



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

October 31, 2011

Mr. Dennis R. Madison
Vice President
Southern Nuclear Operating Company, Inc.
Edwin I. Hatch Nuclear Plant
11028 Hatch Parkway North
Baxley, GA 31513

**SUBJECT: EDWIN I. HATCH NUCLEAR PLANT – NRC PROBLEM IDENTIFICATION AND
RESOLUTION INSPECTION REPORT 05000321/2011008 AND
05000366/2011008**

Dear Mr. Madison:

On September 29, 2011, the U. S. Nuclear Regulatory Commission (NRC) completed an inspection at your Edwin I. Hatch Nuclear Plant, Units 1 and 2. The enclosed report documents the inspection findings, which were discussed with you and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and with the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of plant equipment and activities, and interviews with personnel.

On the basis of the samples selected for review, there were no findings identified during this inspection. The inspectors concluded that problems were properly identified, evaluated, and resolved within the corrective action program. However, during the inspection, some minor performance deficiencies were identified related to your adherence to corrective action program procedures with respect to prioritization and evaluation of identified problems, the effectiveness of corrective actions, and operating experience.

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

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system (ADAMS). Adams is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

George T. Hopper, Chief
Reactor Projects Branch 7
Division of Reactor Projects

Docket Nos.: 50-321, 50-366
License Nos.: DPR-57 and NPF-5

Enclosure: Inspection Report 05000321/2011008 and 05000366/2011008
w/Attachment: Supplemental Information

cc w/encl. (see page 3)

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X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE
ADAMS: X Yes ACCESSION NUMBER: ML113040311 X SUNSI REVIEW COMPLETE

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cc w/encl.

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cc w/encl. (continued next page)

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Letter to Dennis R. Madison from George T. Hopper dated October 31, 2011

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT – NRC PROBLEM IDENTIFICATION
AND RESOLUTION INSPECTION REPORT 05000321/2011008 AND
05000366/2011008

Distribution w/encl:

C. Evans, RII EICS

L. Douglas, RII EICS

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.: 50-321 and 50-366

License Nos.: DPR-57 and NPF-5

Report Nos.: 05000321/2011008 and 05000366/2011008

Licensee: Southern Nuclear Operating Company, Inc.

Facility: Edwin I. Hatch Nuclear Plant, Units 1 and 2

Location: Baxley, GA

Dates: September 12 - 16, 2011
September 26 - 29, 2011

Inspectors: B. Collins, Reactor Inspector
J. Pelchat, Senior Fuel Facilities Inspector
E. Stamm, Project Engineer (Team Leader)
N. Staples, Senior Project Engineer
R. Taylor, Senior Project Engineer

Approved by: G. Hopper, Chief
Reactor Projects Branch 7
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000321/2011008, 05000366/2011008; September 12 - 29, 2011; Edwin I. Hatch Nuclear Plant, Units 1 and 2; Biennial Inspection of the Problem Identification and Resolution Program.

The inspection was conducted by two senior project engineers, one senior fuel facility inspector, one project engineer, and a reactor engineer. No findings were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

Problem Identification and Resolution

The inspectors concluded that, in general, problems were properly identified, evaluated, prioritized, and corrected. The licensee was effective at identifying problems and entering them into the corrective action program (CAP) for resolution, as evidenced by the relatively few number of deficiencies identified by external organizations (including the NRC) that had not been previously identified by the licensee, during the review period. Generally, prioritization and evaluation of issues were adequate, formal root cause evaluations for significant problems were adequate, and corrective actions specified for problems were acceptable. Overall, corrective actions developed and implemented for issues were generally effective and implemented in a timely manner. However, the inspectors did identify some minor performance deficiencies related to your adherence to corrective action program procedures with respect to prioritization and evaluation of identified problems, the effectiveness of corrective actions, and operating experience.

The inspectors determined that, overall, audits and self-assessments were adequate in identifying deficiencies and areas for improvement in the CAP, and appropriate corrective actions were developed to address the issues identified. Operating experience usage was found to be generally acceptable and integrated into the licensee's processes for performing and managing work, and plant operations.

Based on discussions and interviews conducted with plant employees from various departments, the inspectors determined that personnel at the site felt free to raise safety concerns to management and use the CAP to resolve those concerns.

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REPORT DETAILS

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution

a. Assessment of the Corrective Action Program

(1) Inspection Scope

The inspectors reviewed the licensee's CAP procedures which described the administrative process for initiating and resolving problems primarily through the use of condition reports (CRs). To verify that problems were being properly identified, appropriately characterized, and entered into the CAP, the inspectors reviewed CRs that had been issued between November 2009 and September 2011, including a detailed review of selected CRs associated with the following risk-significant systems: RHR Service Water, Reactor Core Isolation Cooling, 4160V Emergency Busses, and the Emergency Diesel Generators (EDGs). Where possible, the inspectors independently verified that the corrective actions were implemented as intended. The inspectors also reviewed selected common causes and generic concerns associated with root cause evaluations to determine if they had been appropriately addressed. To help ensure that samples were reviewed across all cornerstones of safety identified in the NRC's Reactor Oversight Process, the inspectors selected a representative number of CRs that were identified and assigned to the major plant departments, including operations, maintenance, engineering, health physics, emergency preparedness, fire protection, and security. These CRs were reviewed to assess each department's threshold for identifying and documenting plant problems, thoroughness of evaluations, and adequacy of corrective actions. The inspectors reviewed selected CRs, verified corrective actions were implemented, and attended meetings where CRs were screened for significance to determine whether the licensee was identifying, accurately characterizing, and entering problems into the CAP at an appropriate threshold.

The inspectors conducted plant walkdowns of equipment associated with the selected systems and other plant areas to assess the material condition and to look for any deficiencies that had not been previously entered into the CAP. The inspectors reviewed CRs, maintenance history, completed work orders (WOs) for the systems, and reviewed associated system health reports. These reviews were performed to verify that problems were being properly identified, appropriately characterized, and entered into the CAP. Items reviewed generally covered a two-year period of time; however, in accordance with the inspection procedure, a five-year review was performed for selected systems for age-dependent issues.

Control Room walkdowns were also performed to assess the main control room deficiency list and to ascertain if deficiencies were entered into the CAP. Operator Workarounds and Operator Burden screenings were reviewed, and the inspectors

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verified compensatory measures for deficient equipment which were being implemented in the field. The inspectors conducted a detailed review of selected CRs to assess the adequacy of the root-cause and apparent-cause evaluations of the problems identified. The inspectors reviewed these evaluations against the descriptions of the problem described in the CRs and the guidance in licensee procedure NMP-GM-002-006, "Root Cause Analysis Instruction," and NMP-GM-002-007, "Apparent Cause Determination Instruction." The inspectors assessed if the licensee had adequately determined the causes of identified problems, and had adequately addressed operability, reportability, common cause, generic concerns, extent-of-condition, and extent-of-cause. The review also assessed if the licensee had appropriately identified and prioritized corrective actions to prevent recurrence.

The inspectors reviewed selected industry operating experience items, including NRC generic communications to verify that they had been appropriately evaluated for applicability and that issues identified through these reviews had been entered into the CAP.

The inspectors reviewed site trend reports to determine if the licensee effectively trended identified issues and initiated appropriate corrective actions when adverse trends were identified.

The inspectors attended various plant meetings to observe management oversight functions of the corrective action process. These included CAP coordinator (CAPCo) screening meetings and Management Review Committee meetings.

Documents reviewed are listed in the Attachment.

(2) Assessment

Identification of Issues

The inspectors determined that the licensee was generally effective in identifying problems and entering them into the CAP and that there was a low threshold for entering issues into the CAP. This conclusion was based on a review of the requirements for initiating CRs as described in licensee procedure NMP-GM-002-001, "Corrective Action Program Instructions," management's expectation that employees were encouraged to initiate CRs for any reason, and the relatively few number of deficiencies identified by inspectors during plant walkdowns not already entered into the CAP. Trending was generally effective in monitoring equipment performance. Site management was actively involved in the CAP and focused appropriate attention on significant plant issues.

Based on reviews and walkdowns of accessible portions of the selected systems, the inspectors determined that system deficiencies were being identified and placed in the CAP.

Prioritization and Evaluation of Issues

Based on the review of CRs sampled by the inspection team during the onsite period, the inspectors concluded that problems were generally prioritized and evaluated in accordance with the licensee's CAP procedures as described in the severity level determination guidance in NMP-GM-002-001. Each CR was evaluated and their associated corrective action reports (CARs) or technical evaluations (TEs) were assigned a severity level at the CAPCo meeting, and adequate consideration was given to system or component operability and associated plant risk.

The inspectors determined that station personnel had conducted root cause and apparent cause analyses in compliance with the licensee's CAP procedures and assigned cause determinations were appropriate, considering the significance of the issues being evaluated. A variety of formal causal-analysis techniques were used, depending on the type and complexity of the issue, consistent with NMP-GM-002-006 and NMP-GM-002-007.

The inspectors identified one performance deficiency associated with the licensee's prioritization and evaluation of issues. This issue was screened in accordance with Manual Chapter 0612, "Issue Screening," and was determined to be of minor significance and not subject to enforcement action in accordance with the NRC's Enforcement Policy.

- The inspectors identified one example of a CAR (191253) which had not been prepared in accordance with licensee procedure NMP-GM-002-001, Step 6.4.7.3, Version 24.0, dated June 8, 2011. Specifically, the basic cause determination was not included in the solutions tab or attached to the CAR. The inspectors confirmed that the basic cause determination had been conducted at the time. The licensee initiated CR 355302 to address the issue.

The inspectors also observed a discrepancy between information contained in the CAP program and the licensee's technical position related to EDG fuel oil leakage. Multiple historical CRs and EDG System Health Reports described a long-standing fuel oil leakage issue on the EDGs which had not been corrected and which were documented as a potential fire hazard in the EDG room. After a visual inspection of the condition and a review of additional information, not contained in the historical CRs, the inspectors agreed with the licensee's assessment that the small volume of fuel oil leakage did not affect the operability of the diesel and did not represent a significant fire hazard. The licensee initiated CR 351608 and CR 355721 to address the issue.

Effectiveness of Corrective Actions

Based on a review of corrective action documents, interviews with licensee staff, and verification of completed corrective actions, the inspectors determined that overall, corrective actions were timely, commensurate with the safety significance of the issues, and effective, in that conditions adverse to quality were corrected and non-recurring,

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notwithstanding the EDG issue discussed above. For significant conditions adverse to quality, the corrective actions directly addressed the cause and effectively prevented recurrence in that a review of performance indicators, CRs, and effectiveness reviews demonstrated that the significant conditions adverse to quality had not recurred. Effectiveness reviews for corrective actions to prevent recurrence were sufficient to ensure corrective actions were properly implemented and were effective. The inspectors identified two performance deficiencies associated with the licensee's effectiveness of corrective actions. These issues were screened in accordance with Manual Chapter 0612, "Issue Screening," and were determined to be of minor significance and not subject to enforcement action in accordance with the NRC's Enforcement Policy.

- The inspectors identified one instance (CR 2010109818) where an effectiveness review was not conducted for an NRC non-cited violation (NCV 2010003-03, Failure to follow procedure while in shutdown cooling to record corrected reactor water level) as required by NMP-GM-002-007, Step 6.3, Version 4.0, dated June 1, 2011. The licensee initiated CR 353966 to address the issue.
- The inspectors identified appropriate management review of multiple Priority 1 & 2 TEs had not been completed prior to closing the TEs as required by NMP-GM-002-001, Step 6.16.2.1, Version 24.0, dated June 8, 2011. The licensee initiated CR 355315 to address the issue.

(3) Findings

No findings were identified.

b. Assessment of the Use of Operating Experience (OE)

(1) Inspection Scope

The inspectors examined licensee programs for reviewing industry operating experience, reviewed licensee procedure NMP-GM-008, "Operating Experience Program," and reviewed the licensee's operating experience database to assess the effectiveness of how external and internal operating experience data was handled at the plant. In addition, the inspectors selected operating experience documents (e.g., NRC generic communications, 10 CFR Part 21 reports, licensee event reports, vendor notifications, and plant internal operating experience items, etc.), which had been issued since November 2009, to verify whether the licensee had appropriately evaluated each notification for applicability to the Hatch plant, and whether issues identified through these reviews were entered into the CAP. Procedure NMP-GM-008 was reviewed to verify that the requirements delineated in the program were being implemented at the station. Documents reviewed are listed in the Attachment.

(2) Assessment

Based on a review of documentation related to the review of operating experience issues, the inspectors determined that the licensee was generally effective in screening operating experience for applicability to the plant. Industry OE was evaluated by plant OE Coordinators and relevant information was then forwarded to the applicable department for further action or informational purposes. OE issues requiring action were entered into the CAP for tracking and closure. In addition, operating experience was included in all root cause evaluations in accordance with licensee procedure NMP-GM-002-006.

The inspectors identified one performance deficiency associated with the licensee's use of operating experience. This issue was screened in accordance with Manual Chapter 0612, "Issue Screening," and was determined to be of minor significance and not subject to enforcement action in accordance with the NRC's Enforcement Policy.

- The inspectors identified multiple examples of NRC Information Notices issued since November 2009 in which the licensee had not documented their evaluation in a CR as required by procedure NMP-GM-008, Attachment 1, Version 12.0, dated March 23, 2011. The licensee provided information which showed that those NRC Information Notices were evaluated by the OE Screening Board and determined to be not-applicable to Plant Hatch. The licensee initiated CR 355300 to address the issue.

(3) Findings

No findings were identified.

c. Assessment of Self-Assessments and Audits

(1) Inspection Scope

The inspectors reviewed audit reports and self-assessment reports, including those which focused on problem identification and resolution, to assess the thoroughness and self-criticism of the licensee's audits and self assessments, and to verify that problems identified through those activities were appropriately prioritized and entered into the CAP for resolution in accordance with licensee procedure NMP-GM-003-001, "Self Assessment Instructions." The inspectors also conducted a review of the licensee's 2010 Safety Culture self-assessment associated with the NRC's IP 95002 inspection performed in August 2010.

(2) Assessment

The inspectors determined that the scopes of assessments and audits were adequate. Self-assessments were generally detailed and critical, as evidenced by findings consistent with the inspector's independent review. The inspectors verified that CRs were created to document all areas for improvement and deficiencies resulting from the self-assessments, and verified that actions had been completed consistent with those recommendations. Generally, the licensee performed evaluations that were technically accurate. Site trend reports were thorough and a low threshold was established for evaluation of potential trends, as evidenced by the CRs reviewed that were initiated as a result of adverse trends.

(3) Findings

No findings were identified.

d. Assessment of Safety-Conscious Work Environment

(1) Inspection Scope

The inspectors randomly interviewed 16 on-site workers regarding their knowledge of the corrective action program at Hatch and their willingness to write CRs or raise safety concerns. During technical discussions with members of the plant staff, the inspectors conducted interviews to develop a general perspective of the safety-conscious work environment at the site. The interviews were also conducted to determine if any conditions existed that would cause employees to be reluctant to raise safety concerns. The inspectors reviewed the licensee's Quality Concerns Program (QCP) and interviewed the Concerns Coordinator. Additionally, the inspectors reviewed a sample of QCP issues to verify that concerns were being properly reviewed and identified deficiencies were being resolved and entered into the CAP when appropriate.

(2) Assessment

Based on the interviews conducted and the CRs reviewed, the inspectors determined that licensee management emphasized the need for all employees to identify and report problems using the appropriate methods established within the administrative programs, including the CAP and QCP. These methods were readily accessible to all employees. Based on discussions conducted with a sample of plant employees from various departments, the inspectors determined that employees felt free to raise issues, and that management encouraged employees to place issues into the CAP for resolution. The inspectors did not identify any reluctance on the part of the licensee staff to report safety concerns.

(3) Findings

No findings were identified.

4OA6 Meetings, Including Exit

On September 29, 2011, the inspectors presented the inspection results to Mr. Dennis Madison and other members of the site staff. The inspectors confirmed that all proprietary information examined during the inspection had been returned to the licensee.

ATTACHMENT: SUPPLEMENTAL INFORMATION

Enclosure

KEY POINTS OF CONTACT

Licensee personnel:

T. Beckworth, Concerns Coordinator
B. Bowers, Engineer I - Systems
C. Clark, Engineer II
F. Goreley, Shift Manager
B. Hulett, Site Design Manager
D. Madison, Vice President
L. Mikulecky, Corrective Action Program Supervisor
C. Morrison, Maintenance I&C Supervisor
R. Outler, Cause Analyst
A. Owens, Senior Engineer - Systems
K. Pownall, Senior Engineer - Programs
C. Sexton, RHR/CS System Engineer
S. Tipps, Principal Licensing Engineer
K. Underwood, Process Improvement Supervisor
A. Vora, Senior Engineer – Maintenance Engineering

NRC personnel:

E. Morris, Senior Resident Inspector
D. Hardage, Resident Inspector
G. Hopper, Chief, Branch 7, Division of Reactor Projects

LIST OF REPORT ITEMS

Opened and Closed

None

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Procedures

51GM-MNT-033-0, Torque of Pressure Boundary Applications, Version 11.8
 DS-PE-014, Shelf Life Determination, Version 8.0
 NMP-AD-012, Operability Determinations and Functionality Assessments, Version 10.0
 NMP-AD-012-GL01, Prompt Determination of Operability Guideline, Version 3.0
 NMP-AD-012-GL02, Functionality Assessment Guideline, Version 3.0
 NMP-AD-030, Licensee Event Report, Version 1.0
 NMP-ES-002, System Monitoring and Health Reporting, Version 14.0
 NMP-GM-002, Corrective Action Program, Version 12.0
 NMP-GM-002-001, Corrective Action Program Instructions, Version 24.0
 NMP-GM-002-002, Effectiveness Review Instructions, Version 1.0
 NMP-GM-002-006, Root Cause Analysis Instruction, Version 3.0
 NMP-GM-002-007, Apparent Cause Determination Instruction, Version 4.0
 NMP-GM-002-008, Common Cause Analysis Instruction, Version 1.0
 NMP-GM-002-GL03, Cause Analysis and Coding Guideline, Version 16.0
 NMP-GM-003, Self Assessment Procedure, Version 17.0
 NMP-GM-003-001, Self-Assessment Instructions, Version 1.0
 NMP-GM-008, Operating Experience Program, Version 12.0
 NMP-MA-009-001, Foreign Material Exclusion Program Requirements, Version 5.0
 SCM-005, Warehouse Operations, Version 28.0
 Southern Nuclear Company Concerns Program Procedure, Version 11

Condition Reports (CRs)

2000008141	2009200449	2010106349	2010112722
2004200601	2009200450	2010106403	2010112733
2006105983	2009200452	2010107224	2010112748
2008103067	2009200479	2010107421	2010112784
2008107432	2009200480	2010109137	2010112917
2009101206	2010101158	2010109138	2010113237
2009102221	2010101596	2010109168	2010113917
2009104764	2010101704	2010109197	2010114087
2009105460	2010102362	2010109251	2010114090
2009106352	2010102363	2010109278	2010114255
2009110603	2010103338	2010109591	2010114256
2009110684	2010104298	2010109823	2010114257
2009110685	2010104355	2010109826	2010114660
2009110928	2010104356	2010109828	2010115127
2009111080	2010104615	2010110986	2010115389
2009111093	2010104968	2010112042	2010115453
2009111187	2010105161	2010112170	2010115866
2009111209	2010105980	2010112512	2010115876
2009111281	2010105982	2010112513	2010116039
2009111286	2010106005	2010112514	2010116114
2009111523	2010106006	2010112655	2010200503
2009111808	2010106007	2010112656	2011100159
2009111823	2010106225	2010112658	2011100597
2009111828	2010106262	2010112696	2011100698

2011100775	2011201422	110409	340684
2011100879	2011202189	110411	341750
2011100880	89460	110412	342460
2011100881	89813	110864	342466
2011100882	90544	113710	342469
2011100883	91427	113711	343711
2011100884	93293	113734	344138
2011100983	96812	113925	344144
2011101045	99229	114259	344145
2011101524	99735	191519	344176
2011101593	99933	283022	344186
2011101680	101038	284223	344191
2011101966	102366	284985	344195
2011101968	103469	286479	344199
2011102020	104305	287808	344200
2011102166	104319	325190	344204
2011102169	104938	329147	344205
2011102190	105016	331786	344206
2011103056	105699	333255	344212
2011106833	105709	335479	344237
2011106874	107285	337677	350426
2011201420	108731	338203	
2011201421	110327	339236	

Technical Evaluations (TEs)

TE 219026

Work Orders (WOs)

SNC101774

SNC101775

SNC101776

WO1000298501

WO1000298601

WO1030109601

WO1040392001

WO1050111201

WO1062104801

WO1062105001

WO2000246201

WO2000298301

WO2051465504

WO2051465508

WO2101281010

Drawings

H-13588, Contact Tabulation Diesel Generators Controls Sheet 2 of 2, Rev. 14

H-23775, Elementary Diagram – 2R43B Diesel Generator 2B Sh. 3 of 7, Rev. 14

Self-Assessments and Audits

H-CAP-2010, Fleet Oversight Audit of Corrective Action Program, dated April 1, 2010
 H-ENG-2010, Fleet Oversight Audit of Engineering Support, dated January 25, 2011
 H-HP-2011, Fleet Oversight Audit of Health Physics, dated August 2, 2011
 H-ISFSI-2010, Fleet Oversight Audit of Independent Spent Fuel Storage Installation, dated
 September 27, 2010
 H-MNT-2009, Fleet Oversight Audit of Maintenance, dated December 31, 2009
 Hatch 2011 NRC PI&R Self Assessment, dated August 16, 2011

Other Documents

Plant Hatch System Health Report – Appendix R Emergency Lights (1R42-2R42), 2nd Quarter
 2011
 Plant Hatch System Health Report – Core Spray System (1E21-2E21), 2nd Quarter 2011
 Plant Hatch System Health Report – Emergency Diesel Generators (1R43-2R43), 2nd Quarter
 2011
 Plant Hatch System Health Report – Fire Systems (1L43-2L43), 2nd Quarter 2011
 Plant Hatch System Health Report – Plant Service Water System (1P41-2P41), 2nd Quarter
 2011
 Plant Hatch System Health Report – Residual Heat Removal System (1E11-2E11), 2nd Quarter
 2011
 Plant Hatch System Health Report – Station Auxiliary AC Power Systems (1R20AC-2R20AC),
 2nd Quarter 2011
 SX-13147 Diesel Generator Service Manual, 08/03/2010
 EDG Fuel Oil Sample Results
 EDG Fuel Oil Leakage White Paper

CRs generated as a result of Inspection

351608, Inaccurate System Health Report for EDGs
 352105, Affect of high noise level on the HP technicians stationed at the Control Bldg 112 RCA
 352145, Smoke seen while performing 1C EDG Surveillance
 353966, Action Item or TE was not generated for effectiveness review for CR 2010109828
 354754, NRC Walkdown - Water in RHRSW Pump Moats
 354758, NRC Walkdown - Strainer Nut/Bolt
 354764, NRC Walkdown - Bent RHR Snubber Rod
 355252, Maximo data conversion error - CR 108819 contains TE 69894 on related records tab
 355300, NMP-GM-008 implies CRs will be written for all NRC INs
 355302, CAR 191253 BCD was not performed correctly
 355315, Repeat Issue with Management Review of Pri 1 and 2 Tech Evals
 355432, PCB formal inspection process needed
 355721, Accuracy and completeness of CR and system health report information