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In Reply Refer To:
Docket: 50-285/85-07

MAY 28 1985

Omaha Public Power District
ATTN: R. L. Andrews, Division Manager-
Nuclear Production
1623 Harney Street
Omaha, Nebraska 68102

Gentlemen:

Enclosed are Attachments 1 and 2 which were inadvertantly ommitted from the Systematic Assessment of Licensee Performance Report.

Sincerely,

"Original Signed By:
L. E. MARTIN"

Dorwin R. Hunter, Chief
Reactor Project Branch 2

Enclosure:
As stated

cc:
W. G. Gates, Manager
Fort Calhoun Station
P. O. Box 399
Fort Calhoun, Nebraska 68023

Harry H. Voigt, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, NW
Washington, DC 20036

Kansas Radiation Control Program Director

Nebraska Radiation Control Program Director

bcc to DMB (~~IE01~~)
bcc distrib. by RIV:

*RPB2	*Resident Inspector	R. D. Martin, RA
*EP&RPB	*Section Chief (RPB2/A)	*MIS System
*RIV File	R. Denise, DRSP	*RSTS Operator

- all RRIs at all sites
- Records Center, INPO
- J. Taylor, D/IE
- Chmn. Palladino (MS: H-1144)
- Comm. T. M. Roberts (MS: H-1149)
- Comm. J. K. Asselstine (MS: H-1149)
- Comm. F. M. Bernthal (MS: H-1149)
- Comm. L. W. Zech (MS: H-1149)

IE40

RIV:RPB2/A	RPB2	
LEMartin:gd	DRHunter	
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Attachment 1

Docket No. 50-285

FACILITY: Fort Calhoun Station, Unit No. 1

LICENSEE: Omaha Public Power District

EVALUATION PERIOD: September 1, 1983 to February 28, 1985

PROJECT MANAGER: Ed Tourigny

I. INTRODUCTION:

This report contains NRR's input to the SALP review for the Fort Calhoun Station, Unit No. 1. The assessment of the licensee's performance was conducted according to NRR Office Letter No. 44, NRR Inputs to SALP Process, dated January 3, 1984. This Office Letter incorporates NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

II. SUMMARY

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category (Category 1, 2 or 3) based on a composite of a number of attributes. The performance of the Omaha Public Power District in the functional area of Licensing Activities is rated Category 2.

III. CRITERIA

The evaluation criteria used in this assessment are given in NRC Manual Chapter 0516 Appendix, Table 1, Evaluation Criteria with Attributes for Assessment of Licensee Performance.

IV. METHODOLOGY

This evaluation represents the integrated inputs of the Operating Reactor Project Manager (ORPM) and those technical reviewers who expended significant amounts of effort on the Fort Calhoun Station licensing actions during the current rating period. Using the guidelines of NRC Manual Chapter 0516, the ORPM and each reviewer applied specific evaluation criteria to the relevant licensee performance attributes, as delineated in Chapter 0516, and assigned an overall rating category (1, 2 or 3) to each attribute. The reviewers included this information as part of Safety Evaluation Reports transmitted to the Division of Licensing. The ORPM, after reviewing the inputs of the technical reviewers, combined this information with his own assessment of licensee performance and, using appropriate weighting factors, arrived at a composite rating for the licensee. This rating also reflected the comments of the NRR Senior Executive assigned to the Fort Calhoun Station, Unit No. 1 SALP assessment. A written evaluation was then prepared by the ORPM and circulated to NRR management for comments which were incorporated in the final draft.

The basis for this appraisal was the licensee's performance in support of licensing actions that were either completed or had a significant level of activity during the current rating period. These actions, consisting of amendment requests, exemption requests, relief requests, responses to generic letters, TMI items, and other actions, are classified as follows:

- 10 Multi-Plant Actions (9 completed). Included in this category are

  - EQ of Safety Related Electrical Equipment, B-60, Completed
  - Masonry Wall Design Review, B-59, Completed
  - Adequacy of Station Electrical Distribution Voltages, B-48, Completed
  - Control of Heavy Loads, Phase I, C-10, Completed
  - Asymmetric LOCA Loads, D-10, Completed
  - Plans for Preventing Exceeding PTS Screening Criteria, B-73, Completed
  - Natural Circulation Cooldown, B-66, Completed
  - TSs In Response to GL-82-16, NUREG-0737, B-72, Completed
  - TSs In Response to GL-82-37, NUREG-0737, B-83, Completed
  - Appendix I Tech.Spec.Implementation Review, A-02

- 24 Plant Specific Actions (17 Completed). Included in this category are

  - Evaluation of Neutron Source Data for Neutron Flux Reduction Verification, Completed
  - Relief from ISI 1st Ten Year Program, Completed
  - Second Interim Schedular Relief From IST 2nd Ten Year Program, Completed
  - Plant Support and Plant Organizational TS Changes, Completed
  - Update Surveillance Capsules Removal Schedule TS and Update Snubber Listing TS, Completed
  - Steam Generator B Major Leakage Event Evaluation, Completed
  - Evaluation of Licensee's Position on AFW System Pump Testing Frequency, Completed
  - Evaluation of Methodology Reports for Reloads, Completed
  - First EQ Deadline Time Extension, Completed
  - Evaluation of SCU Methodology for Reloads, Completed
  - Shift Manning and QC Personnel TS Changes, Completed
  - Thermal Shield Review, Completed
  - Cycle 9 Startup Evaluation, Completed
  - Evaluation Related to GL-82-17 and GL-82-23, Completed
  - Administrative TS Changes, Completed
  - Spent Fuel Pool Rerack TS Changes, Completed
  - First Interim Schedular Relief From IST 2nd Ten Year Program, Completed
  - TS on Inoperability of RPS/ESFAS Channels
  - Appendix R Exemption Requests (Outside Containment)
  - Appendix R Exemption Requests (Inside Containment)
  - Steam Generator Mid-Cycle Tube Inspection Waiver
  - Re-Evaluation of Licensee's Position on AFW System Pump Testing Frequency
  - Second EQ Deadline Time Extension
  - Administrative TS Changes as a Result of Rule Changes

- 14 TMI (NUREG-0737) Actions (8 Completed). Included in this category are:

° Thermal Mechanical Report, F-30, Completed
° Auto PORV Isolation, F-36, Completed
° Report on PORV Failures, F-37, Completed
° Potential For Voiding in RCS, F-33, Completed
° RCS High Point Vents, F-10, Completed
° Post Accident Sampling Modifications, F-12, Completed
° NUREG-0737 Supplement 1 Confirmatory Order, Completed
° Detailed Control Room Design Review Program Plan, F-08, Completed
° Inadequate Core Cooling Instrumentation, F-26
° Detailed Control Room Design Review Summary Report Including In-Progress Audit, F-71
° Safety Parameter Display System, F-9
° Technical Support Center, F-63
° Operation Support Center, F-64
° Emergency Operations Facility, F-65

V. ASSESSMENT OF PERFORMANCE ATTRIBUTES

The licensee's performance evaluation is based on consideration of seven attributes as specified in NRC Manual Chapter 0516. For most of the licensing actions considered in this evaluation, only three of the attributes were of significance. Therefore, the composite rating is heavily based on the following attributes:

- Management Involvement and Control in Assuring Quality
- Approach to Resolution of Technical Issues from a Safety Standpoint
- Responsiveness to NRC Initiatives.

With the exception of Enforcement History, for which there was no basis within NRR for evaluation, the remaining attributes of

- Reporting and Analysis of Reportable Events
- Staffing (Including Management)
- Training and Qualification Effectiveness

were judged to apply only to a few licensing activities.

A. Management Involvement and Control in Assuring Quality

The licensee's management has demonstrated a high level of involvement and control in assuring quality. Regarding multi-plant actions, the licensee's management became highly involved in resolving issues such as Environmental Qualification of Electrical Equipment, Adequacy of Station Electrical Distribution Voltages, Control of Heavy Loads - Phase 1, and Pressurized Thermal Shock Screening Criteria. Although the technical specifications for Appendix I have not been implemented yet, the licensee's management was heavily

involved in resolving the issues. There is currently one multi-plant action for which we believe a higher level of management involvement and control is necessary. It deals with masonry walls. Plant modifications regarding masonry walls should have been done by December 31, 1984. The current schedule calls for all work to be done by the end of the 1985 refueling outage.

In regard to management involvement and control insofar as plant specific actions are concerned, the licensee's management took appropriate steps in resolving most of the issues. The licensee's management assured that the station had a sound inservice inspection program for the second ten year period. In those cases where the licensee determined the ASME Code to be impractical, relief was requested. The licensee's management realized that they had a problem in environmentally qualifying certain electrical equipment, and asked for a time extension. When the licensee's management realized that the equipment could not be qualified by testing, they took immediate steps to modify the equipment that would be needed for the large break loss of coolant accident and requested a time extension for the remaining equipment. Technical specification changes in relationship to reloads have become more complicated over the years. In order to permit the reviews associated with reloads to become more straightforward, the licensee submitted methodology reports on reloads. These were reviewed and approved by the staff. As a result, the reload review performed during the evaluation period was more straightforward. Future reload reviews should also be more straightforward. A major steam generator tube leakage occurred during the evaluation period, and the licensee's management was highly involved in resolving all the issues. The licensee's management took an aggressive approach in addressing the generic thermal shield problem. Although no problems were found with the Fort Calhoun thermal shield, the licensee's management committed to perform a detailed thermal shield inspection no later than the 1987 refueling outage.

There were a number of plant specific actions where the licensee's management took significant steps in resolving, although the reviews are not yet complete. These dealt with the inoperability of RPS/ESFAS channels and the Appendix R exemptions. These reviews should be completed in the next evaluation period. There are a number of other active plant specific actions where the licensee's management could have become more involved, e.g. the testing frequency of the auxiliary feedwater pumps, upgrading the plant's technical specifications to be consistent with the new LER rule. We expect resolution on these issues during the next evaluation period.

In regard to management involvement and control as far as TMI actions are concerned, the licensee's management has taken many steps in getting the systems installed and operational. Examples include RCS vents, PASS, containment monitors for hydrogen, water, radiation and pressure, and toxic gas monitors. In addition, many of the NUREG-0737 technical specification changes have been applied for by the licensee and have been issued by the staff. Examples include RCS vents and containment monitors for hydrogen, water, radiation and pressure. We hope to see the remaining NUREG-0737 systems installed and made operational in a timely manner and the technical specification change applications applied for in a reasonable period of time after declaring the systems operational. Many of the systems are under confirmatory order to be made operational by agreed to dates.

Based upon the above evaluation, a rating of category 1 is assigned to this attribute.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

The licensee has demonstrated resolution of technical issues from a safety standpoint. Regarding multi-plant actions, many difficult licensing issues were resolved during the evaluation period. Examples include Environmental Qualification, Control of Heavy Loads - Phase 1, and Pressurized Thermal Shock Screening Criteria. Although the technical specifications for Appendix I have not been implemented yet, the technical issues have been resolved.

In regard to resolution of technical issues insofar as plant specific items are concerned, many major licensing issues were resolved during the evaluation period, and many are near resolution. The major ones resolved include Steam Generator Integrity, Reload Methodology, Thermal Shield Integrity, and Spent Fuel Pool Reracking. A major steam generator tube leakage occurred during the evaluation period. Much staff/licensee technical interface occurred before the licensee was authorized to restart the Station. The crux of the issue was what caused the leakage and would it happen again. It was determined that intergranular stress corrosion cracking was the cause of the failure. It is impossible to state whether it will happen again; however, the licensee inspected almost all the tubes in both generators, performed a double verification of the results, upgraded the secondary water chemistry program, implemented an enhanced condenser inspection and repair program, and committed to a more detailed steam generator inspection program during the next refueling outage. The number of tubes to inspect was a technical issue in the earlier stages of the review and the licensee agreed to inspect all that were accessible by the remote probe insertion machine. As stated in the previous evaluation on management involvement, reload technical specification changes became more difficult to review. Much technical work was performed on the part of the licensee to develop and implement reload methodology reports. Much technical work was performed by the staff to review and approve the reports. We believe that the processing of reload applications will be more straightforward in the future because the licensee now has an approved methodology and the staff has a good appreciation on how the licensee performs the safety analyses. The integrity of the licensee's thermal shield was a tough licensing issue during the evaluation period. Although the shield was demonstrated by inspection to be in good condition and the licensee provided analysis to show that if the shield failed during operation no safety question would arise, the licensee committed to perform another detailed inspection no later than the 1987 refueling outage to prove that the shield continues to be in good condition. The authorization to rerack the spent fuel pool was issued early in the evaluation period and the storage capacity assuming full core discharge capability exists until the year 1996. It should be noted that this was one of the first authorizations to rerack the spent fuel pool using two fuel zones: one fuel zone containing neutron poison material (boraflex) and one fuel zone without neutron poison material.

The plant specific issues that are nearly complete are the technical specifications on RPS/ESFAS channel inoperability and Appendix R exemption requests. Technical issues still remain on the auxiliary feedwater system pump testing frequency; it is hoped that this technical issue will be resolved during the next evaluation period. It is believed that the licensee can develop a better rationale for testing the pumps on a quarterly frequency versus the staff requested monthly frequency.

In regard to resolution of technical issues relating to TMI actions, the licensee has resolved all the issues discussed to date and, as stated previously, many of the technical specifications are in place. The bulk of the outstanding TMI related work should be completed in the next evaluation period. It was stated previously that the license is under a confirmatory order to complete most of these items.

On the basis of the above observations, a rating of category 1 is assigned to this attribute.

C. Responsiveness to NRC Initiatives

The licensee is responsive to NRC initiatives. The licensee realized early in the evaluation period that many licensing actions were outstanding for a number of years and committed to cleaning up the backlog. We are pleased to say that much of the backlog was cleaned up. Regarding multi-plant actions, all of the backlog which the licensee had control over was cleaned up except the Appendix I technical specifications. It should be noted that the technical and managerial issues are resolved for Appendix I; all that needs to be done is for the staff to issue the technical specifications. It should also be noted that there are some backlog multi-plant actions over which the licensee had no control during the evaluation period. These include thirteen reviews associated with the Salem ATWS event (GL-83-28). The licensee submitted the responses during the evaluation period on the requested schedule; the responses are under review.

Insofar as plant specific actions are concerned, many of these were completed during the evaluation period and some are near completion. The only criticism we have regarding the licensee's responses to NRC initiatives are the issues on the auxiliary feedwater (AFW) system pump testing frequency and the technical specifications relating to the LER rule. A letter was sent to the licensee in October 1984 requesting a meeting to discuss and resolve the AFW system pump testing frequency issue. The licensee has not responded in writing as of February 28, 1985, the end of the evaluation period. In addition, the licensee was requested in May 1984 to submit more straightforward technical specifications regarding the LER rule. The licensee has not responded as of February 28, 1985, the end of the evaluation period.

Regarding TMI items, the licensee has placed many of the systems in operation and the technical specifications for many of the systems were put in place during the evaluation period. The bulk of the remaining systems are under confirmatory order to be made operational during the next evaluation period. Most of the licensee's responses to NRC initiatives in the TMI area have been completed, and the remaining completions are in sight.

In order to provide higher quality submittals to the staff, the licensee took the initiative and established a separate review group during the evaluation period. This group reviews all significant licensee submittals for accuracy. However, we have noted in some instances that the licensee submittals have been delayed because of this augmented process. We expect such cases to be the exception and not the rule.

On the basis of the above considerations, a rating of category 2 is assigned to this attribute.

D. Enforcement History

No basis exists for an NRR evaluation of this attribute.

E. Reporting and Analysis of Reportable Events

The licensee continues to keep the NRR staff informed in a timely manner of all significant events at the plant whether they are reportable or not. Although reportable events are discussed in detail elsewhere in the NRC evaluation, we believe that NRR comments are worthwhile, especially when they highlight good licensee practices. Examples of events that were reported to the staff were a control rod drive mechanism operability problem, minor primary to secondary leakage in steam generator B, major failure of a tube in steam generator B, transformer fire in the switchgear room, temporary loss of the 161 kV line, gaseous radioactivity release in the auxiliary building, spent fuel pool reracking problem, and various VIAS actuations. Some of these events were not reportable but demonstrate that the licensee keeps the staff informed of significant events. The staff appreciates such information and hopes that this practice will continue.

On the basis of the above observations, a rating of category 1 is assigned to this attribute.

F. Staffing (Including Management)

The licensee has shown significant initiative in the staffing area during the evaluation period. Although staffing is discussed in other sections of the NRC evaluation, we believe that NRR comments are worthwhile since, in this case, the initiatives are highly noteworthy.

The licensee implemented a higher level of corporate oversight of the Fort Calhoun Station during this evaluation period. In the past, the plant managers for the coal and nuclear electrical production stations reported through the Section Manager of Operations to the Division Manager, Production Operations. A new Division Manager of Nuclear Production position was authorized and filled. The new Division Manager is responsible for the Fort Calhoun Station, and the Fort Calhoun Station plant manager reports directly to him. We have noted that since the change was made, the Division Manager has become more involved in the management of the plant and issues related to the plant. As an example, we have noted that the Division Manager visits the plant on a higher frequency and interacts more with the plant staff. As another example, we have noted more involvement of the Division Manager in significant licensing issues. The Station's technical specifications were amended during the evaluation period to reflect this new initiative.

The licensee implemented new staffing initiatives at the Fort Calhoun Station also. Two new positions have been added to the staff of the Supervisor-Chemical and Radiation Protection: Radioactive Waste Coordinator and ALARA Coordinator. These positions have been filled. The Supervisor-Training position was elevated to the position of Supervisor-Station Training and this person now reports to the station manager. More full time trainers were also added to the Station complement. The licensee took steps to ensure that it met the upgraded NRC regulations on shift manning that became effective on January 1, 1984. The licensee did not have to request an exemption. Lastly, the Quality Control (QC) personnel reported to the Maintenance Supervisor. They now report to the

Technical Supervisor. This change allowed the QC personnel to have a higher level of independence from the maintenance department. The plant's technical specifications were amended during the evaluation period to reflect these new initiatives.

The licensee also implemented new staffing initiatives in their corporate headquarters to further support the Fort Calhoun Station staff. As an example, additional resources were devoted to handle licensing issues.

Based on the above considerations, a rating of category 1 is assigned to this attribute.

VI. CONCLUSION

A complete performance rating of category 2 has been assigned by the NRR SALP evaluation effort for the rating period.

plan. The NRR staff with assistance from NMSS, IE Headquarters, and a Region IV representative relayed our concerns to the licensee. The licensee committed to perform an in-depth review of their security plan and to submit changes as warranted. The security of the Fort Calhoun Station remains a serious concern, and this will be re-reviewed in the next evaluation period.

Based upon the above considerations, a rating of category 3 is assigned to this attribute.

VI. CONCLUSION

A complete performance rating of category 1 has been assigned by the NRR SALP evaluation effort for the rating period.

Enclosure 2

Information to be added to
Section V of SALP Report -
"Supporting Data and Summary"

1. NRR/licensee Meetings

February 5-8, 1985,	In-Progress Audit of Licensee's Detailed Control Room Design Review
December 13, 1984,	Plant Security
May 29, 1984,	Steam Generator B Major Leakage Event
April 17, 1984 and October 12-13, 1983,	Radiological Effluent Technical Specifications
March 23, 1984,	Environmental Qualification
December 20, 1983,	SALP

2. NRR Site Visits

February 6-7, 1985,	Toured Control Room and Remote Shutdown Panel and Discussed Licensing Actions with Resident Inspector
August 27-29, 1984,	Toured Plant, Reviewed TMI Related Modifications, and Discussed Licensing Actions with Resident Inspector
May 23-26, 1984,	Emergency Trip to Address Steam Generator B Major Leakage Event
October 11 and 14, 1983,	Discussed Licensing Actions with Resident Inspector and Visited Local PDR.

3. Commission Briefings

None.

4. Schedular Extensions Granted

IST 2nd 10 year program, interim schedular relief for one year, October 9, 1984

IST 2nd 10 year program, interim schedular relief for one year, September 30, 1983

EQ Schedular Extension, May 18, 1984

5. Reliefs Granted

ISI 1st 10 year program, 2 reliefs, November 14, 1984

ISI 2nd 10 year program, 8 reliefs, April 6, 1984

IST 2nd 10 year program, 1 relief, September 30, 1983

6. Exemptions Granted

None.

7. License Amendments Issued

Amendment No. 85	Limit Overtime and Report PORV/SV Failures and Challenges, October 11, 1984
Amendment No. 84	Plant Support and Plant Organization Changes, September 7, 1984
Amendment No. 83	Update Surveillance Capsules Removal Schedule, September 7, 1984
Amendment No. 82	Add Operability and Surveillance Requirements for Containment Hydrogen, Water, and Pressure monitors, August 2, 1984
Amendment No. 81	Add Operability and Surveillance Requirements for Containment Wide Range Radiation Monitors, Wide Range Noble Gas Monitors, and Main Steam Lines Radiation Monitor, July 12, 1984
Amendment No. 80	Add Operability and Surveillance Requirements for RCS Vents and Administrative Requirements for Analysis of Plant Effluents, July 9, 1984
Amendment No. 79	Snubber Changes, May 23, 1984
Amendment No. 78	Shift Manning and QC Personnel Changes, May 16, 1984
Amendment No. 77	Cycle 9 Restart, April 26, 1984
Amendment No. 76	Administrative Changes, January 26, 1984
Amendment No. 75	Authorized Spent Fuel Pool Rerack, September 9, 1983

8. Emergency Technical Specifications Issued

None.

9. Orders Issued

Order confirming licensee commitments on emergency response capability as required by Supplement 1 to NUREG-0737, February 22, 1984

10. NRR/Licensee Management Conferences

None.

AEOD INPUT TO SALP REVIEW FOR FORT CALHOUN

The licensee submitted about 30 reports, plus updates, during the assessment period from September 1, 1983 to February 28, 1985. Our review included the following LER numbers:

83-008 to 83-013
84-001 to 84-025

The LER review followed the general instructions and procedures of NUREG-0161 and NUREG-1022. The specific review criteria and our findings follow:

1. LER Completeness

   a) Was the information in the LER Form sufficient to provide a good understanding of the event?

   1983 LERs

   The information in the two free-form narrative sections of the LER Form provided sufficient information for a clear and useful description of the occurrence, the direct consequences and the corrective action. The abstracts typically included specific details of the event such as valve identification numbers, model numbers, number of operable redundant systems, the date of completion of repairs, etc., to provide a good understanding of the event. The reports were easy to read and meaningful.

   Several LERs had overrunning narratives that might be a problem for future abstracting. Overrunning narratives are so unnecessary for Fort Calhoun because the supplemental information in the attachments to the LER Form are so consistently well written.

   1984 LERs

   The abstract described the major occurrences of the event, including all component or system failures that contributed to the event and the significant corrective actions taken or planned to prevent recurrence as stated in NUREG-1022.

b) Were the LERs coded correctly?

1983 LERS

We checked the codes that the licensee selected against the narrative description of the event for accuracy. We agreed with the licensee's entry in all coded fields.

1984 LERs

The above comments are applicable.

c) Was supplemental information provided when needed?

1983 LERs

Every report contained additional supplementary information in the form of attachments. The attachments were titled and consistently arranged with Attachment No. 1 as the safety analysis, Attachment No. 2 as the the corrective action, and Attachment No. 3 as the failure data.

The separate titles with specific information in each section led to a consistency from LER to LER that is not approached by other schemes of providing supplemental information. The safety analysis, even for minor events, was relevent and comprehensive. Perhaps it is simply easiest to say that they are the best written and most informative LERs that I have reviewed. These reports best represent how LERs should be written.

1984 LERs

The above comments are also applicable for 1984 LERs. The supplemental information is thorough, completely detailed and well written. They simply provide all the information that is required, LER after LER. We have no lingering questions about the event after reviewing one of these LERs.

d) Follow-up Reports

1983 LERs

The licensee only updated one report: LER 83-008. The area of new narrative information was stated by the licensee in the transmittal letter, but the coding rules of NUREG-0161 for updating LERs were not completely followed.

1984 LERs

Only LER 84-008 was updated. It provided new information and the portion that was revised was denoted by a vertical line in the right hand margin so the extent of the revision could easily be determined by the reader.

e) Were similar occurrences properly referenced?

1983 and 1984 LERs

The licensee stated the judgement criteria used to define similar events, the number of times the similar event occurred, and the previous LER numbers. In addition, when there have been no previous events, the licensee positively states that this is the first reportable occurrence of this type.

2. Multiple Event Reporting in a Single LER

The licensee submitted many LERs that combined multiple events of component actuations into a single report. These multiple events were combined correctly into a single LER in accordance with the guidelines of NUREG-0161 and NUREG-1022.

3. Prompt Notification Follow-up Reports

Five PNs were issued in this SALP assessment period. Three of the PNs described clearly unreportable events. The remaining two PNs were covered by multiple event LERs on the ventilation isolation actuation system, so the licensee appears to be reporting all events that are reportable.