



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

November 5, 2009

Mr. Edward D. Halpin,
Executive Vice President and Chief Nuclear Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

Subject: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION - NRC INTEGRATED
INSPECTION REPORT 05000498/2009004 AND 05000499/2009004

Dear Mr. Halpin:

On October 3, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your South Texas Project Electric Generating Station, Units 1 and 2, facility. The enclosed integrated inspection report documents the inspection findings, which were discussed on October 8, 2009, with Mr. J. Sheppard, President and Chief Executive Officer, and other members of your staff.

The inspections 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.

This report documents one NRC-identified finding of very low safety significance (Green), which was determined to involve a violation of NRC requirements. However, because of the very low safety significance and because it was entered into your corrective action program, the NRC is treating this finding as a noncited violation, consistent with Section VI.A.1 of the NRC Enforcement Policy. If you contest this violation or the significance of the noncited violation, 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, U.S. Nuclear Regulatory Commission, Region IV, 612 E. Lamar Blvd, Suite 400, Arlington, Texas, 76011-4125; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the South Texas Project Electric Generating Station, Units 1 and 2, facility. In addition, if you disagree with the characterization of any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region IV, and the NRC Resident Inspector at the South Texas Project Electric Generating Station, Units 1 and 2, facility. The information you provide will be considered in accordance with Inspection Manual Chapter 0305.

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and its enclosure, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records 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).

Sincerely,

/RA/

Wayne Walker, Chief
Project Branch A
Division of Reactor Projects

Dockets: 50-498
50-499
Licenses: NPF-76
NPF-80

Enclosure:
NRC Inspection Report 05000498/2009004 and 05000499/2009004
w/Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 05000498, 05000499

License: NPF-76, NPF-80

Report: 05000498/2009004 and 05000499/2009004

Licensee: STP Nuclear Operating Company

Facility: South Texas Project Electric Generating Station, Units 1 and 2

Location: FM521 - 8 miles west of Wadsworth
Wadsworth, Texas 77483

Dates: July 5 through October 3, 2009

Inspectors: J. Dixon, Senior Resident Inspector
B. Hagar, Senior Project Engineer
B. Tharakan, CHP, Resident Inspector

Approved By: Wayne Walker, Chief, Project Branch A
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000498/2009004, 05000499/2009004; 07/05/2009 – 10/03/2009; South Texas Project Electric Generating Station, Units 1 and 2, Integrated Resident and Regional Report; Operability Evaluations.

The report covered a 3-month period of inspection by resident inspectors and an announced baseline inspection by regional based inspectors. One Green noncited violation of significance was identified. 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 4, dated December 2006.

A. NRC-Identified Findings and Self-Revealing Findings

Cornerstone: Mitigating Systems

- Green. The inspectors identified an inadequate reportability review that resulted in a Green noncited violation of Technical Specification 3.7.14 because the licensee had two independent loops of essential chilled water system inoperable for longer than the allowed outage time. The licensee's reportability review failed to identify that the train B essential chilled water system was inoperable because the oil reservoir temperature was below the required value while the train C essential chilled water system was inoperable for planned maintenance. The licensee concluded that even though the chiller was inoperable, it was not reportable because the time it took to repair was less than the technical specification allowed outage time, however, the inspectors identified that essential chiller 12B oil reservoir temperature was below the required value. Consequently the inspectors continued to ask the licensee questions regarding the lower limit for the oil reservoir temperature and why the chiller was not considered inoperable from the time it was secured. As a result of this observation, the licensee performed another operability and reportability review and determined that the issue was reportable for having two loops of the essential chilled water system inoperable for longer than the technical specification allowed outage time.

The finding was more than minor because it affected the Mitigating Systems Cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using the Significance Determination Process Phase 1 worksheets from Inspection Manual Chapter 0609, the finding was determined to have very low safety significance because it was not a design or qualification deficiency, did not represent a loss of system safety function, did not represent actual loss of a single train for greater than the technical specification allowed time, and did not screen as risk significant due to seismic, flooding, or severe weather. In addition, this

finding had human performance crosscutting aspects associated with decision making in that the licensee did not use conservative assumptions in decision making and did not conduct effectiveness reviews of safety-significant decisions to verify the validity of the underlying assumptions [H.1(b)](Section 1R15).

B. Licensee-Identified Violations

None

REPORT DETAILS

Summary of Plant Status

Unit 1 began the inspection period at 100 percent rated thermal power and remained there until September 18, 2009, at which time Unit 1 entered coastdown operations in preparation for Refueling Outage 1RE15. On September 30, 2009, Unit 1 shut-down and commenced Refueling Outage 1RE15.

Unit 2 began the inspection period at 100 percent rated thermal power and remained there until September 17, 2009, at which time Unit 2 commenced a plant shutdown to repair multiple failed condenser extraction steam bellows. On September 27, 2009, Unit 2 completed the repairs and commenced a reactor startup. On September 28, 2009, Unit 2 closed the main generator output breaker and on September 29, 2009, achieved 100 percent rated thermal power and remained there for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

1R01 Adverse Weather Protection (71111.01)

Readiness to Cope with External Flooding

a. Inspection Scope

The inspectors evaluated the design, material condition, and procedures for coping with the design basis probable maximum flood. The evaluation included a review to check for deviations from the descriptions provided in the UFSAR for features intended to mitigate the potential for flooding from external factors. As part of this evaluation, the inspectors checked for obstructions that could prevent draining, checked that the roofs did not contain obvious loose items that could clog drains in the event of heavy precipitation, and determined that barriers required to mitigate the flood were in place and operable. Additionally, the inspectors performed a walkdown of the protected area to identify any modification to the site that would inhibit site drainage during a probable maximum precipitation event or allow water ingress past a barrier. The inspectors also reviewed the abnormal operating procedure for mitigating the design basis flood to ensure it could be implemented as written. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one external flooding sample as defined in Inspection Procedure 71111.01-05.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignments (71111.04)

Partial Walkdown

a. Inspection Scope

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

- August 28, 2009, Unit 1, essential cooling water system train A
- September 11, 2009, Unit 2, auxiliary feedwater system train C
- October 1, 2009, Unit 2, standby diesel generator train C

The inspectors selected these systems based on their risk significance relative to the reactor safety cornerstones at the time they were inspected. The inspectors attempted to identify any discrepancies that could affect the function of the system, and, therefore, potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, UFSAR, technical specification requirements, administrative technical specifications, outstanding work orders, condition reports, and the impact of ongoing work activities on redundant trains of equipment in order to identify conditions 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 and support equipment were aligned correctly and operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no obvious deficiencies. The inspectors also verified that the licensee had properly identified and resolved equipment alignment problems that could cause initiating events or impact the capability of mitigating systems or barriers and entered them into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of three partial system walkdown samples as defined in Inspection Procedure 71111.04-05.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Quarterly Fire Inspection Tours

a. Inspection Scope

The inspectors conducted fire protection walkdowns that were focused on availability, accessibility, and the condition of firefighting equipment in the following risk-significant plant areas:

- August 19, 2009, Units 1 and 2, train B standby diesel generator fuel oil storage tank room, Fire Zone Z504
- August 21, 2009, Units 1 and 2, train A standby diesel generator fuel oil storage tank room, Fire Zone Z505
- August 21, 2009, Units 1 and 2, train C standby diesel generator fuel oil storage tank room, Fire Zone Z503
- August 21, 2009, Units 1 and 2, standby diesel generator building air intake and exhaust train B, Fire Zone Z513

The inspectors reviewed areas to assess if licensee personnel had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant; effectively maintained fire detection and suppression capability; maintained passive fire protection features in sound material condition; and had implemented adequate compensatory measures for out-of-service, degraded or inoperable fire protection equipment, systems, or features, in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall contribution to internal fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to affect equipment that could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the attachment, 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; and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's corrective action program. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four quarterly fire protection inspection samples as defined in Inspection Procedure 71111.05-05.

b. Findings

No findings of significance were identified.

.2 Annual Fire Protection Drill Observation (71111.05A)

a. Inspection Scope

On September 15, 2009, the inspectors observed fire brigade activation due to a simulated fire inside a charcoal filtration unit of the technical support center ventilation system in Room 514 of the Unit 1 electrical auxiliary building. The observation evaluated the readiness of the plant fire brigade to fight fires. The inspectors verified that the licensee staff identified deficiencies, openly discussed them in a self-critical manner at the drill debrief, and took appropriate corrective actions. Specific attributes

evaluated were: (1) proper wearing of turnout gear and self-contained breathing apparatus; (2) proper use and layout of fire hoses; (3) employment of appropriate firefighting techniques; (4) sufficient firefighting equipment brought to the scene; (5) effectiveness of fire brigade leader communications, command, and control; (6) search for victims and propagation of the fire into other plant areas; (7) smoke removal operations; (8) utilization of preplanned strategies; (9) adherence to the preplanned drill scenario; and (10) drill objectives.

These activities constitute completion of one annual fire-protection inspection sample as defined in Inspection Procedure 71111.05-05.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification Program (71111.11)

a. Inspection Scope

On July 22, 2009, the inspectors observed a crew of licensed operations personnel in the plant's simulator to verify that operator performance was adequate, evaluators were identifying and documenting crew performance problems, and training was being conducted in accordance with licensee procedures. The inspectors evaluated the following areas:

- Licensed-operator performance
- Crew's clarity and formality of communications
- Crew's ability to take timely actions in the conservative direction
- Crew's prioritization, interpretation, and verification of annunciator alarms
- Crew's correct use and implementation of abnormal and emergency procedures
- Control board manipulations
- Oversight and direction from supervisors
- Crew's ability to identify and implement appropriate technical specification actions and emergency plan actions and notifications

The inspectors compared the crew's performance in these areas to pre-established operator action expectations and successful critical task completion requirements.

These activities constitute completion of one quarterly licensed-operator requalification program sample as defined in Inspection Procedure 71111.11.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

The inspectors evaluated degraded performance issues involving the following risk-significant systems:

- September 30, 2009, Units 1 and 2, auxiliary feedwater system

The inspectors reviewed events such as where ineffective equipment maintenance has resulted in valid or invalid automatic actuations of engineered safeguards systems, and independently verified the licensee's actions to address system performance or condition problems in terms of the following:

- Implementing appropriate work practices
- Identifying and addressing common cause failures
- Scoping of systems in accordance with 10 CFR 50.65(b)
- Characterizing system reliability issues for performance
- Charging unavailability for performance
- Trending key parameters for condition monitoring
- Ensuring proper classification in accordance with 10 CFR 50.65(a)(1) or (a)(2)
- Verifying appropriate performance criteria for structures, systems, and components classified as having an adequate demonstration of performance through preventive maintenance, as described in 10 CFR 50.65(a)(2), or as requiring the establishment of appropriate and adequate goals and corrective actions for systems classified as not having adequate performance, as described in 10 CFR 50.65(a)(1)

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the system. In addition, the inspectors verified maintenance effectiveness issues were entered into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one quarterly maintenance effectiveness sample as defined in Inspection Procedure 71111.12-05.

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

The inspectors reviewed licensee personnel's evaluation and management of plant risk for the 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:

- June 10, 2009, Unit 1, thermal power impacts from isolation of all trains of steam generator blowdown and simultaneous use of U1118 thermal power calculator
- Week of September 28, 2009, Units 1 and 2, planned maintenance activities on Unit 1 train B during coastdown operations and pre-outage activities in preparation for Refueling Outage 1RE15, and start up of Unit 2 after a shutdown to repair multiple condenser extraction steam bellows

The inspectors selected these activities based on potential risk significance relative to the reactor safety cornerstones. As applicable for each activity, the inspectors verified that licensee personnel performed risk assessments as required by 10 CFR 50.65(a)(4) and that the assessments were accurate and complete. When licensee personnel performed emergent work, the inspectors verified that the licensee personnel promptly assessed and managed plant risk. The inspectors reviewed the scope of maintenance work, discussed the results of the assessment with the licensee's probabilistic risk analyst or shift technical advisor, and verified plant conditions were consistent with the risk assessment. The inspectors also reviewed the technical specification requirements and inspected portions of redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two maintenance risk assessments and emergent work control inspection samples as defined in Inspection Procedure 71111.13-05.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following issues:

- July 9, 2009, Units 1 and 2, isolation valve cubicle high temperature alarms in excess of 104°F
- July 16, 2009, Unit 2, steam generator power operated relief valve 2A amplifier card solder joint that did not pass inspection criteria
- July 23, 2009, Unit 1, essential chiller 12B oil reservoir below required temperature
- August 13, 2009, Units 1 and 2, response time testing of Rosemount transmitters not in accordance with license amendment
- September 18, 2009, Unit 1, analog channel operational test for loop RC-T-0410 failed the over temperature delta temperature bistable verification test

The inspectors selected these potential operability issues based on the risk significance of the associated components and systems. The inspectors evaluated the technical adequacy of the evaluations to ensure that technical specification operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the technical specifications and UFSAR to the licensee's evaluations, to determine whether the components or systems were operable. 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. Additionally, the inspectors also reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of five operability evaluations inspection samples as defined in Inspection Procedure 71111.15-05.

b. Findings

Introduction. The inspectors identified an inadequate reportability review that resulted in a Green noncited violation of Technical Specification 3.7.14 because the licensee had two independent loops of essential chilled water system inoperable for longer than the allowed outage time. The licensee's reportability review failed to identify that the train B essential chilled water system was inoperable because the oil reservoir temperature was below the required value while the train C essential chilled water system was inoperable for planned maintenance.

Description. During the February 16, 2009, work week, a design change was implemented on essential chiller 12B to adjust the oil heater thermostat setpoint from 150±5°F to 135±5°F. This setpoint change was implemented to gain additional margin from low pressure trips during chiller starts, after the change maintenance returned the chiller back to operations, and operations declared the chiller operable. At 1:51 p.m. on

February 24, 2009, the licensee secured the chiller 12B to support planned maintenance on essential chiller 12C. Later that day, the licensee discovered the oil reservoir temperature was below the required temperature. The licensee replaced the thermostat for chiller 12B and concluded that even though the chiller was inoperable, it was not reportable because of the use of 'time of discovery' - the time between when the temperature was identified below the required value to the time it was repaired was less than the technical specification allowed outage time.

The licensee performed failure analysis of the thermostat and determined that it was working as expected with no anomalies. Subsequently, the licensee revised the apparent cause evaluation for essential chiller 12B low oil reservoir temperature, but, again concluded that while the chiller was inoperable, it was not reportable, using the 'time of discovery' logic. The inspectors continued to ask the licensee questions regarding the lower limit of the oil reservoir temperature for operability and why the chiller was not considered inoperable from the time it was secured. The inspectors walked down the essential chillers and identified that essential chiller 12B oil reservoir temperature was at 108°F, which was significantly below the minimum log value of 128°F. As a result of this observation, and continued questioning by the inspectors, the licensee performed another operability and reportability review. As part of the review the licensee contacted the vendor to ask for further clarifying guidance and was informed that the oil reservoir temperature should be kept above 110°F to ensure reliable starts. As a result, the licensee determined essential chiller 12B had been inoperable from the time it was secured for train maintenance at 1:51 p.m. This was different from the previously used 'time of discovery,' of February 24, 2009, at 10:28 p.m. Separately, essential chiller 12C was removed from service for planned maintenance on February 23, 2009, at 4:00 a.m., until 9:26 p.m. on February 24, 2009. Therefore, on February 24, 2009, from 1:51 p.m. until 9:26 p.m., 7 hours and 35 minutes, two trains of essential chilled water were inoperable without the appropriate technical specification actions being taken. Subsequently, the licensee submitted a licensee event report to document the technical specification violation, see Section 4OA3. The inspectors identified that a significant contributor to the finding was the licensee failing to verify their assumptions during the initial assessment and also during the subsequent technical review.

Analysis. The inspectors determined that the failure to perform an adequate reportability review for the oil reservoir temperature below the required value was a performance deficiency. The finding was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of human performance and affected the objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using the Significance Determination Process Phase 1 worksheets from Inspection Manual Chapter 0609, the finding was determined to have very low safety significance (Green) because it was not a design or qualification deficiency, did not represent a loss of system safety function, did not represent actual loss of a single train for greater than the technical specification allowed time, and did not screen as risk significant due to seismic, flooding, or severe weather. In addition, this finding had human performance crosscutting aspects associated with decision making in that the licensee did not use conservative

assumptions in decision making and did not conduct effectiveness reviews of safety-significant decisions to verify the validity of the underlying assumptions [H.1(b)].

Enforcement. Technical Specification 3.7.14 requires, in part, that three independent essential chilled water system loops shall be operable during Modes 1, 2, 3, and 4 operations, and with two or more loops inoperable, within 1 hour restore at least two loops, or apply the Configuration Risk Management Program, or be in hot standby within the next 6 hours. Contrary to the above, on February 24, 2009, the licensee operated with two loops inoperable for greater than one hour, 7 hours and 35 minutes, without taking the appropriate measures listed in the technical specification. Since this violation is of very low safety significance and was documented in the licensee's corrective action program as Condition Reports 09-2976 and 09-8980, it is being treated as a noncited violation consistent with Section VI.A.1 of the NRC Enforcement Policy: NCV 05000498/2009004-01, "Inadequate Reportability Results in Two Trains of the Essential Chilled Water System Being Inoperable."

1R18 Plant Modifications (71111.18)

a. Inspection Scope

The inspectors reviewed the following temporary modifications to verify that the safety functions of important safety systems were not degraded:

- T2 08-18901-1, Core Exit Thermocouple (CET) C2IITE0039, and T2 09-12727-3, Disable Core Exit Thermocouple (CET) A2IITE0009

The inspectors reviewed the temporary modification and the associated safety evaluation screening against the system design bases documentation, including the UFSAR and the technical specifications, and verified that the modification did not adversely affect the system operability/availability. The inspectors also verified that the installation and restoration were consistent with the modification documents and that configuration control was adequate. Additionally, the inspectors verified that the temporary modification was identified on control room drawings, appropriate tags were placed on the affected equipment, and licensee personnel evaluated the combined effects on mitigating systems and the integrity of radiological barriers. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one sample for temporary plant modifications as defined in Inspection Procedure 71111.18-05.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed the following postmaintenance activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

- September 22, 2009, Unit 1, postmaintenance tests on residual heat removal train C, after inspection, disassembly, and repair of leaks on residual heat removal system return to the refueling water storage tank isolation valve, pump 1C discharge flow transmitter high side root valve, pump 1C discharge check valve, and pump 1C suction flange gasket replacement
- September 24, 2009, Unit 1, control room envelope heating, ventilation, and air conditioning testing after control room breaches to perform cable pulls for engineered safety features transformer upgrade
- September 29, 2009, Unit 1, essential chiller 12C, replaced essential chilled water temperature control module due to the failure to maintain chilled water outlet temperature within the required band

The inspectors selected these activities based upon the structure, system, or component's ability to affect risk. The inspectors evaluated these activities for the following (as applicable):

- The effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed
- Acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate

The inspectors evaluated the activities against the technical specifications, the UFSAR, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications to ensure that the test results adequately ensured that the equipment met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with postmaintenance tests to determine whether the licensee was identifying problems and entering them in the corrective action program and that the problems were being corrected commensurate with their importance to safety. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of three postmaintenance testing inspection samples as defined in Inspection Procedure 71111.19-05.

b. Findings

No findings of significance were identified.

1R20 Refueling and Other Outage Activities (71111.20)

.1 Unit 2 Unexpected Shutdown 2P0901 for Condenser Bellows Repairs

a. Inspection Scope

The inspectors reviewed the outage plan for the September 17-29, 2009, Unit 2 unexpected shutdown to repair extraction steam bellows in the main condenser. The inspectors confirmed that licensee personnel had appropriately considered risk, industry experience, and previous site-specific problems in developing and implementing a plan that assured maintenance of defense-in-depth.

During the Unit 2 unexpected shutdown, the inspectors observed portions of the shutdown and cooldown processes and monitored licensee controls over the outage activities listed below.

- Configuration management, including maintenance of defense-in-depth, is commensurate with the outage safety plan for key safety functions and compliance with the applicable technical specifications when taking equipment out-of-service
- Clearance activities, including confirmation that tags were properly hung and equipment appropriately configured to safely support the work or testing
- Monitoring of decay heat removal processes, systems, and components
- Controls over activities that could affect reactivity
- Startup and ascension to full power operation
- Licensee identification and resolution of problems related to outage activities

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one outage inspection sample as defined in Inspection Procedure 71111.20-05.

b. Findings

No findings of significance were identified.

.2 Unit 1 Refueling Outage 1RE15

a. Inspection Scope

The inspectors reviewed the outage plan for the Unit 1 Refueling Outage 1RE15 that began September 30, 2009, and is scheduled to conclude on November 8, 2009. The inspectors confirmed that licensee personnel had appropriately considered risk, industry experience, and previous site-specific problems in developing and implementing a plan that assured maintenance of defense-in-depth. During the Unit 1 refueling outage, the inspectors observed portions of the shutdown and cooldown processes and monitored licensee controls over the outage activities listed below.

- Configuration management, including maintenance of defense-in-depth, is commensurate with the outage safety plan for key safety functions and compliance with the applicable technical specifications when taking equipment out-of-service
- Clearance activities, including confirmation that tags were properly hung and equipment appropriately configured to safely support the work or testing
- Status and configuration of electrical systems to ensure that technical specifications and outage safety-plan requirements were met, and controls over switchyard activities
- Monitoring of decay heat removal processes, systems, and components
- Reactor water inventory controls, including flow paths, configurations, and alternative means for inventory addition, and controls to prevent inventory loss
- Controls over activities that could affect reactivity
- Licensee identification and resolution of problems related to refueling outage activities

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one refueling outage inspection sample as defined in Inspection Procedure 71111.20-05.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the UFSAR, procedure requirements, and technical specifications to ensure that the four surveillance activities listed below demonstrated that the systems, structures, and/or components tested were capable of performing their intended safety functions. The inspectors either witnessed or reviewed test data to verify that the significant surveillance test attributes were adequate to address the following:

- Preconditioning
- Evaluation of testing impact on the plant
- Acceptance criteria
- Test equipment

- Procedures
- Jumper/lifted lead controls
- Test data
- Testing frequency and method demonstrated technical specification operability
- Test equipment removal
- Restoration of plant systems
- Fulfillment of ASME Code requirements
- Updating of performance indicator data
- Engineering evaluations, root causes, and bases for returning tested systems, structures, and components not meeting the test acceptance criteria were correct
- Reference setting data
- Annunciators and alarms setpoints
- Licensee personnel identified and implemented any needed corrective actions associated with the surveillance testing

The following surveillance testing activities were inspected:

- July 14, 2009, Unit 1, centrifugal charging pump 1A inservice test
- August 7, 2009, Unit 1, component cooling water check valve, CC-0123, inside containment isolation valve local leak rate test
- September 2, 2009, Unit 2, component cooling water motor operated valve, CC-MOV-0012, outside containment isolation valve local leak rate test
- September 29 through October 2, 2009, Unit 2, reactor coolant system leakage detection surveillance after startup from forced outage to repair multiple condenser bellows

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four surveillance testing inspection samples as defined in Inspection Procedure 71111.22-05.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

Emergency Preparedness Drill Observation

a. Inspection Scope

The inspectors evaluated the conduct of a routine licensee emergency drill on August 12, 2009, to identify any weaknesses and deficiencies in classification, notification, and protective action recommendation development activities. The inspectors observed emergency response operations in the simulator and the emergency operations facility to determine whether the event classification, notifications, and protective action recommendations were performed in accordance with procedures. The inspectors also attended the licensee drill critique to compare any inspector-observed weakness with those identified by the licensee staff in order to evaluate the critique and to verify whether the licensee staff was properly identifying weaknesses and entering them into the corrective action program.

These activities constitute completion of one sample as defined in Inspection Procedure 71114.06-05.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Data Submission Issue

a. Inspection Scope

The inspectors performed a review of the data submitted by the licensee for the second quarter 2009 performance indicators for any obvious inconsistencies prior to its public release in accordance with Inspection Manual Chapter 0608, "Performance Indicator Program."

This review was performed as part of the inspectors' normal plant status activities and, as such, did not constitute a separate inspection sample.

b. Findings

No findings of significance were identified.

.2 Safety System Functional Failures (MS05)

a. Inspection Scope

The inspectors sampled licensee submittals for the Safety System Functional Failures performance indicator for Units 1 and 2 for the period from the third quarter 2008 through second quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, and NUREG-1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73" were used. The inspectors reviewed the licensee's operator narrative logs, operability assessments, maintenance rule records, maintenance work orders, issue reports, event reports, and NRC integrated inspection reports for the period of July 2008 through June 2009 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified.

These activities constitute completion of one safety system functional failures sample per unit as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.3 Reactor Coolant System Specific Activity (BI01)

a. Inspection Scope

The inspectors sampled licensee submittals for the Reactor Coolant System Specific Activity performance indicator for Units 1 and 2 for the period from the third quarter 2008 through second quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's reactor coolant system chemistry samples, technical specification requirements, issue reports, event reports, and NRC integrated inspection reports for the period of July 2008 through June 2009 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. In addition to record reviews, the inspectors observed a chemistry technician obtain and analyze a reactor coolant system sample.

These activities constitute completion of one reactor coolant system specific activity sample per unit as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.4 Reactor Coolant System Leakage (BI02)

a. Inspection Scope

The inspectors sampled licensee submittals for the Reactor Coolant System Leakage performance indicator for Units 1 and 2 for the period from the third quarter 2008 through second quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's operator logs, reactor coolant system leakage tracking data, issue reports, event reports, and NRC integrated inspection reports for the period of July 2008 through June 2009 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified.

These activities constitute completion of one reactor coolant system leakage sample per unit as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

40A2 Identification and Resolution of Problems (71152)

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness, Public Radiation Safety, Occupational Radiation Safety, and Physical Protection

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As part of the various baseline inspection procedures 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. The inspectors reviewed attributes that included: the complete and accurate identification of the problem; the timely correction, commensurate with the safety significance; the evaluation and disposition of performance issues, generic implications, common causes, contributing factors, root causes, extent of condition reviews, and previous occurrences reviews; and the classification, prioritization, focus, and timeliness of corrective actions. Minor issues entered into the licensee's corrective action program because of the inspectors' observations are included in the attached list of documents reviewed.

These routine reviews for the identification and resolution of problems did not constitute any additional inspection samples. Instead, by procedure, they were considered an integral part of the inspections performed during the quarter and documented in Section 1 of this report.

b. Findings

No findings of significance were identified.

.2 Daily Corrective Action Program Reviews

a. Inspection Scope

In order to assist with the identification of repetitive equipment failures and specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into the licensee's corrective action program. The inspectors accomplished this through review of the station's daily corrective action documents.

The inspectors performed these daily reviews as part of their daily plant status monitoring activities and, as such, did not constitute any separate inspection samples.

b. Findings

No findings of significance were identified.

.3 Selected Issue Follow-up Inspection

a. Inspection Scope

For follow-up inspection of a selected issue, the inspectors selected Condition Report 08-12766, which the licensee had initiated in response to the 2008 Problem Identification & Resolution (PI&R) inspection documented in NRC Inspection Report 05000498/2008009 and 05000499/2008009. Specifically, the inspectors reviewed the licensee's response to statements made in Section 4OA2(b)(2) of that report that relate to employee confidence in the Employee Concerns Program.

These activities constitute completion of one in-depth problem identification and resolution sample as defined in Inspection Procedure 71152-05.

b. Findings

No findings of significance were identified. The inspectors determined that although the subject statements were valid for the subset of the site population that the team interviewed, that subset was not representative of the overall site population, and that result, therefore, does not apply to the overall site.

4OA3 Follow-up of Events and Notices of Enforcement Discretion (71153)

(Closed) LER 05000498/2009-001-00, "Oil Reservoir for Essential Chiller 12B Below Required Temperature"

The inspectors reviewed the events surrounding the essential chiller 12B low out-of-specification oil temperature reading. On February 24, 2009, essential chiller 12B was found to be at 108°F, which was below the minimum temperature of 120°F.

Concurrently with this, the essential chiller 12C was out-of-service for maintenance and this resulted in two trains being inoperable for longer than the technical specification allowed outage time. The inspectors reviewed the licensee's root and apparent cause evaluations of the event, and interviewed the individuals involved to gain an understanding of the conditions surrounding the event. In addition, the inspectors also reviewed the event for reportability in accordance with NUREG 1022, "Event Reporting Guidelines," to ensure the licensee had made the required notifications. The enforcement aspects of this event are documented in Section 1R15 of this report, and in NRC Inspection Report 05000498/2009003 and 05000499/2009003, Section 4OA7. This licensee event report is closed.

4OA5 Other Activities

.1 Quarterly Resident Inspector Observations of Security Personnel and Activities

a. Inspection Scope

During this inspection period, the inspectors performed observations of security force personnel and activities to ensure that the activities were consistent with South Texas Project Electric Generating Station security procedures and regulatory requirements relating to nuclear plant security. These observations took place during both normal and off-normal plant working hours.

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 Licensee Strike Contingency Plans (Inspections Procedure 92709)

a. Inspection Scope

The inspectors evaluated the adequacy of the South Texas Project Nuclear Operating Company Business Disruption Plan. The inspectors verified that the plan could be implemented at anytime after the original contract expiration, July 31, 2009.

b. Findings

No findings of significance were identified.

4OA6 Meetings

Exit Meeting Summary

On October 8, 2009, the inspectors presented the inspection results to Mr. J. Sheppard, President and Chief Executive Officer, and other members of the licensee staff. The licensee

acknowledged the issues presented. The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

J. Ashcraft, Manager, Health Physics
C. Bowman, General Manager Oversight
J. Calvert, Manager, Training
D. Cobb, STP Employee Concerns Program (EAP) Manager
R. Dunn Jr., Supervisor, Configuration Control and Analysis
T. Frawley, Manager, Operations
R. Gangluff, Manager, Chemistry, Environmental and Health Physics
C. Grantom, Manager, PRA
E. Halpin, Executive Vice President and Chief Nuclear Officer
W. Harrison, Manager, Licensing
G. Hildebrant, Manager, Plant Protection
K. House, Manager, Design Engineering
G. Janak, Manager, Operations Division, Unit 1
B. Jenewein, Manager, Systems Engineering
J. Lovejoy, Assistant Maintenance Manager
N. Mayer, Manager, Outage and Projects
A. McGalliard, Manager, Performance Improvement
R. McNiel, Manager, Maintenance Engineering
J. Mertink, Manager, Maintenance
J. Milliff, Manager, Operations Division, Unit 2
J. Paul, Engineer, Licensing Consultant
L. Peter, Plant General Manager
J. Pierce, Manager, Operations Training
G. Powell, Vice President, Engineering
M. Reddix, Manager, Security
D. Rencurrel, Senior Vice President
R. Savage, Engineer, Licensing Staff Specialist
M. Schaefer, Manager, I&C Maintenance
J. Sheppard, President and Chief Executive Officer
K. Taplett, Senior Engineer, Licensing Staff
D. Zink, Supervising Engineer

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000498/2009004-01	NCV	Inadequate Reportability Results in Two Trains of the Essential Chilled Water System Being Inoperable
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Closed

05000498/2009-001-00	LER	Oil Reservoir for Essential Chiller 12B Below Required Temperature
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LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
0PGP03-ZV-0001	Severe Weather Plan	14
0PGP03-ZV-0002	Hurricane Plan	2
0PGP03-ZV-0003	Hurricane Recovery Plan	0
0POP04-ZO-0002	Natural or Destructive Phenomena Guidelines	39

Section 1R04: Equipment Alignment

CONDITION REPORTS

09-2645	09-5808
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DRAWINGS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
5R289F05038#1	Piping and Instrumentation Diagram Essential Cooling Water System Train 1B	8
5S142F00024#1	Piping and Instrumentation Diagram Auxiliary Feedwater	11
5Q159F00045#2 Sheet #2	Piping and Instrumentation Diagram Standby Diesel Generator Fuel Oil	8
5Q159F22540#2	Piping and Instrumentation Diagram Standby Diesel Jacket Water	21

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
5Q159F22542#2	Piping and Instrumentation Diagram Standby Diesel Lube Oil	19

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
OPOP02-AF-0001	Auxiliary Feedwater	27
OPOP02-DG-0003	Emergency Diesel Generator 13(23)	47
OPOP02-EW-0001	Essential Cooling Water Operations	49
OPSP03-EW-0016	Essential Cooling Water Valve Checklist	14

Section 1R05: Fire Protection

FIRE PREPLANS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
0DGB37-FP-0513	Fire Preplan Diesel Generator Building Diesel Air Intake/Exhaust, Train B	3
0DGB39-FP-0503	Fire Preplan Diesel Generator Building Diesel Fuel Oil Storage Tank, Train C	3
0DGB40-FP-0504	Fire Preplan Diesel Generator Building Diesel Fuel Oil Storage Tank, Train B	3
0DGB41-FP-0505	Fire Preplan Diesel Generator Building Diesel Fuel Oil Storage Tank, Train A	3

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
OPGP03-ZF-0011	STPEGS Fire Brigade	10

Section 1R12: Maintenance Effectiveness

CONDITION REPORTS

06-16805	07-2563	08-19103
06-17091	07-11567	09-14955
07-2562	07-18470	

MISCELLANEOUS

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
N/A	Performance Criteria, Goals and Monitoring List	September 23, 2009
N/A	System Health Report – Aux. Feed (AF)	Third Quarter 2007 through Second Quarter 2009
MRBD TAB 14	Maintenance Rule System Scoping Basis Report	July 27, 2005

Section 1R13: Maintenance Risk Assessment and Emergent Work Controls

CONDITION REPORTS

02-1985	04-14615	09-9060
02-16104	05-6963	09-12995

MISCELLANEOUS

<u>TITLE</u>	<u>DATE</u>
1RE15 Shutdown Risk Assessment Report	September 23, 2009

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
CAP-0001	CR Classification Guideline	3
0PEP02-CU-0001	Calorimetric Verification	12
0PGP03-ZA-0090	Work Process Program	33
0PGP03-ZO-0042	Reactivity Management Program	10
0PGP03-ZO-0049	Conduct of Tests or Evolutions Requiring Additional Controls	0
0PGP03-ZX-0002	Condition Reporting Process	37
0POP02-SB-0001	Steam Generator Blowdown System	29
0POP03-ZG-0008	Power Operations	49
RECM-0001	Reactivity Management Guidelines	3

WORK ACTIVITY NUMBERS

331536	341845	355152
341844	346167	

Section 1R15: Operability Evaluations

CONDITION REPORTS

03-5398	09-3475	09-10339
05-8880	09-8734	09-10355
07-12053	09-8736	09-10404
08-11351	09-8980	09-11301
08-13702	09-9097	09-13263
08-17146	09-10267	09-13930
09-2976	09-10326	09-14307

MISCELLANEOUS

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
AE-NOC-01000851	South Texas Project, Units 1 and 2 – Issuance of Amendments on Elimination of Response Time Testing (TAC NOS. MB1412 and MB1420)	August 21, 2001
NOC-AE-01001020	Proposed Modification to Technical Specifications Requirements Associated with Response Time Testing of Selected Pressure Sensors and Selected Protection Channels	February 28, 2001

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
4E019NQ1009	Design Criteria for Equipment Qualification Program	11
0PMP07-AM-0012	QDPS APC-A2 Removal From Service	9

WORK AUTHORIZATION NUMBERS

369917

Section 1R18: Plant Modifications

CONDITION REPORTS

06-15116	07-7404
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PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
0PGP03-ZO-0003	Temporary Modifications	24
0PSP03-SP-0001	Remote Shutdown Monitoring and Accident Monitoring Instrumentation Channel Checks	71

TEMPORARY MODIFICATIONS

T2 08-18901-1 T2-09-12727-3

WORK AUTHORIZATION NUMBERS

384208 386731

Section 1R19: Postmaintenance Testing

CONDITION REPORTS

07-14396 07-14691 09-7520
07-14659 08-13702 09-9623
07-14661

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
0PGP03-ZE-0027	ASME Section XI Repair, Replacement, and Post-Maintenance Pressure Testing	28
0PGP03-ZE-0056	Instrumentation Installation	5
0PGP03-ZM-0021	Control of Configuration Changes	17
0PGP03-ZM-0025	Post-Maintenance Testing Program	12
0PMP02-AG-0004	Bolted Joint Procedure	14
0PMP04-ZG-0071	Westinghouse Swing Check Valve Maintenance – 3 to 18 Inch	10
0PMP05-CH-0003	York Chiller Inspection & Maintenance 300 Tons	1
0PSP03-RH-0003	Residual Heat Removal Pump 1C (2C) Inservice Test	14

WORK AUTHORIZATION NUMBERS

343189	347197	380377
347044	347205	383015
347196	362142	386557

Section 1R20: Refueling and Other Outage Activities

CONDITION REPORTS

09-1429	09-14156
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PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
0PEP02-ZG-0008	Estimated Critical Condition Calculation	8
0PGP03-ZA-0101	Shutdown Risk Assessment	19
0POP03-ZG-0001	Plant Heatup	49
0POP03-ZG-0003	Secondary Plant Startup	23
0POP03-ZG-0004	Reactor Startup	32
0POP03-ZG-0005	Plant Startup to 100%	58
0POP03-ZG-0006	Plant Shutdown from 100% to Hot Standby	35
0POP03-ZG-0007	Plant Cooldown	56
0POP03-ZG-0008	Power Operations	49
0PSP10-ZG-0003	Shutdown Margin Verification – Modes 3, 4, and 5	11
0PSP10-ZG-0005	Shutdown Margin Verification – Modes 1 and 2	4

Section 1R22: Surveillance Testing

CONDITION REPORTS

09-4716	09-7940	09-11912
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DRAWINGS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
5R209F05018#1	Piping and Instrumentation Diagram: Component Cooling Water System	17
5R209F05017#2	Piping and Instrumentation Diagram: Component Cooling Water System	20

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
0PGP03-ZE-0027	ASME Section XI Repair, Replacement, and Post-Maintenance Pressure Testing	28
0PMP02-ZG-0004	Bolted Joint Procedure	14
0PMP04-ZG-0058	Mission Split Disk/Clow Dual Plate Check Valve Maintenance	10
0PSP03-CV-0001	Centrifugal Charging Pump 1A(2A) Inservice Test	28
0PSP03-RC-0006	Reactor Coolant Inventory	21
0PSP11-CC-0007	LLRT: M-33 CCW to RHR HX and Pump 1A/2A	9
0PSP11-CC-0009	LLRT: M-35 CCW to RHR HX and Pump 1B/2B	12
0PSP11-ZA-0005	Local Leakage Rate Test Calculations, Guidelines, and Program	18

WORK AUTHORIZATION NUMBERS

329898	361132	377917
329897	372544	385965

Section 40A1: Performance Indicator Verification

CONDITION REPORTS

09-15752