Radwaste Processing," September 17, 2008
- EC 372605, "Temporary Cooling Skid for Turbine Building Equipment Drain Tank," November 13, 2008
- RP-AA-602, "Packaging of Radioactive Material Shipments," Revision 12
- RP-AA-603, "Inspection and Loading of Radioactive Material Shipments," Revision 3
- RP-AA-605, "10 CF Part 61 Program," Revision 1
- RW-AA-100, "Process Control Program for Radioactive Wastes," Revision 7
- Updated Safety Analysis Report, "Section 11.4; Solid Waste Management System," Revision 11

40A1 Performance Indicator Verification (71151)

- Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5

LIST OF ACRONYMS USED

ADAMS	Agency-wide Documents and Management System
AR	Action Request
CC	Component Cooling Water
CFR	Code of Federal Regulations
CIV	Combined Intermediate Valve
CNO	Chief Nuclear Officer
CPS	Clinton Power Station
DOT	Department of Transportation
EC	Engineering Change
HPCS	High Pressure Core Spray
IMC	Inspection Manual Chapter
INPO	Institute of Nuclear Power Operations
LER	Licensee Event Report
LPCS	Low Pressure Core Spray
LPRM	Low Power Range Monitor
NRC	U.S. Nuclear Regulatory Commission
OTDM	Operational Technical Decision Making
PARS	Publicly Available Records
radwaste	Radioactive Waste
RHR	Residual Heat Removal
RP	Radiation Protection
SSCs	Structures, Systems and Components
TS	Technical Specification
UFSAR	Updated Final Safety Analysis Report