



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
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January 25, 2011

Mr. Barry Allen
FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station
5501 North State Route 2, Mail Stop A-DB-3080
Oak Harbor, OH 43449-9760

**SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION INTEGRATED INSPECTION
REPORT 05000346/2010005 AND REPORT 07200014/2010001**

Dear Mr. Allen:

On December 31, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed an integrated inspection at your Davis-Besse Nuclear Power Station. The enclosed report documents the results of this inspection, which were discussed on January 18, 2011, with Mr. B. Boles and other members of your staff.

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

Jamnes L. Cameron, Chief
Branch 6
Division of Reactor Projects

Docket No. 50-346 and 72-014
License No. NPF-3

Enclosure: Inspection Reports 05000346/2010005 and 07200014/2010001
w/Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-346 and 72-014
License No: NPF-3

Report Nos: 05000346/2010005 and 07200014/2010001

Licensee: FirstEnergy Nuclear Operating Company (FENOC)

Facility: Davis-Besse Nuclear Power Station

Location: Oak Harbor, OH

Dates: October 1, 2010, through December 31, 2010

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Approved by: Jamnes L. Cameron, Chief
Branch 6
Division of Reactor Projects

Enclosure

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SUMMARY OF FINDINGS

IR 05000346/2010005, 07200014/2010001; 10/1/10-12/31/10; Davis-Besse Nuclear Power Station; Routine Integrated Inspection Reports

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 findings were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

Summary of Plant Status

The unit began the inspection period operating at full power. On November 5, 2010, during a planned maintenance activity to inspect control rod drive (CRD) system fuses associated with its normal rod drive power supply, control rod 3-4 was in the process of being transferred to the CRD system's auxiliary power supply when the control rod unexpectedly ratcheted into the reactor core. The control rod went from its normal position of 100 percent withdrawn to a final position of 72 percent withdrawn. In response to the transient, plant operators rapidly ramped unit power down to approximately 50 percent in accordance with operating procedures.

Following troubleshooting, control rod 3-4 was recovered on November 7, 2010, and a slow power ascension commenced to return the unit to full power operation. Operation at full power was restored on November 11, 2010, and the unit remained operating at or near full power for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstone: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

.1 Winter Seasonal Readiness Preparations

a. Inspection Scope

The inspectors conducted a review of the licensee's preparations for winter conditions to verify that the plant's design features and implementation of procedures were sufficient to protect mitigating systems from the effects of adverse weather. Documentation for selected risk-significant systems was reviewed to ensure that these systems would remain functional when challenged by inclement weather. During the inspection, the inspectors focused on plant specific design features and the licensee's procedures used to mitigate or respond to adverse weather conditions. Additionally, the inspectors reviewed the Updated Final Safety Analysis Report (UFSAR) and performance requirements for systems selected for inspection, and verified that operator actions were appropriate as specified by plant specific procedures. Cold weather protection, such as heat tracing and area heaters, was verified to be in operation where applicable. The inspectors also reviewed corrective action program (CAP) items to verify that the licensee was identifying adverse weather issues at an appropriate threshold and entering them into their CAP in accordance with station corrective action procedures. Specific documents reviewed during this inspection are listed in the Attachment. The inspectors' reviews focused specifically on the following plant systems due to their risk significance or susceptibility to cold weather issues:

- service water system; and
- borated water storage tank and associated piping.

The inspectors' review constituted one preparation for winter weather readiness inspection sample, as defined in Inspection Procedure (IP) 71111.01-05.

b. Findings

No findings were identified.

.2 Readiness for Adverse Weather Condition – Severe Thunderstorm Warning and Tornado Watch

a. Inspection Scope

With severe thunderstorms, high winds, and tornados forecast in the vicinity of the facility, the inspectors reviewed the licensee's overall preparations and response strategy for the anticipated weather conditions. On the morning of October 26, 2010, just before the scheduled arrival of the inclement weather, the inspectors conducted several physical inspections of outdoor plant areas where wind-generated missiles and debris could affect plant equipment or pose a threat to offsite electrical power. In addition, the inspectors walked down the facility's emergency diesel generators (EDGs) and the station blackout (SBO) diesel generator to verify that these components were lined up properly if needed.

The inspectors evaluated the licensee's preparations to verify that they were adequate and in accordance with site procedures, and also reviewed the licensee's CAP to ensure that any weather-related issues were appropriately entered into the system and dispositioned at an appropriate threshold. Specific documents reviewed during this inspection are listed in the Attachment.

The inspectors' review of this adverse weather condition and the licensee's response actions constituted one inspection sample as defined in IP 71111.01-05.

b. Findings

No findings were identified.

1R04 Equipment Alignment (71111.04)

.1 Quarterly Partial System Walkdowns

a. Inspection Scope

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

- emergency diesel generator 1 during testing of EDG 2 that rendered it inoperable during the period of testing on October 10, 2010;
- auxiliary feedwater (AFW) train 2 during a maintenance outage of AFW train 1 on October 26, 2010;
- high pressure injection (HPI) train 1 during inoperability of HPI train 2 for room cooler preventive maintenance on November 9, 2010; and
- HPI train 2 during inoperability of HPI train 1 for pump, motor, and valve planned preventive maintenance on December 21, 2010.

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 impact the function of the system, and therefore, potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, UFSAR, Technical Specification (TS) requirements, outstanding work orders (WOs), condition reports (CRs), 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 (CAP) with the appropriate significance characterization. Documents reviewed are listed in the Attachment to this report.

These activities constituted four partial system walkdown samples as defined in IP 71111.04-05.

b. Findings

No findings were identified.

.2 Semi-Annual Complete System Walkdown

a. Inspection Scope

During November 2010, the inspectors performed a complete system alignment inspection of the instrument and control air system to verify the functional capability of the system. This system was selected because it was considered important to plant operation and failures in the system could lead to plant transient initiation. The inspectors walked down the system to review mechanical and electrical equipment lineups, electrical power availability, system pressure and temperature indications, 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 WOs was performed to determine whether any deficiencies significantly affected the system function. In addition, the inspectors reviewed the corrective action program (CAP) database to ensure that system problems were being identified and appropriately resolved. Documents reviewed are listed in the Attachment to this report.

These activities constituted one complete system walkdown sample as defined in IP 71111.04-05.

b. Findings

No findings were identified.

1R05 Fire Protection (71111.05)

.1 Routine Resident Inspector Tours (71111.05Q)

a. Inspection Scope

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

- No. 4 mechanical penetration room (room 314, fire area A);
- No. 1 electrical penetration room (room 402, fire area DG); and
- Station blackout diesel generator building (rooms 001 through 004; no designated fire zone).

The inspectors reviewed areas to assess if the licensee 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 good material condition, and 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 (IPEEE) with later additional insights, their potential to impact equipment which 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 CAP. Documents reviewed are listed in the Attachment to this report.

These activities constituted three quarterly fire protection inspection samples as defined in IP 71111.05-05.

b. Findings

No findings were identified.

1R11 Licensed Operator Requalification Program (71111.11)

.1 Resident Inspector Quarterly Review (71111.11Q)

a. Inspection Scope

On November 10, 2010, the inspectors observed a crew of licensed operators in the plant's simulator during licensed operator requalification examinations 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;
- ability to take timely actions in the conservative direction;
- prioritization, interpretation, and verification of annunciator alarms;
- correct use and implementation of abnormal and emergency procedures;
- control board manipulations;
- oversight and direction from supervisors; and
- ability to identify and implement appropriate TS actions and Emergency Plan actions and notifications.

The crew's performance in these areas was compared to pre-established operator action expectations and successful critical task completion requirements. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one quarterly licensed operator requalification program sample as defined in IP 71111.11.

b. Findings

No findings were identified.

.2 Facility Operating History (71111.11B)

Completion of Sections .2 through .10 below constituted one biennial licensed operator requalification inspection sample as defined in IP 71111.11B.

a. Inspection Scope

The inspectors reviewed the plant's operating history from September 2008 through October 2010, to identify operating experience that was expected to be addressed by the Licensed Operator Requalification Training (LORT) program. The inspector verified that the identified operating experience had been addressed by the facility licensee in accordance with the station's approved Systems Approach to Training (SAT) program to satisfy the requirements of 10 CFR 55.59(c). The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.3 Licensee Requalification Examinations

a. Inspection Scope

The inspectors performed an inspection of the licensee's LORT test/examination program for compliance with the station's SAT program which would satisfy the requirements of 10 CFR 55.59(c)(4). The reviewed operating examination material consisted of six operating tests, each containing two or three (as appropriate) dynamic simulator scenarios and six job performance measures (JPMs). The written examinations reviewed consisted of two written examinations which were Part B, Administrative Controls and Procedure Limits. The station does not use Part A, Static

Simulator examinations. Each written examination contained 40 questions, 35 of which were open reference, 5 closed reference, and 8 questions selected outside the 2-year sample plan. The inspectors reviewed the annual requalification operating test and biennial written examination material to evaluate general quality, construction, and difficulty level. The inspectors assessed the level of examination material duplication from week-to-week during the current year operating test. The examiners assessed the amount of written examination material duplication from week-to-week for the current written examinations administered in 2010. The inspectors reviewed the methodology for developing the examinations, including the LORT program 2-year sample plan, probabilistic risk assessment insights, previously identified operator performance deficiencies, and plant modifications. The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.4 Licensee Administration of Requalification Examinations

a. Inspection Scope

The inspectors observed the administration of a requalification operating test to assess the licensee's effectiveness in conducting the test to ensure compliance with 10 CFR 55.59(c)(4). The inspectors evaluated the performance of one shift crew (two simulator crews) in parallel with the facility evaluators during two dynamic simulator scenarios and evaluated various licensed crew members concurrently with facility evaluators during the administration of several JPMs. The inspectors assessed the facility evaluators' ability to determine adequate crew and individual performance using objective, measurable standards. The inspectors observed the training staff personnel administer the operating test, including conducting pre-examination briefings, evaluations of operator performance, and individual and crew evaluations upon completion of the operating test. The inspectors evaluated the ability of the simulator to support the examinations. A specific evaluation of simulator performance was conducted and documented in the section below titled, "Conformance with Simulator Requirements Specified in 10 CFR 55.46." The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.5 Examination Security

a. Inspection Scope

The inspectors observed and reviewed the licensee's overall licensed operator requalification examination security program related to examination physical security (e.g., access restrictions and simulator considerations) and integrity (e.g., predictability and bias) to verify compliance with 10 CFR 55.49, "Integrity of Examinations and Tests." The inspectors also reviewed the facility licensee's examination security procedure, any corrective actions related to past or present examination security problems at the facility,

and the implementation of security and integrity measures (e.g., security agreements, sampling criteria, bank use, and test item repetition) throughout the examination process. The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.6 Licensee Training Feedback System

a. Inspection Scope

The inspectors assessed the methods and effectiveness of the licensee's processes for revising and maintaining its LORT Program up to date, including the use of feedback from plant events and industry experience information. The inspectors reviewed the licensee's quality assurance oversight activities, including licensee training department self-assessment reports. The inspectors evaluated the licensee's ability to assess the effectiveness of its LORT program and their ability to implement appropriate corrective actions. This evaluation was performed to verify compliance with 10 CFR 55.59(c) and the licensee's SAT program. The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.7 Licensee Remedial Training Program

a. Inspection Scope

The inspectors assessed the adequacy and effectiveness of the remedial training conducted since the previous biennial requalification examinations and the training from the current examination cycle to ensure that they addressed weaknesses in licensed operator or crew performance identified during training and plant operations. The inspectors reviewed remedial training procedures and individual remedial training plans. This evaluation was performed in accordance with 10 CFR 55.59(c) and with respect to the licensee's SAT program. The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.8 Conformance with Operator License Conditions

a. Inspection Scope

The inspectors reviewed the facility and individual operator licensees' conformance with the requirements of 10 CFR Part 55. The inspectors reviewed the facility licensee's program for maintaining active operator licenses and to assess compliance with 10 CFR 55.53(e) and (f). The inspectors reviewed the procedural guidance and the

process for tracking on-shift hours for licensed operators and which control room positions were granted watch-standing credit for maintaining active operator licenses. The inspectors reviewed the facility licensee's LORT program to assess compliance with the requalification program requirements as described by 10 CFR 55.59(c). Additionally, medical records for six licensed operators were reviewed for compliance with 10 CFR 55.53(l). The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

.9 Conformance with Simulator Requirements Specified in 10 CFR 55.46

a. Inspection Scope

The inspectors assessed the adequacy of the licensee's simulation facility (simulator) for use in operator licensing examinations and for satisfying experience requirements as prescribed in 10 CFR 55.46, "Simulation Facilities." The inspectors also reviewed a sample of simulator performance test records (i.e., transient tests, malfunction tests, steady state tests, and core performance tests), simulator discrepancies, and the process for ensuring continued assurance of simulator fidelity in accordance with 10 CFR 55.46. The inspectors reviewed and evaluated the discrepancy process to ensure that simulator fidelity was maintained. Open simulator discrepancies were reviewed for importance relative to the impact on 10 CFR 55.45 and 55.59 operator actions as well as on nuclear and thermal hydraulic operating characteristics. The inspectors conducted interviews with members of the licensee's simulator staff about the configuration control process and completed the IP 71111.11, Appendix C, checklist to evaluate whether or not the licensee's plant-referenced simulator was operating adequately as required by 10 CFR 55.46(c) and (d). The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings of significance were identified.

.10 Annual Operating Test Results (71111.11B)

a. Inspection Scope

The inspectors reviewed the overall pass/fail results of the biennial written examination, the individual Job Performance Measure operating tests, and the simulator operating tests (required to be given per 10 CFR 55.59(a)(2)) administered by the licensee from October 11 through December 8, 2010, as part of the licensee's operator licensing requalification cycle. These results were compared to the thresholds established in Inspection Manual Chapter 0609, Appendix I, "Licensed Operator Requalification Significance Determination Process (SDP)." The evaluations were also performed to determine if the licensee effectively implemented operator requalification guidelines established in NUREG 1021, "Operator Licensing Examination Standards for Power Reactors," and Inspection Procedure 71111.11, "Licensed Operator Requalification Program." The documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings were identified.

1R12 Maintenance Effectiveness (71111.12)

.1 Routine Quarterly Evaluations (71111.12Q)

a. Inspection Scope

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

- control rod drive system; and
- reactor coolant system.

The inspectors reviewed events such as where equipment maintenance had resulted or could have resulted in valid or invalid plant or equipment transients 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) of the maintenance rule;
- characterizing system reliability issues for performance;
- charging unavailability for performance;
- trending key parameters for condition monitoring;
- ensuring 10 CFR 50.65(a)(1) or (a)(2) classification or re-classification; and
- verifying appropriate performance criteria for structures, systems, and components (SSCs)/functions classified as (a)(2), or appropriate and adequate goals and corrective actions for systems classified as (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 CAP with the appropriate significance characterization. Documents reviewed are listed in the Attachment to this report.

This inspection constituted two quarterly maintenance effectiveness samples as defined in IP 71111.12-05.

b. Findings

No findings were identified.

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

.1 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

The inspectors reviewed the licensee's evaluation and management of plant risk for the emergent work activities affecting risk-significant equipment listed below to verify that the appropriate risk assessments were performed for the changed equipment issues and its influence on scheduled activities:

- work activities during the week of October 5 and October 11, 2010, with major emphasis on diagnosing issues with abnormal indications in the control rod drive system that potentially indicated issues with silicon controlled rectifier gating; and
- work activities during the period of November 5 through November 9, 2010, to respond to the unexpected ratcheting of control rod 3-4 from 100 percent withdrawn to approximately 72 percent withdrawn.

These activities were selected based on their potential risk significance relative to the Reactor Safety Cornerstones. As applicable for each activity, the inspectors verified that risk assessments were performed as required by 10 CFR 50.65(a)(4) and were accurate and complete. When emergent work was performed, the inspectors verified that the plant risk was promptly reassessed and managed. 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 TS requirements to verify risk analysis assumptions were valid and applicable requirements were met.

These maintenance risk assessments and emergent work control activities constituted two samples as defined in IP 71111.13-05.

b. Findings

No findings were identified.

1R15 Operability Evaluations (71111.15)

.1 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the following issues:

- CR 10-73116, which documented a gas void located in decay heat removal system train 2 discharge piping inside containment;
- CR 10-78496 and CR 10-85289, which documented as-found setpoints being out of tolerance on PDS2685B, main feedwater to steam generator 2 pressure differential switch;
- CR 10-83726, which documented several operability questions relating to repairs and maintenance performed on the number 2 component cooling water heat exchanger to straighten an out-of-round deficiency;

- CR 10-84495, which documented the incorrect disc being found in auxiliary feedwater safety valve AF4979;
- CR 10-84685, which documented an issue with the qualifications for the auxiliary feedwater turbine exhaust structure;
- CR 10-85617, which documented a design basis issue with the pressurizer heater bundle closure;
- CR 10-85696, which documented a performance issue with door 509 for the control room habitability envelope; and
- CR 10-85898, which documented damage to the oil drain sleeve inside emergency diesel generator 1 overspeed trip mechanism housing.

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 TS 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 TS and the 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 reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations. Documents reviewed are listed in the Attachment to this report.

The inspectors' reviews of these operability evaluations constituted eight inspection samples as defined in IP 71111.15-05.

b. Findings

No findings were identified.

1R19 Post-Maintenance Testing (71111.19)

.1 Post-Maintenance Testing

a. Inspection Scope

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

- function test and time response test of reactor trip breaker D after replacement of original breaker with a refurbished breaker;
- function test of battery charger 2P after replacement of the unit's current transformers and "walk-in" card;
- idle start, overspeed trip test, and 184 day test of EDG 1 after four-year preventive maintenance activities which included relay replacements, overspeed trip adjustment, replacement of air start motor, fuel oil storage tank drain and

clean, jacket water heat exchanger internal inspection, and other routine inspections;

- testing of control rod 3-4 to verify phase continuity in preparation for rod recovery from a partially dropped position to the normal full-out position and the subsequent recovery of the rod and verification of its functionality;
- service water pump 3 baseline performance test following motor replacement; and
- loaded run of the SBO diesel generator at the conclusion of scheduled preventive maintenance which included the engine's 24-month required preventive maintenance activities, inspection and cleaning of the voltage regulators, replacement of a speed sensing switch, and replacement of numerous relays.

These activities were selected based upon the structure, system, or component's ability to impact 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; tests were performed as written in accordance with properly reviewed and approved procedures; equipment was returned to its operational status following testing (temporary modifications or jumpers required for test performance were properly removed after test completion); and test documentation was properly evaluated. The inspectors evaluated the activities against TS, 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 post-maintenance tests (PMTs) to determine whether the licensee was identifying problems and entering them in the CAP and that the problems were being corrected commensurate with their importance to safety. Documents reviewed are listed in the Attachment to this report.

This inspection constituted six post-maintenance testing samples as defined in IP 71111.19-05.

b. Findings

No findings were identified.

1R22 Surveillance Testing (71111.22)

.1 Surveillance Testing

a. Inspection Scope

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

- DB-SP-4159, "Auxiliary Feedwater Pump 2 Monthly Test," on October 13, 2010 (routine);
- DB-PF-3023, "Service Water Pump 2 Testing," on November 1, 2010 (IST); and
- DB-OP-1101, "Containment Entry," on October 10, 2010 (routine).

The inspectors observed in-plant activities and reviewed procedures and associated records to determine the following:

- did preconditioning occur;
- were the effects of the testing adequately addressed by control room personnel or engineers prior to the commencement of the testing;
- were acceptance criteria clearly stated, demonstrated operational readiness, and consistent with the system design basis;
- plant equipment calibration was correct, accurate, and properly documented;
- measuring and test equipment calibration was current;
- test equipment was used within the required range and accuracy; applicable prerequisites described in the test procedures were satisfied;
- test frequencies met TS requirements to demonstrate operability and reliability; tests were performed in accordance with the test procedures and other applicable procedures; jumpers and lifted leads were controlled and restored where used;
- test data and results were accurate, complete, within limits, and valid;
- test equipment was removed after testing;
- where applicable for inservice testing activities, testing was performed in accordance with the applicable version of Section XI, American Society of Mechanical Engineers code, and reference values were consistent with the system design basis;
- equipment was returned to a position or status required to support the performance of its safety functions; and
- all problems identified during the testing were appropriately documented and dispositioned in the CAP.

Documents reviewed are listed in the Attachment to this report.

This inspection constituted two routine surveillance testing samples, and one inservice testing sample as defined in IP 71111.22, Sections -02 and -05.

b. Findings

No findings 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 routine licensee emergency drill on October 14, 2010, to identify any weaknesses and deficiencies in classification, notification, and protective action recommendation development activities. The inspectors observed emergency response operations in the control room simulator, technical support center, and 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 weaknesses 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. As part of the inspection, the inspectors reviewed the drill package and other documents listed in the Attachment to this report.

This emergency preparedness drill inspection constituted one sample as defined in IP 71114.06-05.

b. Findings

No findings were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2RS1 Radiological Hazard Assessment and Exposure Controls (71124.01)

The inspection activities supplement those documented in Inspection Report 05000346/2010002, and constitute one complete sample as defined in IP 71124.01-05.

.1 Contamination and Radioactive Material Control (02.04)

a. Inspection Scope

The inspectors reviewed the licensee's procedures and records to verify that the radiation detection instrumentation was used at its typical sensitivity level based on appropriate counting parameters. The inspectors assessed whether or not the licensee has established a de facto "release limit" by altering the instrument's typical sensitivity through such methods as raising the energy discriminator level or locating the instrument in a high-radiation background area.

The inspectors selected several sealed sources from the licensee's inventory records and assessed whether the sources were accounted for and verified to be intact.

The inspectors evaluated whether any transactions, since the last inspection, involving nationally tracked sources were reported in accordance with 10 CFR 20.2207.

b. Findings

No findings were identified.

.2 Radiological Hazards Control and Work Coverage (02.05)

a. Inspection Scope

The inspectors examined the licensee's physical and programmatic controls for highly activated or contaminated materials (nonfuel) stored within spent fuel and other storage pools. The inspectors assessed whether appropriate controls (i.e., administrative and

physical controls) were in place to preclude inadvertent removal of these materials from the pool.

b. Findings

No findings were identified.

2RS2 Occupational As-Low-As-Is-Reasonably-Achievable Planning and Controls (71124.02)

The inspection activities supplement those documented in Inspection Report 05000346/2010002, and constitute one complete sample as defined in IP 71124.02-05.

.3 Radiological Work Planning (02.02)

a. Inspection Scope

The inspectors selected the following work activities of the highest exposure significance.

- Reactor Head Repair Work;
- Alloy-600 Nozzle Overlay;
- Refueling Activities;
- Once-Through Steam Generator (OTSG) Work;
- Mobilizing and De-mobilizing of Scaffolds in Containment; and
- Let-down Cooler Replacement Work.

The inspectors compared the results achieved (dose rate reductions, person-rem used) with the intended dose established in the licensee's As-Low-As-Is-Reasonably-Achievable (ALARA) planning for these work activities. The inspectors compared the person-hour estimates provided by maintenance planning and other groups to the radiation protection group with the actual work activity time requirements, and evaluated the accuracy of these time estimates. The inspectors assessed the reasons (e.g., failure to adequately plan the activity, failure to provide sufficient work controls) for any inconsistencies between intended and actual work activity doses.

The inspectors determined whether post-job reviews were conducted and if identified problems were entered into the licensee's corrective action program.

b. Findings

No findings were identified.

.4 Source Term Reduction and Control (02.04)

a. Inspection Scope

The inspectors used licensee records to determine the historical trends and current status of significant tracked plant source terms known to contribute to elevated facility aggregate exposure. The inspectors assessed whether the licensee had made allowances or developed contingency plans for expected changes in the source term as

the result of changes in plant fuel performance issues or changes in plant primary chemistry.

b. Findings

No findings were identified.

Cornerstones: Public Radiation Safety

2RS6 Radioactive Gaseous and Liquid Effluent Treatment (71124.06)

This inspection constituted one complete sample as defined in IP 71124.06-05.

.1 Inspection Planning and Program Reviews (02.01)

Event Report and Effluent Report Reviews

a. Inspection Scope

The inspectors reviewed the radiological effluent release reports issued since the last inspection to determine if the reports were submitted as required by the Offsite Dose Calculation Manual (ODCM)/TS). The inspectors reviewed anomalous results, unexpected trends, or abnormal releases identified by the licensee for further inspection to determine if they were evaluated, were entered in the corrective action program, and were adequately resolved.

The inspectors identified radioactive effluent monitor operability issues reported by the licensee as provided in effluent release reports, to review these issues during the onsite inspection, as warranted, given their relative significance and determine if the issues were entered into the corrective action program and adequately resolved.

b. Findings

No findings were identified.

Offsite Dose Calculation Manual and Final Safety Analysis Report Review

a. Inspection Scope

The inspectors reviewed Final Safety Analysis Report descriptions of the radioactive effluent monitoring systems, treatment systems, and effluent flow paths so they can be evaluated during inspection walkdowns.

The inspectors reviewed changes to the ODCM made by the licensee since the last inspection against the guidance in NUREG-1301, 1302, and 0133, and Regulatory Guides 1.109, 1.21 and 4.1. When differences were identified, the inspectors reviewed the technical basis or evaluations of the change during the onsite inspection, to determine whether they were technically justified and maintain effluent releases ALARA.

The inspectors reviewed licensee documentation to determine if the licensee has identified any non-radioactive systems that have become contaminated as disclosed either through an event report or the ODCM since the last inspection. This review

provided an intelligent sample list for the onsite inspection of any 10 CFR 50.59 evaluations and allowed a determination if any newly contaminated systems have an unmonitored effluent discharge path to the environment, whether any required ODCM revisions were made to incorporate these new pathways and whether the associated effluents were reported in accordance with Regulatory Guide 1.21.

b. Findings

No findings were identified.

Groundwater Protection Initiative Program

a. Inspection Scope

The inspectors reviewed reported groundwater monitoring results and changes to the licensee's written program for identifying and controlling contaminated spills/leaks to groundwater.

b. Findings

No findings were identified.

Procedures, Special Reports, and Other Documents

a. Inspection Scope

The inspectors reviewed Licensee Event Reports, event reports, and/or special reports related to the effluent program issued since the previous inspection to identify any additional focus areas for the inspection based on the scope/breadth of problems described in these reports.

The inspectors reviewed effluent program implementing procedures, particularly those associated with effluent sampling, effluent monitor set-point determinations, and dose calculations.

The inspectors reviewed copies of licensee and third party (independent) evaluation reports of the effluent monitoring program since the last inspection to gather insights into the licensee's program and aid in selecting areas for inspection review (smart sampling).

b. Findings

No findings were identified.

.2 Walkdowns and Observations (02.02)

a. Inspection Scope

The inspectors walked down selected components of the gaseous and liquid discharge systems to verify that equipment configuration and flow paths align with the documents reviewed in Section 02.01 above and to assess equipment material condition. Special attention was made to identify potential unmonitored release points (such as open roof vents in boiling water reactor turbine decks, temporary structures butted against turbine,

auxiliary or containment buildings), building alterations, which could impact airborne, or liquid, effluent controls, and ventilation system leakage that communicates directly with the environment.

For equipment or areas associated with the systems selected for review that were not readily accessible due to radiological conditions, the inspectors reviewed the licensee's material condition surveillance records, as applicable.

The inspectors walked down filtered ventilation systems to verify there are no conditions, such as degraded high-efficiency particulate air/charcoal banks, improper alignment, or system installation issues that would impact the performance, or the effluent monitoring capability, of the effluent system.

As available, the inspectors observed selected portions of the routine processing and discharge of radioactive gaseous effluent (including sample collection and analysis) to verify that appropriate treatment equipment was used and the processing activities align with discharge permits.

The inspectors determined if the licensee has made significant changes to their effluent release points, e.g., changes subject to a 10 CFR 50.59 review or require NRC approval of alternate discharge points.

As available, the inspectors observed selected portions of the routine processing and discharge liquid waste (including sample collection and analysis) to verify that appropriate effluent treatment equipment is being used and that radioactive liquid waste is being processed and discharged in accordance with procedure requirements and aligns with discharge permits.

b. Findings

No findings were identified.

.3 Sampling and Analyses (02.03)

a. Inspection Scope

The inspectors selected effluent sampling activities, consistent with smart sampling, and assess whether adequate controls have been implemented to ensure representative samples were obtained (e.g., provisions for sample line flushing, vessel recirculation, composite samplers, etc.).

The inspectors selected effluent discharges made with inoperable (declared out-of-service) effluent radiation monitors to verify that controls are in place to ensure compensatory sampling is performed consistent with the radiological effluent TS/ODCM and that those controls are adequate to prevent the release of unmonitored liquid and gaseous effluents.

The inspectors determined whether the facility is routinely relying on the use of compensatory sampling in lieu of adequate system maintenance, based on the frequency of compensatory sampling since the last inspection.

The inspectors reviewed the results of the inter-laboratory comparison program to verify the quality of the radioactive effluent sample analyses and assessed whether the inter-laboratory comparison program includes had-to-detect isotopes as appropriate.

b. Findings

No findings were identified.

.4 Instrumentation and Equipment (02.04)

Effluent Flow Measuring Instruments

a. Inspection Scope

The inspectors reviewed the methodology the licensee uses to determine the effluent stack and vent flow rates to verify that the flow rates are consistent with radiological effluent TS/ODCM or Final Safety Analysis Report values, and that the differences between assumed and actual stack and vent flow rates do not affect the results of the projected public doses.

b. Findings

No findings were identified.

Air Cleaning Systems

a. Inspection Scope

The inspectors assessed whether surveillance test results since the previous inspection for TS required ventilation effluent discharge systems (high-efficiency particulate air and charcoal filtration), such as the Containment/Auxiliary Building Ventilation System, meet TS acceptance criteria.

b. Findings

No findings were identified.

.5 Dose Calculations (02.05)

a. Inspection Scope

The inspectors reviewed all significant changes in reported dose values compared to the previous radiological effluent release report (e.g., a factor of 5, or increases that approach Appendix I criteria) to evaluate the factors, which may have resulted in the change.

The inspectors reviewed radioactive liquid and gaseous waste discharge permits to verify that the projected doses to members of the public were accurate and based on representative samples of the discharge path.

Inspectors evaluated the methods used to determine the isotopes that are included in the source term to ensure all applicable radionuclides are included, within detectability

standards. The review included the current 10 CFR Part 61 analyses to ensure hard-to-detect radionuclides are included in the source term.

The inspectors reviewed changes in the licensee's offsite dose calculations since the last inspection to verify the changes are consistent with the ODCM Manual and Regulatory Guide 1.109. Inspectors reviewed meteorological dispersion and deposition factors used in the ODCM and effluent dose calculations to ensure appropriate factors are being used for public dose calculations.

The inspectors reviewed the latest Land Use Census to verify that changes (e.g., significant increases or decreases to population in the plant environs, changes in critical exposure pathways, the location of nearest member of the public or critical receptor, etc.) have been factored into the dose calculations.

For the releases reviewed above, the inspectors evaluated whether the calculated doses (monthly, quarterly, and annual dose) are within the 10 CFR Part 50, Appendix I and TS dose criteria.

The inspectors reviewed, as available, records of any abnormal gaseous or liquid tank discharges (e.g., discharges resulting from misaligned valves, valve leak-by, etc.) to ensure the abnormal discharge was monitored by the discharge point effluent monitor. Discharges made with inoperable effluent radiation monitors, or unmonitored leakages were reviewed to ensure that an evaluation was made of the discharge to satisfy 10 CFR 20.1501 so as to account for the source term and projected doses to the public.

b. Findings

No findings were identified.

.6 Groundwater Protection Initiative Implementation (02.06)

a. Inspection Scope

The inspectors reviewed monitoring results of the Groundwater Protection Initiative to determine if the licensee has implemented its program as intended, and to identify any anomalous results. For anomalous results or missed samples, the inspectors assessed whether the licensee has identified and addressed deficiencies through its corrective action program.

The inspectors reviewed identified leakage or spill events and entries made into 10 CFR 50.75 (g) records. The inspectors reviewed evaluations of leaks or spills, and reviewed any remediation actions taken for effectiveness. The inspectors reviewed onsite contamination events involving contamination of ground water and assessed whether the source of the leak or spill was identified and mitigated.

For unmonitored spills, leaks, or unexpected liquid or gaseous discharges, the inspectors assessed whether an evaluation was performed to determine the type and amount of radioactive material that was discharged by:

- Assessing whether sufficient radiological surveys were performed to evaluate the extent of the contamination and the radiological source term and

assessing whether a survey/evaluation has been performed to include consideration of hard-to-detect radionuclides.

- Determining whether the licensee completed offsite notifications, as provided in its Groundwater Protection Initiative implementing procedures.

The inspectors reviewed the evaluation of discharges from onsite surface water bodies that contain or potentially contain radioactivity, and the potential for ground water leakage from these onsite surface water bodies. The inspectors assessed whether the licensee is properly accounting for discharges from these surface water bodies as part of their effluent release reports.

The inspectors assessed whether on-site ground water sample results and a description of any significant on-site leaks/spills into ground water for each calendar year are documented in the Annual Radiological Environmental Operating Report for the radiological environmental monitoring program or the Annual Radiological Effluent Release Report for the radiological effluent TS.

For significant, new effluent discharge points (such as significant or continuing leakage to ground water that continues to impact the environment if not remediated), the inspectors evaluated whether the ODCM was updated to include the new release point.

b. Findings

No findings were identified.

.7 Problem Identification and Resolution (02.07)

a. Inspection Scope

Inspectors assessed whether problems associated with the effluent monitoring and control program are being identified by the licensee at an appropriate threshold and are properly addressed for resolution in the licensee corrective action program. In addition, they evaluated the appropriateness of the corrective actions for a selected sample of problems documented by the licensee involving radiation monitoring and exposure controls.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

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

4OA1 Performance Indicator Verification (71151)

.1 Mitigating Systems Performance Index - Heat Removal System

a. Inspection Scope

The inspectors sampled licensee submittals for the Mitigating Systems Performance Index (MSPI) - Heat Removal System performance indicator for the period from the fourth quarter 2009 through the third quarter 2010. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute (NEI) Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, dated October 2009, were used. The inspectors reviewed the licensee's operator narrative logs, condition reports, event reports, MSPI derivation reports, and NRC Integrated Inspection Reports for the period of October 2009 through September 2010 to validate the accuracy of the submittals. The inspectors reviewed the MSPI component risk coefficient to determine if it had changed by more than 25 percent in value since the previous inspection, and if so, that the change was in accordance with applicable NEI guidance. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the PI data collected or transmitted for this indicator and none were identified. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one MSPI heat removal system sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.2 Mitigating Systems Performance Index - Residual Heat Removal System

a. Inspection Scope

The inspectors sampled licensee submittals for the MSPI - Residual Heat Removal System performance indicator for the period from the fourth quarter 2009 through the third quarter 2010. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, dated October 2009, were used. The inspectors reviewed the licensee's operator narrative logs, issue reports, MSPI derivation reports, event reports, and NRC Integrated Inspection Reports for the period of October 2009 through September 2010 to validate the accuracy of the submittals. The inspectors reviewed the MSPI component risk coefficient to determine if it had changed by more than 25 percent in value since the previous inspection, and if so, that the change was in accordance with applicable NEI guidance. The inspectors also reviewed the licensee's issue report database to determine if any problems had been

identified with the PI data collected or transmitted for this indicator and none were identified. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one MSPI residual heat removal system sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.3 Mitigating Systems Performance Index - Cooling Water Systems

a. Inspection Scope

The inspectors sampled licensee submittals for the MSPI - Cooling Water Systems performance indicator for the period from the fourth quarter 2009 through the third quarter 2010. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, dated October 2009, were used. The inspectors reviewed the licensee's operator narrative logs, issue reports, MSPI derivation reports, event reports, and NRC Integrated Inspection Reports for the period of October 2009 through September 2010 to validate the accuracy of the submittals. The inspectors reviewed the MSPI component risk coefficient to determine if it had changed by more than 25 percent in value since the previous inspection, and if so, that the change was in accordance with applicable NEI guidance. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the PI data collected or transmitted for this indicator and none were identified. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one MSPI cooling water system sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.4 Reactor Coolant System Specific Activity

a. Inspection Scope

The inspectors sampled licensee submittals for the reactor coolant system specific activity PI for Davis-Besse Nuclear Power Station for the period from the first quarter 2009 through the third quarter 2010. The inspectors used PI definitions and guidance contained in the Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, dated October 2009, to determine the accuracy of the PI data reported during those periods. The inspectors reviewed the licensee's reactor coolant system chemistry samples, TS requirements, issue reports, event reports, and NRC Integrated Inspection Reports for the period of the first quarter 2009 and through the third quarter of 2010 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 PI 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. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one reactor coolant system specific activity sample as defined in IP 71151-05.

b. Findings

No findings were identified

4OA2 Identification and Resolution of Problems (71152)

.1 Routine Review of Items Entered into the Corrective Action Program

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 CAP at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. Attributes reviewed included: identification of the problem was complete and accurate; timeliness was commensurate with the safety significance; evaluation and disposition of performance issues, generic implications, common causes, contributing factors, root causes, extent-of-condition reviews, and previous occurrences reviews were proper and adequate; and that the classification, prioritization, focus, and timeliness of corrective actions were commensurate with safety and sufficient to prevent recurrence of the issue. Minor issues entered into the licensee's CAP as a result of the inspectors' observations are included in the Attachment to this report.

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 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 CAP. This review was accomplished through inspection of the station's daily condition report packages.

These daily reviews were performed by procedure as part of the inspectors' daily plant status monitoring activities and, as such, did not constitute any separate inspection samples.

b. Findings

No findings were identified.

.3 Semi-Annual Trend Review

a. Inspection Scope

The inspectors performed a review of the licensee's CAP and associated documents to identify trends that could indicate the existence of a more significant safety issue. The inspectors' review was focused on repetitive equipment issues, but also considered the results of daily inspector CAP item screening discussed in Section 4OA2.2 above, licensee trending efforts, and licensee human performance results. The inspectors' review nominally considered the six month period of July 1, 2010, through December 31, 2010, although some examples expanded beyond those dates where the scope of the trend warranted.

The review also included issues documented outside the normal CAP in major equipment problem lists, repetitive and/or rework maintenance lists, departmental problem/challenges lists, system health reports, quality assurance audit/surveillance reports, self assessment reports, and Maintenance Rule assessments. The inspectors compared and contrasted their results with the results contained in the licensee's CAP trending reports. Corrective actions associated with a sample of the issues identified in the licensee's trending reports were reviewed for adequacy.

This review constituted a single semi-annual trend inspection sample as defined in IP 71152-05.

b. Observations

The inspectors identified an adverse trend related to the licensee's management of TS and Limiting Conditions for Operations (LCOs):

- On August 26, 2010, licensee personnel identified that spent fuel was being stored in the spent fuel pool in a manner contrary to the pattern requirements set forth in TS 3.7.16. An initial condition report, CR 10-81824, generated by licensee personnel classified the issue as "administrative," and failed to properly identify the TS compliance issue. On August 27, 2010, the licensee revisited the issue following discussions with the inspectors, and ultimately submitted an LER (05000346/2010-004-00) under 10 CFR 50.73(a)(2) (i)(B) for the operation of the facility in a condition prohibited by TS. The licensee had entered the TS compliance issue into the CAP as CR 10-83814.
- On November 18, 2010, while restoring from an EDG 1 work window, the licensee identified that the load sequencer for EDG 1 had been declared operable prior to the performance of required post maintenance testing for the component. The licensee documented this issue in their CAP as CR 10-86284.

- On November 22, 2010, a licensee Senior Reactor Operator (SRO) identified a degraded condition with a terminal lug connection associated with AFW Pump No. 1 during review of CR 10-86147, and the pump was declared inoperable. This was over 28 hours after the initial identification of the degraded condition by licensee craft workers on November 21, 2010, but no CR was generated until the following day. The licensee entered the TS compliance issues into their CAP as CRs 10-86191 and 10-86284.

In each of these cases, the safety significance of the errors was minimal as a matter of coincidence. However, taken collectively they represent an adverse trend that requires mitigation.

c. Findings

No findings were identified.

.4 Selected Issue Follow-Up Inspection Associated with Temporary Instruction 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems": Gas Voids Detected in High Pressure Injection Discharge Piping

a. Inspection Scope

During a review of items entered in the licensee's CAP, the inspectors recognized a corrective action item documenting voids discovered in HPI discharge piping. CR 10-82372 documents a small void (approximately 38 cubic inches) discovered immediately below HP2B, HPI train 2 discharge isolation valve. The void was detected during the performance of a monthly void monitoring PM on September 8, 2010. CR 10-81409 evaluated a similar small void in HPI train 2 discharge piping near HP66, discharge line vent valve, discovered on August 18, 2010. In addition, on October 4, 2010, a follow-up void inspection documented a void on the discharge line near vent valve HP40A (CR 10-83609). Davis-Besse engineering determined that in all cases, the void sizes remained below the critical void size and did not have the potential to create an adverse water hammer event. Follow-up void inspections determined that the void size was not increasing, therefore, gas intrusion from a gas source was not considered as a credible cause. The most likely cause of gas intrusion was determined to be from inadequate draining/refilling of the system following maintenance activities performed earlier in August 2010. Specifically, there was less than adequate procedural guidance for refilling the system. A corrective action was created to revise the HPI system operating procedure to incorporate appropriate guidance for performing venting of the HPI discharge branch beneath the discharge valves for both trains of HPI. A corrective action is also tracking completion of the HPI comprehensive and check valve forward flow test during an upcoming outage, which will ensure that the HPI piping is swept free of any residual voids.

The inspectors verified that the selected CAP entry acceptably addresses the areas of concern associated with the scope of GL 2008-01, "Managing gas accumulation in emergency core cooling, decay heat removal, and containment spray systems" (Temporary Instruction (TI) 2515/177, Section 04.01).

This review constituted one in-depth problem identification and resolution sample as defined in IP 71152-05. In addition, this inspection effort counts towards the completion of TI 2515/177 which will be closed in a later Inspection Report.

b. Findings

No findings were identified.

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

.1 Loss of the Oak Harbor Power Feeder

a. Inspection Scope

At 7:48 a.m. on October 5, 2010, the inspectors observed the licensee's response to the loss of a 480 VAC transformer supplying power to various licensee facilities outside the station's main power block. The transient, which was caused by an animal-induced short, resulted in short duration power interruptions to several Emergency Preparedness facilities and components. Power to the station's Emergency Operations Facility and Technical Support Center was restored within minutes from the backup diesel generator supporting those facilities, and power to all facilities and components was reestablished by 10:30 a.m.

The inspectors reviewed the appropriateness of the licensee's actions against the requirements of applicable procedures, and independently reviewed the event against the reporting requirements in 10 CFR 50.72 and 50.73. Documents reviewed by the inspectors as a part of this inspection are listed in the Attachment.

This event follow-up review constituted one inspection sample as defined in IP 71153-05.

b. Findings

No findings were identified.

.2 (Closed) Licensee Event Report 05000346/2010-002-01, Control Rod Drive Nozzle Primary Water Stress Corrosion Cracking and Pressure Boundary Leakage

On September 30, 2010, the licensee submitted Revision 1 of the subject LER. Previously, the inspectors had reviewed and closed Revision 0 of the LER in Inspection Report 05000346/2010008 (ADAMS Accession No. ML102930380).

The inspectors reviewed Revision 1 of the subject LER, which documented information regarding the results of the licensee's root cause analysis performed in response to the subject event. This root cause analysis was still in progress at the time Revision 0 of the LER was required to be submitted. The inspectors determined that the licensee's new information neither altered the conclusions drawn during the closure of Revision 0, nor constituted information that would lead to the identification of any new violations of NRC requirements. As a result, Revision 1 of this LER is closed. Documents reviewed by the inspectors as a part of this inspection are listed in the Attachment.

This LER review constituted one inspection sample as defined in IP 71153-05.

4OA5 Other Activities

.1 Licensee Activities and Meetings

In addition to regularly attending daily plant status meetings, the inspectors observed select portions of other licensee activities and meetings and met with licensee personnel to discuss various topics. The activities that were sampled included:

- Davis-Besse Monthly Performance Review meeting with First Energy Nuclear Operating Company (FENOC) executives on October 22, 2010;
- Fleet Oversight audit exit on October 8, 2010, of findings from a review of Chemistry Department activities at Davis-Besse and other FENOC nuclear plants;
- Plant supervisor periodic briefing on November 8, 2010; and
- Corporate Nuclear Review Board exit meeting on December 3, 2010.

.2 (Open) NRC Temporary Instruction 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems (NRC Generic Letter 2008-01)"

High Pressure Injection System Walkdown

a. Inspection Scope

On March 17 and 22, 2010, the inspectors conducted a walkdown of the HPI system inside containment in sufficient detail to reasonably assure the acceptability of the licensee's walkdowns. The licensee's documented walkdown results were not available to the inspectors at the end of that inspection interval. During this inspection interval the inspectors verified that the licensee's documented results were consistent with the isometric drawings and results from the inspectors' walkdown documented in Davis-Besse Inspection Report 05000346/2010-002 (TI 2515/177, Section 04.02.d).

Documents reviewed are listed in the Attachment to this report.

b. Findings

This inspection effort counts towards the completion of TI 2515/177 which will be closed in a later inspection report.

Review of High Pressure Injection Piping Void

As documented in Section 4OA2, the inspectors confirmed the acceptability of the described licensee's actions. This inspection effort counts towards the completion of TI 2515/177 which will be closed in a later Inspection Report.

.3 Operation of an Independent Spent Fuel Storage Installation (60855.1)

a. Inspection Scope

The inspectors conducted document reviews, held discussions with licensee staff, and performed a walkdown of the Independent Spent Fuel Storage Installation (ISFSI) to assess compliance with the applicable Certificate of Compliance, TSs, and the Site

Safety Analysis Report. During the walkdown, the condition of the Horizontal Storage Modules was evaluated and the inspectors observed the licensee perform routine surveillance activities, including inspections of the vent screens and taking thermocouple readings.

Plant procedures were reviewed to determine whether the licensee had adequate controls in place to monitor the radiation dose resulting from the operation of the ISFSI. The inspectors reviewed several routine radiation surveys performed by the licensee around the pad, and conducted independent surveys to verify dose rates. Additionally, the inspectors reviewed the licensee's procedures for control of special nuclear material, and the most recent annual inventory as it related to the ISFSI, to verify that the fuel in the Dry Storage Canisters was accounted for and controlled. The inspectors determined if the site had an unloading procedure and reviewed the control of transient combustible material procedure, emergency procedures, and the Emergency Plan for their adequacy in regard to the ISFSI.

Condition reports, and the associated follow up actions, were reviewed to assess the adequacy and timeliness of the licensee's corrective actions. A number of 10 CFR 72.48 screenings were reviewed, focusing on those associated with the temporary storage of Sea-Land containers on the ISFSI pad, for compliance with the transient combustible procedure, the 72.212 report, and the Site Safety Analysis Report.

b. Findings

No findings were identified

.4 (Closed) Violation, 05000346/2009007-01; Inappropriate Change of Fuel Transfer Tube Seal Configuration: Follow up on Traditional Enforcement Actions Including Violations (92702)

In a letter dated February 19, 2010, (ML100501213) and a final enforcement letter, dated April 30, 2010, (ML101200649), violations of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," and 10 CFR 50.71(e) were issued to the licensee for the failure to implement design control measures, which assured that the design basis, as specified in the license application, was correctly translated into specifications, drawings, procedures, and instructions and failed to correctly update the USAR to reflect the safety analyses associated with License Amendment 240. As a result of these failures, the fuel transfer tube blind flange seal configuration was contrary to the licensing basis.

During this inspection, inspectors reviewed the licensee's corrective actions as described in a letter dated March 22, 2010 (ML102520102). The inspectors verified that revisions had been made to the following procedures to address the violation:

- NOP-LP-4008, Revision 02, "Licensing Document Change Process;"
- NOP-CC-2007, Revision 02, "Part and Component Equivalent Replacement Packages;"
- NOP-CC-2004 Revision 07, "Design Interface Reviews and Evaluations;"
- NOP-CC-2003, Revision 14, "Engineering Changes;" and
- Procedure DB-MM-09186, Revision 06, "Fuel Transfer Tube Blind Flange Removal and Reinstallation."

The inspectors also verified that the licensee installed, as described in the USAR and License Amendment (LA) 240, a “double O-Ring” configuration into the fuel transfer tube blind flange assemblies. With this configuration, the licensee is crediting the “excellent testing history” as described in LA 240. The licensee plans to conduct “as-found” testing on the double O-Ring configuration during the fall 2011 mid-cycle outage to confirm similar performance as described by the “as-found” test results from 1991-1998. This action is being tracked by CR 10-85444 and WO 200428110.

No additional findings were identified. This violation is closed.

.5 (Closed) Temporary Instruction 2515/179, “Verification of Licensee Responses to NRC Requirement for Inventories of Materials Tracked in the National Source Tracking System Pursuant to Title 10, Code of Federal Regulations, Part 20.2207 (10 CFR 20.2207)”

a. Inspection Scope

The inspectors confirmed that the licensee has reported the initial inventories of sealed sources pursuant to 10 CFR 20.2207 and verified that the National Source Tracking System database correctly reflects the Category 1 and 2 sealed sources in custody of the licensee. Inspectors interviewed personnel and performed the following:

- reviewed the licensee’s source inventory;
- verified the presence of any Category 1 or 2 sources, the licensee possessed 2 Category 2 sources;
- reviewed procedures for and evaluated the effectiveness of storage and handling of sources;
- reviewed documents involving transactions of sources; and
- reviewed adequacy of licensee maintenance, posting, and labeling of nationally tracked sources.

b. Findings

No findings were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

On January 18, 2010, the inspectors presented the inspection results to Mr. B. Boles and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary. Proprietary material reviewed during the inspection was controlled in accordance with NRC policy, and annotated as proprietary in the List of Documents Reviewed.

.2 Interim Exit Meetings

Interim exit meetings were conducted for:

- the ISFSI operational inspection included an interim exit meeting on November 19, 2010. The inspectors presented the inspection results to members of the licensee management and staff. Licensee personnel acknowledged the information presented;
- the radioactive gaseous and liquid effluent treatment and a performance indicator under the public radiation safety cornerstone and under occupational radiation safety cornerstone with Mr. B. Boles, Director – Operations, on November 19, 2010;
- the closure of VIO 05000346/2009007-01 with Mr. J. Sturdavant, Senior Nuclear Specialist, Regulatory Compliance via telephone on December 10, 2010;
- the results of the licensed operator requalification training program inspection with the Site Vice President, Mr. B. Allen, on November 19, 2010;
- the licensed operator requalification training biennial written examination and annual operating test results with the Nuclear Compliance Supervisor, Mr. G. Wolfe, via telephone on December 8, 2010; and
- the radiological hazard assessment and exposure controls and occupational ALARA planning and controls under the Occupational Radiation Safety Cornerstone, and verification of licensee responses to NRC requirement for inventories of materials tracked in the National Source Tracking System with Mr. B. Allen, Site Vice President on December 17, 2010.

The inspectors confirmed that none of the potential report input discussed was considered proprietary. Proprietary material reviewed during the inspection was returned to the licensee.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

B. Allen, Site Vice President
P. Boissoneault, Chemistry Manager
B. Boles, Director, Site Operations
K. Byrd, Director, Site Performance Improvement
G. Chung, Radiation Monitor System Engineer
D. Dibert, Reactor Engineer, Plant Engineering
J. Dominy, Director, Site Maintenance
A. Garza, ALARA Specialist (Lead for Set Point Manual)
G. Hayes, Reactor Engineering Supervisor, Plant Engineering
R. Hovland, Training Manager
V. Kaminskas, Director, Site Engineering
P. McCloskey, Manager, Site Regulatory Compliance
D. Noble, Radiation Protection Manager
A. Percival, Sr. Chemistry Technologist (Liquid Radwaste and Effluent Analysis)
J. Scott, Supervisor RP
C. Steenbergen, Operations Training Superintendent
J. Sturdavant, Regulatory Compliance
S. Trickett, Superintendent Radiation Protection
J. Vetter, Emergency Response Manager
A. Wise, Technical Services Manager
G. Wolf, Supervisor, Regulatory Compliance

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened

None.

Closed

05000346/2010-002-01	LER	Control Rod Drive Nozzle Primary Water Stress Corrosion Cracking and Pressure Boundary Leakage (Section 40A3.2)
05000346/2009007-01	VIO	Inappropriate Change of Fuel Transfer Tube Seal Configuration (40A5)
TI 2515/179	TI	Verification of Licensee Responses to NRC Requirement for Inventories of Materials Tracked in the National Source Tracking System Pursuant to Title 10, Code of Federal Regulations, Part 20.2207 (40A5)

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector 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.

1R01 Adverse Weather Protection

Condition Reports:

- 09-60563; Freeze Protection Circuit 90 Not Within 10 Degrees Fahrenheit

Procedures:

- DB-OP-06913; Seasonal Plant Preparation Checklist; Revisions 20 and 21
- RA-EP-02810; Emergency Plan Off Normal Occurrence Procedure – Tornado; Revision 8

1R04 Equipment Alignment

Procedures:

- DB-OP-6011; High Pressure Injection Operating Procedure; Revision 26 and 27
- DB-OP-06233; Auxiliary Feedwater System Operating Procedure; Revision 30
- DB-OP-6251; Station and Instrument Air Operating Procedure; Revision 24
- DB-OP-6316; Diesel Generator Operating Procedure; Revision 48

Drawings:

- OS-3; High Pressure Injection; Revision 32
- OS-017A, Sheet 1; Auxiliary Feedwater System; Revision 23
- OS-017B, Sheet 1; Auxiliary Feedwater Pumps and Turbines; Revision 25
- OS-19A, Sheet 1; Instrument Air System; Revision 29
- OS-19A, Sheet 2; Instrument Air System; Revision 19
- OS-19B, Sheet 1; Station Air System; Revision 22

Other:

- ECP 07-0169-00; High Pressure Injection to Core Flood Tanks Common Fill/Pressure Indication; Revision 0
- SD-1; Station and Instrument Air System; Revision 5
- Station and Instrument Air; System Health Report; Second Quarter 2010

1R05 Fire Protection

Procedures:

- DB-MS-01637; Scaffolding Erection and Removal; Revision 12
- DB-PF-00007; Control of Transient Combustibles; Revision 8
- NG-DB-00269; Electrical Safety; Revision 10
- PFP-AB-314; Protected Area Pre-Fire Plan, No. 4 Mechanical Penetration Room, Rooms 115CC, 314 and 314CC, Fire Area A; Revision 8

Drawings:

- A-223F; Fire Protection General Floor Plan El. 585'-0"; Revision 21
- A-224F; Fire Protection General Floor Plan El. 603'-0"; Revision 23

- E-892, Sheet 21; Raceway – Fire Alarm System, SBODG Building; Revision 2
- M-2501; Station Blackout Diesel Generator Building Sprinkler System; Revision 1

Other:

- Fire Hazard Analysis Report

1R11 Licensed Operator Requalification Program

Condition Reports:

- CR-10-74069; Improvement Opportunity for “Time Imbedded” EAL Implementation

Procedures:

- DBBP-OPS-1013; Control of Time Critical Actions; Revision 1
- NOBP-TR-1112; Revision 0
- NOP-OP-1013; Control of Time Critical Operator Actions; Revision 00
- NOP-TR-1001-01; 2009 Remedial-Make-up Recommendations; Revision 1
- SN-SA-10-261; Simulator Performance Testing Snapshot Self-Assessment
- SN-SA-10-295; Licensed Operator Requalification Training Snapshot Self-Assessment
- TNS-09-00005; Proficiency Watch-standing Status; Fourth Quarter 2008
- TNS-09-00006; Proficiency Watch-standing Status; Fourth Quarter 2008, Revision 1
- TNS-09-00008; Proficiency Watch-standing Status; First Quarter 2009
- TNS-09-00027; Proficiency Watch-standing Status; Second Quarter 2009
- TNS-09-00028; Proficiency Watch-standing Status; Third Quarter 2009
- TNS-10-00001; Proficiency Watch-standing Status; Fourth Quarter 2009
- TNS-10-00009; Return to Active Status; First Quarter 2010
- TNS-10-00014; Return to Active Status; Second Quarter 2010
- TNS-10-00018; Return to Active Status; Third Quarter 2010

Other:

- 2010 Biennial RO written examinations: 40703; 40942
- 2010 Biennial SRO written examinations: 40702; 40943
- 2010-02-C; Performance Gap Analysis for CR-10-74069, Improvement Opportunity for “Time Imbedded” EAL Implementation
- Annual-Biennial Licensed Operator Requalification Examination Sample Plan
- ORQ-EPE-S102; Simulator Guide 11-11-10; Revision 12
- ORQ-EPE-S103; Loss of NNI Y-AC, CCW Pump Trip, SG Tube Leak, SG Tube Rupture and No HPI; November 8, 2010
- ORQ-EPE-S103; Simulator Guide 11-08-10; Revision 9
- ORQ-EPE-S106; Simulator Guide 10-12-10; Revision 12
- ORQ-EPE-S114; Simulator Guide 11-11-10; Revision 10
- ORQ-EPE-S115; Simulator Guide 11-01-10; Revision 11
- ORQ-EPE-S122; Simulator Guide 10-12-10; Revision 10
- ORQ-EPE-S123; Simulator Guide 11-01-10; Revision 11
- ORQ-EPE-S127; Simulator Guide 11-01-10; Revision 8
- ORQ-EPE-S129; Simulator Guide 11-08-10; Revision 10
- ORQ-EPE-S139; Simulator Guide 11-08-10; Revision 4
- TEEW 2010-02-C; Training Effectiveness Evaluation Worksheet for CR-10-74069, Improvement Opportunity for “Time Imbedded” EAL Implementation Cycle 10-02 E-Plan Lessons Learned; 03-28-10

- Week 1 JPMs; 10-15-10
- Week 2 JPMs; 10-20-10
- Week 2 JPMs; 10-22-10
- Week 3 JPMs; 10-27-10
- Week 4 JPMs; 11-04-10
- Week 5 JPMs; 11-11-10
- Week 6 JPMs; 11-18-10

1R12 Maintenance Effectiveness

Condition Reports:

- 10-78802; RCP 1-2 AC Oil Lift Pump Would Not Stop From Control Switch
- 10-78926; BACC: Discovered A Small Leak Downstream Of The RC4610B High Point Vents
- 10-79068; RCPM 1-1 Lwr Brg Oil Lvl High Alarm
- 10-79087; Increased Frequency Of CTMT Normal Sump Pump Downs
- 10-80584; RCP 1-2 3rd Stage Seal Degradation
- 10-81269; RCP 1-2 2nd Seal Cavity Pressure Jumped Up To 3005 PSIG

Procedures:

- DB-PF-00003; Maintenance Rule; Revision 28
- NG-EN-00327; Reactor Coolant System Integrated Leakage Program; Revision 1
- NOP-ER-3004; FENOC Maintenance Rule Program; Revision

Work Orders:

- 200421066; Leaks at Code Safety Drain Line Connection
- 200422410; SV4610A/B – Replace Valve
- 200426855; Rebuild Spare RCP N9000 Seal
- 200428561; RCPM 1-1 LWR BRG Oil LVL HI Alarm – L787
- 2006DB291; Install New Style Pilot Operated Relief Valve
- 2008DB386; Pressurizer Code Safety Valve Modification
- 2009DB400; Mitigate Alloy 600 in the Reactor Coolant System

Other:

- CRD System Failure Summary Report for Period of 2005 to 2010; October 18, 2010
- SD-39A; System Description for Reactor Coolant System; Revision 5
- SD-49; System Description for Control Rod Drive System; Revision 5
- System Health Report 2010-2 for System 55-01-CRD; September 14, 2010
- System Health Report 2010-2 for System 62-01-Reactor Coolant System; September 14, 2010

1R13 Maintenance Risk Assessments and Emergent Work Control

Condition Reports:

- 10-83945; ODMI-Plant Operations with Degraded Power Supply in the CRD System
- 10-83968; Reactivity Management Impact of CRD System 3rd Phase Light Issue
- 10-84299; ODMI: (Rev 1) Plant Operations with Degraded Power Supply in the CRD System
- 10-85453; Safety Control Rod 3-4 Ratcheted in From 100% to 72% Withdrawn

Procedures:

- DB-OP-2504; Rapid Shutdown; Revision 15
- DB-OP-2516; CRD Malfunctions; Revision 10
- NG-DB-00001; On-Line Risk Management; Revision 12

- NOP-OP-1007; Risk Management; Revision 08
- NOP-OP-1010; Operational Decision-Making; Revision 02

Other:

- LER 90-016; Reactor Trip Due to Group Rod Drop; Revision 1
- Problem Solving Plan for CR 10-83516; Third Phase Light in CRD System; October 6, 2010

1R15 Operability Evaluations

Condition Reports:

- 09-67192; During Performance of DB-MI-3204 PDS2685B Found Out of Tolerance
- 10-73116; UT Verification Near DH7A DH Train 2 Discharge Piping Detected Potential Void
- 10-78496; PDS-2685B Found Outside Allowable Range
- 10-81193; Hinge Pin Bent on CCW Heat Exchanger #2 South Door
- 10-81268; #2 CCW Heat Exchanger Door & Flange on South End Bolt Holes Not Matching Up
- 10-81617; QC ID: CCW #2 Heat Exchanger PT Exam Failure
- 10-83726; Control of Process Used for Straightening CCW HX
- 10-84495; Incorrect Disc Found in Safety Valve
- 10-84685; Personnel Shop Facility – Evaluation of Effect on Plant Equipment
- 10-85289; PDS2685B Found Out of Tolerance
- 10-85617; Potential Lack of Design Basis for 177FA (B&W) Pressurizer Heater Bundle Closure
- 10-85696; Door 509 Will Not Latch
- 10-85898; EDG K5-1 Overspeed Trip Housing Drain Sleeve Degradation

Procedures:

- NG-EN-316; Control of Special Processes; Revision 06
- NOP-CC-5002; Control of Special Processes; Revision 02
- NOP-CC-5703; ASME Section XI Repair/Replacement (R/R) Program; Revision 00
- NOP-SS-3001; Procedure Review and Approval; Revision 15
- NOP-WM-4006; Conduct of Maintenance; Revision 04

Drawings:

- ISIM2-0234A; L.P. Injection-Core Flooding System; Revision 3

Other:

- AREVA-10-03006; AREVA NP, Inc., Pressurizer Heater Bundle Closure – Pressure Retaining Analysis – AREVA Condition Report Summaries, CR-2010-6753, CR-2040-7110; 10/15/2020 [PROPRIETARY]
- FENOC Quality Assurance Program Manual; Revision 13
- MPR Associates Report, MPR-3234; HPI, DH Water Hammer Evaluation; dated September 24, 2008

1R19 Post Maintenance Testing

Condition Reports:

- 10-85347; Service Water Pump 3 Has No Packing Leakoff, Causing It Heat Up the Packing
- 10-85498; Rod 3-4 Transfer Switch Failed to Transfer From the Control Room
- 10-85761; Service Water Pump 3 Insufficient Packing Leakoff
- 10-85995; Heat Shield On EDG #1 Exhaust – Four Cracked Welds That Attach It To The Manifold

- 10-86004; EDG #1 Week Tank Level Indication Unreliable
- 10-86005; High Post Maintenance Vibrations On C25-1&2
- 10-86059; PMT For EDG#1 Sequencer Marked As N/A
- 10-86179; Service Water Pump 3 Stuffing Box Found 180 Degrees Out of Alignment
- 10-86556; Pre-Job Brief for SC-4271, SBODG Monthly, Delayed
- 10-86932; EDG1 Fuel Injector Timing
- 10-86944; Service Water 3 Baseline Evaluate Data

Procedures:

- DB-ME-3003; Station Battery Charger Test; Revision 10
- DB-ME-9201 Cyberex Battery Charger Maintenance; Revision 5
- DB-MI-3013; Channel Functional Test of Reactor Trip Breaker D; Revision 24
- DB-OP-6316; Diesel Generator Operating Procedure; Revision 48
- DB-OP-6402; CRD Operating Procedure; Revision 18
- DB-PF-3216; Baseline Testing of Service Water Pump 3 in Modes 1-4; Revision 5
- DB-SC-3076; Emergency Diesel Generator 1 184 Day Test; Revision 25
- DB-SC-3080; Emergency Diesel Generator 1 Overspeed Trip Test; Revision 9
- DB-SC-4271; SBODG Monthly Test; Revision 19

Work Orders:

- 200288600; PM371 c4806 Swap Breaker
- 200313658; PM696 – DBC2P “ME9201” Battery Charger
- 200340755; PM 4768 – 24 Month PM SBODG
- 200340756; PM 4809 – Clean and Inspect SBODG
- 200340757; Clean and Inspect SBOD Generator
- 200340919; MI3013-001 08.000 CH3 RTB
- 200346892; K5-1 Adjust Overspeed Trip
- 200347635; PM 0721 K5-1 Cln & Ck EDG #1
- 200351193; PM 0714 K5-1 Replace Relay EDG 1
- 200351205; PM 2686 Drain, Clean FOST #1
- 200351624; Replace Speed Switch Assembly
- 200351625; Replace Struthers Dunn Relay
- 200355589; PM 1222 Insp/Lube EDG 1 H/V
- 200370050; Repair Air Intake Box Leak
- 200370433; PM 9240 Internal Inspection Leak Test Jacket Water HX
- 200395385; PM 1867 Replace Air Start Motor
- 200427649; Battery Charger 2P “A” Phase CT Shorted
- 200428539; Contingent: DBC2P – Remove Walk-In Board and Place in DBC1N
- 200435938; Rod 3-4 Phase Verification for Recovery

Drawings:

- OS-20, Sheet 1; Service Water System; Revision 82

Other:

- Evolution Specific Reactivity Plan; Misaligned Rod 304 Recovery from ~72% Withdrawn; November 7, 2010

1R22 Surveillance Testing

Condition Reports:

- 02-81; Re-Evaluate AFW Availability During Monthly Jog

- 10-85347; Service Water Pump 3 Has No Packing Leakoff, Causing It Heat Up the Packing
- 10-85642; BACC: Boron on Pipe Cap Below CF60
- 10-85643; BACC: Leak on Pipe Cap Below RC14K
- 10-85644; BACC: Packing Leak on DH76
- 10-85652; Containment Green Dust Update
- 10-85761; Service Water Pump 3 Insufficient Packing Leakoff
- 10-86179; Service Water Pump 3 Stuffing Box Found 180 Degrees Out of Alignment
- 10-86944; Service Water 3 Baseline Evaluate Data

Procedures:

- DB-OP-1101; Containment Entry; Revision 9
- DB-PF-03023; Service Water Pump 2 Testing; Revision 21
- DB-PF-03216; Baseline Testing of Service Water Pump 3 in Modes 1-4; Revision 5
- DB-PF-06074; Pump Performance Curves; Revision 26
- DB-SP-3160; AFP2 Quarterly Test; Revision 23
- DB-SP-4159; AFP2 Monthly Test; Revision 4

Drawings:

- OS-17B, Sheet 1; Auxiliary Feedwater Pumps and Turbines; Revision 25
- OS-20, Sheet 1; Service Water System; Revision 82

Other:

- ISTB2; Pump and Valve Basis Document, Volume II – Pump Basis; Revision 11
- ISTEP3; Third Ten Year Inservice Testing Program

1EP6 Drill Evaluation

Condition Reports:

- 10-84482; EP Drill – October 14, 2010 – EOF Communications Challenges
- 10-84483; EP Drill – October 14, 2010 – Emergency Director Turnover Not Timely
- 10-84486; EP Drill – October 14, 2010 – Procedural Requirements Not Met
- 10-84489; EP Drill – Non-Routine Release Not Recognized By EOF Staff
- 10-84546; ERO Drill 10/14/10: Missed Emergency Action Level Classification
- 10-84550; ERO Drill 10/14/10: Simulator Fidelity and Equipment Issues
- 10-84594; EP Drill – Success Determination of DEP Opportunities During October 14th Drill

Other:

- Initial Notification Forms for October 14, 2010 EP Drill
- October 14, 2010 Integrated Drill Package

2RS1 Radiological Hazard Assessment and Exposure Controls (71124.01) and Temporary Instruction 2515/179

Procedures:

- NOBP-NF-3102; Control of Non-Special Nuclear Material in Fuel Pools; Revision 0
- NOP-OP-4107; Radiation Work Permit; Revision 5
- NOP-OP-4601; Contamination Control Program; Revision 2

Other:

- DB-0204-0; Source Leak Test Records
- Davis Besse Fuel Pool Material Log

- Davis Besse Methods for Measuring Effective Dose Equivalent from External Exposure for OTSG Work and Reactor Head Repair Activities
- Licensed Sources Accountability Records 2010
- National Source Tracking Transaction Report, NRC Form 748
- National Source Tracking System Licensee Inventory for NPF-3; Docket No. 5000346; 12/21/2010

2RS2 Occupational As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls (71124.02)

Condition Reports:

- 10-72787; Dose Alarm Received by PCI Technician while Walking Down the Letdown Cooler
- 10-73313; No Shielding for Lower West Steam Generator for Areva Workers – No Low Dose Waiting Area
- 10-74006; OTSG RWP Dose Estimate Will Exceed the Original Dose Estimate
- 10-74127; High Radiation Area Boundary was Moved
- 10-74240; DB-PA-10-01 Alloy 600 Dose Reduction Measures Not Effectively Implemented
- 10-74527; DZNPS Dose Alarm Alloy 600 Core Work
- 10-74382; Airborne Conditions while Performing CO2 Cleaning of Nozzles Under Reactor Head
- 10-74824; Alloy 600 Welder Signed on the Wrong RWP Resulted in an Accumulated Dose Alarm
- 10-81848; A Concern Regarding ALARA Program Deficiencies
- 10-87418; ALARA Program - Organization of ALARA Files
- 10-87419; ALARA Program - Threshold for Work in Progress Reviews
- 10-87424; ALARA Program - RWP/Task Dose Management

Procedures:

- DB-HP-1115; Radiation Protection Procedure for OTSG Entries; Revision 13
- NOBP-OP-4109; ALARA Post Outage Report; Revision 0
- NOP-OP-4005; ALARA Program; Revision 1
- NOP-OP-4204; Special External Exposure Monitoring; Revision 3

Other:

- Radiation Work Permit and Associated ALARA Files; RWP 2010-5101; ISI on CRD Hangers, Reactor Head, CDR Head Screws
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5115; Decontamination of Reactor Head
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5117; Reactor Head and Under Head Pressure Washing Decontamination
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5118; AREVA Pre-Outage Work Activities
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5119; Removal and Replacement of Control Rod Drive in Support of Reactor Head Repair Including Mobilization Set-up, Testing and Demobilization of Equipment Material
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5124; Reactor Head Repairs – Water Jet Activities
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5130; Reactor Head NDE/QC/UT Inspection Activities

- Radiation Work Permit and Associated ALARA Files; RWP 2010-5132; Head Repairs Added Scope Weld Repair Activities
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5302; OTSG Platform Work
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5601; Alloy 600 – Cutting Concrete to Access North and South Core Flood Nozzles, Install/Remove Shielded Work Platforms, Restore Access Openings and All Support Work
- Radiation Work Permit and Associated ALARA Files; RWP 2010-5602; Alloy 600 Weld Overlay North/South Core Flood Nozzles
- Post Outage Assessment Report; 16th Refueling Outage; August 2010
- Shielding Request 2010-013; Shadow Shield for Worker on the Lower West Steam Generator; 3/28/2010
- Shielding Request 2010-014; Shadow Shield for Worker on the Lower East Steam Generator; 3/28/2010
- Davis Besse Nuclear Power Station Fleet Oversight; Quarterly Report – January 1 through April 30, 2010; 5/12/2010
- Davis Besse Manager ALARA Committee Meeting Minutes from March 8 to May 4, 2010
- Davis Besse 16 RFO Daily Exposure Summary; 12/14/2010

2RS6 Radioactive Gaseous and Liquid Effluent Treatment (71124.06)

Condition Reports:

- 08-48157; Potential Groundwater Monitoring Program Enhancements
- 09-65149; RE-4598AA Station Vent Normal Range Radiation Monitor Sample Flow
- 09-69415; Groundwater Monitoring Sample Shows Tritium Concentration above 2000 pCi/ L of Tritium
- 10-76498; Increasing Tritium Trend in Groundwater Well MW-105A
- 10-77078; Spring Groundwater Monitoring Well MW-105A Exceeds 2000 pCi/L of Tritium
- 10-79526; Frequent Filter Changes on Containment Radiation Normal Range Radiation Monitor
- 10-79761; Parameters Defaulted on the Station Accident Range Radiation Monitor
- 10-80339; Four Groundwater Wells Sampled in July Above 2000 pCi/L of Tritium
- 10-81010; Flowrate Indication on Station Vent Normal Range Radiation Monitor

Procedures:

- DB-CN-3001; Liquid and Gaseous Radioactive Dose Commitment; Revision 2
- DB-CH-4041; Retscode Gas/ODCM Validation; Revision 3
- DB-HP-4060; Effluent MDAS; Revision 0
- DB-HP-4026; Setpoint Evaluation for Steam Jet Ejector Radiation Monitors (RE1003A/B); Revision 1
- DB-OP-3011; Radioactive Liquid Batch Release; Revision 18
- DB-OP-312; Radioactive Gaseous Batch Release; Revision 18
- NOP-OP-2012; Groundwater Monitoring; dated March 06, 2009

Other:

- 2009 Davis Besse Annual Radiological Environmental Operating Report; Including Radiological Effluent Release Report
- Davis Besse Nuclear Power Station; Process Control Program; Revision 9
- DB-CN-3001-001; Liquid and Gaseous Radioactive Dose Commitment; dated March 2010, June 2010 and November 2010

- DB-CN-3008-001; Station Vent Releases, Weekly Radiological Monitoring Sampling and Analysis; RE4598AA/BA and RE4598BA/BB are Inoperable; dated November 16, 2010
- DB-HP-10000; Radiation Monitor Setpoint Change Request; Data Set since 2001
- DB-HP-10000; Radiation Monitor Setpoint Control; Revision 7
- HPGE Detector Quality Control Charts; dated May 07, 2009 through November 17, 2010
- MS-C-10-08-02; Fleet Oversight Audit Report; Chemistry and Environmental; dated October 08, 2010
- NOP-ER-3001; Problem Solving Plan; CR-10-76498; Increasing Tritium Trend in Groundwater Well MW-105A; dated June 4; 2010
- Offsite Dose Calculation Manual; Revision 24
- SA-DB-10-006; Radioactive Effluents Implementation; dated February 11, 2010
- SA-DB-10-006; Radioactive Effluents Implementation; Snapshot Self assessment Plan: dated February 11, 2010

40A1 Performance Indicator Verification

Forms:

- NOBP-LP-4012-48; MSPI Heat Removal System (AFW); Completed Forms for October 2009 through September 2010
- NOBP-LP-4012-49; MSPI Residual Heat Removal System (LPI); Completed Forms for October 2009 through September 2010
- NOBP-LP-4012-50; MSPI Support Cooling System – Component Cooling Water; Completed Forms for October 2009 through September 2010
- NOBP-LP-4012-51; MSPI Support Cooling System – Service Water; Completed Forms for October 2009 through September 2010

Procedures:

- NOBP-LP-4012; NRC Performance Indicators; Revision 3

Other:

- NEI 99-02; Regulatory Assessment Performance Indicator Guideline; Revision 6
- NOBP-LP-4012-52; Rev. No. 00; Reactor Coolant System Specific Activity; from January 2009 through September 2010
- Select Operator Logs covering the period of October 2009 through September 2010

40A2 Problem Identification and Resolution

Condition Reports:

- 07-18074; HPI Train 1 Potential Gas Intrusion
- 08-46573; Air Void Found In High Pressure Injection (HPI) Piping
- 10-78703; Gas Void Detected In Horizontal Piping By HP77A
- 10-78952; Documentation Of Leakage HPI Check Valve Testing (DB-PF-03969)
- 10-81409; Voided Piping D/S HP66 During DB-SP-03212
- 10-81824; Inconsistency Within Technical Specification Bases 3.7.16
- 10-82372; UT Verification Detected Small Void In HPI Train 2 Disch Piping Below HP2B
- 10-83608; Gas Void Found At HP61
- 10-83609; Less Than Water Solid Conditions In HPI Train 2-1 Discharge Piping Near HP40A
- 10-83814; Past Compliance with TS 3.7.16 – SFP Patterns
- 10-83875; CR Categorization Issue for the 1st Half 2010 IPAT Roll-Up
- 10-86059; WW147 Work Delay: PMT for EDG # 1 Sequencer Marked as N/A
- 10-86147; Wire Lugs Needs Replacing in C3645

- 10-86191; Delay in Documentation of a Degraded Condition in the AFW System
- 10-86284; Operations Missed Opportunities on Issues that Affect Safety System Operability

Procedures:

- DB-OP-6011; High Pressure Injection System; Revision 25
- DB-SP-3212; Venting Of ECCS Piping; Revision 17

Drawings:

- ISIM2-233D, Sheet 1; H.P. Injection System; Revision 6
- ISIM2-233D, Sheet 2; H.P. Injection System; Revision 2
- ISIM2-233D, Sheet 3; H.P. Injection System; Revision 7
- OS-03; High Pressure Injection System; Revision 32

Other:

- Davis-Besse Plant Health Report; 2nd Quarter 2010

40A3 Followup of Events and Notices of Enforcement Discretion

Condition Reports:

- 10-83677; Loss of Group 38 Due to TSC UPS Battery Failure
- 10-83685; Oak Harbor Feeder Power Outage Impact to Security
- 10-83688; Loss of Oak Harbor Power Feeder
- 10-83692; Oak Harbor Feeder Power Outage Impact to ANS Sirens
- 10-83705; Failure of SPDS From the Loss of the Oak Harbor Feeder

Procedures:

- DB-OP-6317; 480V System Switching Procedure; Revision 17
- DBRM-RC-01; Regulatory Reporting Requirements; Revision 3

40A5 Other Activities

Condition Reports:

- 07-19743; Dry Fuel Storage Facility Canister Drop Issue-Guidesleeve Weld Size
- 07-19750; Dry Fuel Storage Facility Canister Drip Issue-Guidesleeve-to-Spacer Disc Clips
- 08-34027; Transfer Tube Flanges Installed with O-Rings; 01/20/08
- 08-46188; Violation of DB-FP-00007, Control of Transient Combustibles
- 08-46365; Repeat of Transient Combustible Material Located Near Horizontal Storage Modules
- 09-61519; MS-C-09-07-01, Incorrect M&TE Accuracy Utilized For ISFSI PM
- 09-63254; Finding MS-C-09-08-22; Ineffective Corrective Action Implementation for HSM
- 09-66739; NRC ISSUE 09-CDBI-0119: Guidance for Installing Fuel Transfer Tube Blind Flanges
- 09-67480; 2009 CDBI: Inadequate Equivalency Justification Provided in ERR 60-0003-070
- 09-68029; Violation 10 CFR 50.71(e) - Fuel Transfer Tube Flanges
- 09-68031; CDBI Question Number 09-CDBI-0290
- 09-68742; Fuel Transfer Tube Flange O-Ring Bonding Material
- 10-73290; Unattended Vehicle in the 75 foot Exclusion Zone Near the Dry Fuel Storage Pad
- 10-75123; DIRC Checklist Needs Improvement
- 10-86018; Neutron Correction Factor Applied to Horizontal Storage Module Surveys in Error
- 10-86104; 72.48 Eval. Expired for use of Dry Cask Storage Pad

Procedures:

- DB-FP-07; Control of Transient Combustibles, Revision 9
- DB-HP-1702; Transfer, Handling, and Storage of Radioactive Material, Revision 17
- DB-MM-9186; Fuel Transfer Tubes Blind Flanges Removal and Reinstallation; Revision 5
- DB-MM-9186; Fuel Transfer Tubes Blind Flanges Removal and Reinstallation; Revision 6
- DB-NE-3400; Horizontal Storage Module (HSM) Monitoring, Revision 3
- DB-NE-4103; Physical Inventory of Special Nuclear Material, Revision 8
- DB-NE-6471; Dry Fuel Storage Unloading, Revision 1
- DBBP-RP-1010; Routine Radiological Surveys, Revision 20
- NOBP-CC-2003; Engineering Changes; Revision 14
- NOBP-CC-2007; Part/Component Equivalent Replacement Packages; Revision 2
- NOP-CC-2004; Design Interface Reviews and Evaluations; Revision 7
- NOP-LP-4003; Evaluation of Changes, Tests, and Experiments; Revision 6
- NOP-LP-4008; Licensing Document Change Process; Revision 2

Operability Evaluations:

- 2009-02; Qualification of Fuel Transfer Tube Blind Flange O-Ring Bonding material; 12/11/09

Surveillance Work Orders (Completed):

- 200139039; Fuel Transfer Tube Mech Pent; 04/16/06
- 20029890; Fuel Transfer Tube Mech Pent; 01/23/08
- 200398520; 16RFO As-Found LLRT P23 Flange
- 200398521; 16RFO As-Found LLRT P23 Flange

Work Orders:

- 200312850; Remove and Reinstall Flanges 16RFO
- 200339951; DH, LPI, BWST, and CTMT Sump Systems

Drawings:

- ISIM2-233E, Sheet 1; H.P. Injection System, Ctmt. Bldg.; Revision 1
- ISIM2-233E, Sheet 2; H.P. Injection System, Ctmt. Bldg.; Revision 2

Other:

- 10CFR72.48 Screen 600304686; Extension of Temporary Sealand Storage on Dry Fuel Storage Facility Pad
- 10CFR72.48 Screen 600366052; Extension of Temporary Sealand Storage on Dry Fuel Storage Facility Pad
- 10CFR72.48 Screen ECP 09-0041-00; USE-AS-IS Disposition for Dry Shielded Canister Guidesleeve Stitch Welds
- 100059055; O-Ring Commercial Dedication Package; 04/22/10
- 100059056; O-Ring Commercial Dedication Package; 04/22/10
- 600600167; Notification (Internal OE Sharing); 02/25/10
- Certificate of Compliance, Certificate Number 1004, Revision 0
- L-10-122; DBNPS Letter; 06/29/10
- PM 6519; Revision Eliminating Use of Flat Gaskets; 02/11/10

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access Management System
AFW	Auxiliary Feedwater
ALARA	As-Low-As-Is-Reasonably-Achievable
CAP	Corrective Action Program
CFR	Code of Federal Regulations
CR	Condition Report
CRD	Control Rod Drive
DRP	Division of Reactor Projects
EDG	Emergency Diesel Generator
HPI	High Pressure Injection
ISFSI	Independent Spent Fuel Storage Installation
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IPEEE	Individual Plant Examination of External Events
IR	Inspection Report
JPM	Job Performance Measures
LA	License Amendment
LCO	Limiting Conditions for Operations
LER	Licensee Event Report
LORT	Licensed Operator Requalification Training
MSPI	Mitigating Systems Performance Index
NEI	Nuclear Energy Institute
NRC	U.S. Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
OTSG	Once-Through Steam Generator
PARS	Publicly Available Records
PI	Performance Indicator
PI&R	Problem Identification and Resolution
PM	Planned or Preventive Maintenance
PMT	Post-Maintenance Testing
SAT	Systems Approach to Training
SBO	Station Blackout
SDP	Significance Determination Process
SRO	Senior Reactor Operator
SSC	Structures, Systems, and Components
TS	Technical Specification
UFSAR	Updated Final Safety Analysis Report
USAR	Updated Safety Analysis Report
WO	Work Order



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
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Mr. Barry Allen
FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station
5501 North State Route 2, Mail Stop A-DB-3080
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION INTEGRATED INSPECTION
REPORT 05000346/2010005 AND REPORT 07200014/2010001

Dear Mr. Allen:

On December 31, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed an integrated inspection at your Davis-Besse Nuclear Power Station. The enclosed report documents the results of this inspection, which were discussed on January 18, 2011, with Mr. B. Boles and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Based on the results of this inspection, 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 System (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/
Jamnes L. Cameron, Chief
Branch 6
Division of Reactor Projects

Docket No. 50-346 and 72-014
License No. NPF-3

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Letter to B. Allen from J. Cameron dated January 25, 2011.

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION INTEGRATED INSPECTION
REPORT 05000346/2010005 AND REPORT 07200014/2010001

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