



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
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July 30, 2013

Mr. Michael J. Pacilio
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President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: CLINTON POWER STATION - NRC INTEGRATED INSPECTION REPORT
05000461/2013-003**

Dear Mr. Pacilio:

On June 30, 2013, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Clinton Power Station. The enclosed report documents the inspection results, which were discussed on July 2, 2013, with Mr. B. Taber and other members of your staff.

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

Based on the results of this inspection, one self-revealed finding of very low safety significance was identified. The finding was determined to involve a violation of NRC requirements. Because of the very low safety significance and because it was entered into your corrective action program, the NRC is treating the above self-revealed violation as a Non-Cited Violation consistent with Section 2.3.2 of the NRC Enforcement Policy. If you contest the Non-Cited Violation you should provide a response within 30 days of the date of this inspection report, with the basis for your denial to the Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at Clinton Power Station. In addition, if you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement to the Regional Administrator, Region III, and the NRC Resident Inspector at Clinton Power Station.

M. Pacilio

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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 made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Document Access and Management 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/

Christine A. Lipa, Branch Chief
Branch 1
Division of Reactor Projects

Docket No. 50-461
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-461

License No: NPF-62

Report No: 05000461/2013-003

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station, Unit 1

Location: Clinton, IL

Dates: April 1 through June 30, 2013

Inspectors: B. Kemker, Senior Resident Inspector
D. Lords, Resident Inspector
S. Bell, Health Physicist
J. Draper, Reactor Engineer
D. McNeil, Senior Operations Engineer
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Management Agency

Approved by: C. Lipa, Chief
Branch 1
Division of Reactor Projects

Enclosure

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SUMMARY OF FINDINGS

Inspection Report (IR) 05000461/2013-003, 04/01/13 – 06/30/13, Clinton Power Station, Unit 1, Radiological Hazard Assessment and Exposure Controls.

This report covers a three-month period of inspection by the resident inspectors and announced baseline inspections by regional inspectors. One Green finding, which had an associated Non-Cited Violation, was identified. The significance of inspection findings is indicated by their color (i.e., greater than Green, or Green, White, Yellow, Red) and determined using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," dated June 2, 2011. Cross-cutting aspects are determined using IMC 0310, "Components within the Cross Cutting Areas," dated October 28, 2011. 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

Cornerstone: Occupational Radiation Safety

- Green. A self-revealing finding of very low safety significance (Green) and associated Non-Cited Violation of Technical Specification 5.4.1.a for the failure to follow procedures associated with the Radiation Work Permit (RWP) on March 28, 2013. The issue resulted in the unplanned intake of radioactive material by five workers. RWP 10014553, "2013 RW HRA/LHRA," Revision 0, established the requirement for the usage of high efficiency particulate air vacuums during the cleanup of a legacy radioactive resin spill. The licensee replaced this cleanup method with manual resin removal during the cleanup contrary to the conditions set in the RWP. This is a performance deficiency, which was within the licensee's ability to foresee and should have been prevented. The issue was entered into the licensee's corrective action program as Action Request 01494203. The licensee completed actions to ensure worker compliance with radiation protection program procedures.

The performance deficiency was determined to be more than minor safety significance in accordance with Inspection Manual Chapter (IMC) 0612, Appendix B, "Issue Screening," because it was associated with the program and process attribute of the Occupational Radiation Safety Cornerstone and affected the cornerstone objective of ensuring adequate protection of worker health and safety from exposure to radiation, in that, the workers received additional and unplanned dose from the intake of radioactive materials. The significance was determined in accordance with IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process." The inspectors determined the finding has very low safety significance (Green) because the finding did not involve: (1) As Low As Reasonably Achievable (ALARA) planning or work controls involving excessive occupational collective dose, (2) an overexposure, (3) a substantial potential for overexposure, or (4) compromised ability to assess dose. The primary cause of this finding was related to the cross-cutting aspect of human performance with the component of decision making. The licensee failed to use conservative assumptions in decision making and failed to adopt a requirement to demonstrate that the proposed action is safe in order to proceed. H.1(b). (Section 2RS1.1)

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

Summary of Plant Status

Clinton Power Station (CPS), Unit 1 was operated at or near full power during the inspection period with the following exceptions:

- On April 26, 2013, Control Room operators manually scrammed the reactor from full power following an unexpected electro-hydraulic control (EHC) system oil leak from a connection to one of the main turbine control valves. Following repairs, the unit was restarted on April 27th, synchronized to the grid on April 29th, and returned to full power April 30th.
- On May 19th, the licensee reduced power to about 75 percent to perform control rod sequence exchanges and main turbine control/stop/intermediate valve and main steam isolation valve (MSIV) testing. The unit was returned to full power later the same day.
- On May 21st, the licensee reduced power to about 75 percent to perform control rod sequence exchanges and repair a steam leak on a feed water heater drain valve. The unit was returned to full power the following day.

1. **REACTOR SAFETY**

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

.1 Readiness of Offsite and Alternate AC [Alternating Current] Power Systems

a. Inspection Scope

The inspectors evaluated the licensee's plant features and procedures for operation and continued availability of offsite and alternate AC power systems. The inspectors interviewed plant personnel and reviewed the licensee's communications protocols between the Transmission System Operator (TSO) and the plant to verify that the appropriate information was being exchanged when issues arose that could impact the offsite power system. Aspects considered in the inspectors' review included:

- The actions to be taken when notified by the TSO that the post-trip voltage of the offsite power system at the plant will not be acceptable to assure the continued operation of the safety-related loads without transferring to the onsite power supply;
- The compensatory actions identified to be performed if it is not possible to predict the post-trip voltage at the plant for the current grid conditions;
- The required re-assessment of plant risk based on maintenance activities that could affect grid reliability, or the ability of the transmission system to provide offsite power; and
- The required communications between the plant and the TSO when changes at the plant could impact the transmission system, or when the capability of the transmission system to provide adequate offsite power is challenged.

The inspectors performed a walkdown of the switchyard with a plant maintenance engineer to observe the material condition of the offsite power sources. The inspectors also reviewed the status of outstanding work orders to assess whether corrective actions for any degraded conditions were scheduled with the TSO with the appropriate priority.

This inspection constituted one offsite and alternate AC power systems readiness inspection sample as defined in Inspection Procedure (IP) 71111.01.

b. Findings

No findings of significance were identified.

.2 Readiness For Impending Hot Summer Weather Conditions

a. Inspection Scope

The inspectors evaluated the licensee's preparations for hot summer weather conditions, focusing on the electrical distribution system and the plant chilled water system. During the weeks of April 15th and April 22nd, the inspectors performed a detailed review of severe weather and plant de-winterization procedures and performed general area plant walkdowns. The inspectors focused on plant-specific design features and implementation of procedures for responding to or mitigating the effects of hot summer weather conditions on the operation of the plant. The inspectors reviewed system health reports and system engineering summer readiness review documents for the above systems.

Additionally, the inspectors verified that adverse weather related issues were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests (ARs) were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted one seasonal extreme weather readiness inspection sample as defined in IP 71111.01.

b. Findings

No findings of significance were identified.

.3 External Flooding

a. Inspection Scope

The inspectors reviewed flood protection barriers and procedures for coping with external flooding at the plant. Clinton Power Station has limited susceptibility to external flooding as described in Section 3.4.1.1 of the Updated Final Safety Analysis Report (UFSAR) and Section 5.2 of the Individual Plant Examination for External Events Report. The inspectors reviewed CPS 4303.02, "Abnormal Lake Level," Revision 12a, to assess the adequacy of the licensee response to external flooding conditions.

The inspectors conducted a walkdown of the Lake Screen House, including the shutdown service water pump rooms. The inspectors assessed the condition of water

tight door seals; the sealing of equipment floor plugs, electrical conduits, holes or penetrations in floors and walls between the pump rooms; and the condition of room floor drains, sumps, and sump pumps. In addition, the inspectors conducted a walkdown of the Clinton Lake Dam with the cognizant plant engineer to assess the condition of the dam and the readiness of materials staged to mitigate high water levels.

Additionally, the inspectors verified that external flooding protection issues were entered into the licensee's corrective action program with the appropriate characterization and significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted one external flooding readiness inspection sample as defined in IP 71111.01.

b. Findings

No findings of significance were identified.

.4 Readiness For Impending Adverse Weather Condition – Tornado/High Winds

a. Inspection Scope

Since thunderstorms with potential tornados and high winds were forecast in the vicinity of CPS for the week of April 22nd, the inspectors reviewed the licensee's overall preparations for the expected conditions. The inspectors toured the plant grounds in the vicinity of the main power transformers, unit auxiliary transformers, reserve auxiliary transformers, emergency reserve auxiliary transformer, and static volt-amp reactive compensators to look for loose debris, which if present could become missiles during a tornado or with high winds. During the inspection, the inspectors focused on plant-specific design features and the licensee's procedure used to respond to tornado and high winds conditions.

This inspection constituted one readiness for impending adverse weather condition inspection sample as defined in IP 71111.01.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment (71111.04)

.1 Quarterly Partial System Walkdowns (71111.04Q)

a. Inspection Scope

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

- Residual Heat Removal (RHR) Train A during planned maintenance on RHR Train B;

- Spent Fuel Pool Cooling (FC) Train B during planned maintenance on FC Train A; and
- Division 1 Diesel Generator (DG) during planned maintenance on Division 2 DG.

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

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

This inspection constituted three partial system walkdown inspection samples as defined in IP 71111.04.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Routine Resident Inspectors Tours (71111.05Q)

a. Inspection Scope

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

- Fire Zone T-1j, Steam Jet Air Ejector Room – Elevation 781'0"
- Fire Zone A-3e, Containment Electrical Penetration (West) Area – Elevation 762'0"
- Fire Zone T-1c, Condensate Pump Room – Elevation 709'0"
- Fire Zone F-1a, General Access Area – Elevation 712'0"
- Fire Zone D-4, Division 3 Diesel Generator Room – Elevation 737'0"; and
- Fire Zone R-1k, Clean and Dirty Oil Storage Room – Elevation 737'0"

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

In addition, the inspectors verified that fire protection related problems were entered into the licensee's corrective action program with the appropriate characterization and

significance. Selected action requests were reviewed to verify that corrective actions were appropriate and implemented as scheduled.

This inspection constituted six quarterly fire protection inspection samples as defined in IP 71111.05AQ.

b. Findings

No findings of significance were identified.

1R06 Flooding Protection Measures (71111.06)

.1 Internal Flooding

a. Inspection Scope

The inspectors reviewed selected risk important plant design features and licensee procedures intended to protect the plant and its safety-related equipment from internal flooding events. The inspectors reviewed flood analyses and design documents, including the UFSAR, engineering calculations, and abnormal operating procedures to identify licensee commitments. In addition, the inspectors reviewed licensee drawings to identify areas and equipment that may be affected by internal flooding caused by the failure or misalignment of nearby sources of water, such as the fire suppression or the service water systems. The inspectors also reviewed the licensee's corrective action documents with respect to past flood-related items identified in the corrective action program to verify the adequacy of the corrective actions. The inspectors performed a walkdown of the following plant areas to assess the adequacy of watertight doors and verify drains and sumps were clear of debris and were operable, and that the licensee complied with its commitments:

- Control and Diesel Generator Buildings – Elevation 702'0"

This inspection constituted one internal flooding inspection sample as defined in IP 71111.06.

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance (71111.07)

.1 Annual Heat Sink Performance (71111.07A)

a. Inspection Scope

The inspectors reviewed the licensee's examination of the RHR A heat exchanger. The inspectors assessed the as-found and as-left condition of the heat exchanger by direct observation and document reviews to verify that no deficiencies existed that would adversely impact the heat exchanger's ability to transfer heat to the shutdown service water system and to ensure that the licensee was adequately addressing problems that could affect the performance of the heat exchanger. The inspectors observed portions

of inspection and cleaning activities, eddy current tube examination activities, and reviewed documentation to verify that the inspection acceptance criteria specified in procedure ER-AA-340-1002, "Service Water Heat Exchanger and Component Inspection Guide," Revision 5 were satisfactorily met.

This inspection constituted one annual heat sink inspection sample as defined in IP 71111.07.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Regualification Program (71111.11)

.1 Resident Inspector Quarterly Review of Licensed Operator Regualification (71111.11Q)

a. Inspection Scope

The inspectors observed licensed operators during simulator training on May 15th. The inspectors assessed the operators' response to the simulated events focusing on alarm response, command and control of crew activities, communication practices, procedural adherence, and implementation of Emergency Plan requirements. The inspectors also observed the post-training critique to assess the ability of licensee evaluators and operating crews to self-identify performance deficiencies. The crew's performance in these areas was compared to pre-established operator action expectations and successful critical task completion requirements.

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

b. Findings

No findings of significance were identified.

.2 Resident Inspector Quarterly Observation of Heightened Activity or Risk (71111.11Q)

a. Inspection Scope

On May 19th, the inspectors observed licensed operators in the Control Room perform control rod sequence exchanges and main turbine control/stop/intermediate valve and MSIV testing. These activities required heightened awareness, additional detailed planning, and involved increased operational risk. 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 annunciators alarms;
- Correct use and implementation of procedures;
- Control panel manipulations;
- Oversight and direction from supervisors; and

- Ability to identify and implement appropriate TS actions.

This inspection constituted one quarterly licensed operator heightened activity/risk inspection sample as defined in IP 71111.11.

b. Findings

No findings of significance were identified.

.3 Annual Operating Test Results (71111.11A)

a. Inspection Scope

The inspectors reviewed the overall pass/fail results of the Annual Operating Test administered by the licensee from May 6th through June 7th, required by 10 CFR 55.59(a). The results were compared to the thresholds established in Inspection Manual Chapter (IMC) 0609, Appendix I, "Licensed Operator Requalification Significance Determination Process (SDP)," to assess the overall adequacy of the licensee's Licensed Operator Requalification Training (LORT) program to meet the requirements of 10 CFR 55.59. (02.02)

IP 71111.11, Section 02.02, "Biennial Written Examination Pass/Fail Results," was not performed during this inspection. This inspection did not constitute an inspection sample as defined in IP 71111.11.

b. Findings

No findings of significance were identified.

.4 Biennial Review (71111.11B)

a. Inspection Scope

The following inspection activities were conducted during the week of June 3rd, to assess: (1) the effectiveness and adequacy of the facility licensee's implementation and maintenance of its Systems Approach to Training (SAT) based LORT Program, put into effect to satisfy the requirements of 10 CFR 55.59; (2) conformance with the requirements of 10 CFR 55.46 for use of a plant-referenced simulator to conduct operator licensing examinations and for satisfying experience requirements; and (3) conformance with the operator license conditions specified in 10 CFR 55.53.

- Licensee Requalification Examinations (10 CFR 55.59(c); SAT Element 4 as Defined in 10 CFR 55.4): The inspectors reviewed the licensee's program for development and administration of the LORT biennial written examination and annual operating tests to assess the licensee's ability to develop and administer examinations that are acceptable for meeting the requirements of 10 CFR 55.59(a).
 - The inspectors conducted a detailed review of twelve Job Performance Measures (JPMs) and six dynamic simulator scenarios to assess content, level of difficulty, and quality of the operating test materials. (02.04)

- The inspectors observed the administration of the annual operating test to assess the licensee's effectiveness in conducting the examination(s), including the conduct of pre-examination briefings, evaluations of individual operator and crew performance, and post-examination analysis. The inspectors evaluated the performance of one crew 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. (02.05)
- The inspectors assessed the adequacy and effectiveness of the remedial training conducted since the last requalification examinations and the training planned for 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. (02.07)
- Conformance with Examination Security Requirements (10 CFR 55.49): The inspectors conducted an assessment of the licensee's processes related to examination physical security and integrity (e.g., predictability and bias) to verify compliance with 10 CFR 55.49, "Integrity of Examinations and Tests." The inspectors reviewed the facility licensee's examination security procedure, and observed the implementation of physical security controls (e.g., access restrictions and simulator input/output controls) and integrity measures (e.g., security agreements, sampling criteria, bank use, and test item repetition) throughout the inspection period. (02.06)
- Conformance with Operator License Conditions (10 CFR 55.53): 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. Additionally, medical records for twelve licensed operators were reviewed for compliance with 10 CFR 55.53(l). (02.08)
- Conformance with Simulator Requirements Specified in 10 CFR 55.46: The inspectors assessed the adequacy of the licensee's simulation facility (simulator) for use in operator licensing examinations and for satisfying experience requirements. The inspectors reviewed a sample of simulator performance test records (e.g., transient tests, malfunction tests, scenario based tests, post-event 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 corrective action process to ensure that simulator fidelity was being 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. (02.09)

- Problem Identification and Resolution (10 CFR 55.59(c); SAT Element 5 as Defined in 10 CFR 55.4): The inspectors assessed the licensee's ability to identify, evaluate, and resolve problems associated with licensed operator performance (a measure of the effectiveness of its LORT program and their ability to implement appropriate corrective actions to maintain its LORT Program up-to-date). The inspectors reviewed documents related to licensed operator performance issues (e.g., recent examination and inspection reports including Cited and Non-Cited Violations; NRC End-of-Cycle and Mid-Cycle reports; NRC Plant Issue Matrix; Licensee Event Reports (LERs); and corrective action program documents, including documentation of plant events and review of industry operating experience). The inspectors also sampled the licensee's quality assurance oversight activities, including licensee training department self-assessment reports. (02.10)

Inspection Procedure 71111.11, Section 02.03, "Biennial Requalification Written Examination Quality," was not performed during this inspection. This inspection did not constitute an inspection sample as defined in IP 71111.11.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

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

- AR 01444355, "Division 1 DG Main Control Room Handswitch Failed to Shutdown DG;"
- AR 01420045, "1PL12JA-86: Division 1 Lockout Relays Tripped Unexpectedly," and AR 01422698, "Unexpected Trip of Division 1 DG;" and
- AR 01496871, "5004-3H Self-Test System Failure Annunciator Received – Unexpected."

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

- Appropriate work practices;
- Identifying and addressing common cause failures;
- Scoping of SSCs in accordance with 10 CFR 50.65(b);
- Characterizing SSC reliability issues;
- Tracking SSC unavailability;
- Trending key parameters (condition monitoring);
- 10 CFR 50.65(a)(1) or (a)(2) classification and reclassification; and

- Appropriateness of performance criteria for SSC functions classified (a)(2) and/or appropriateness and adequacy of goals and corrective actions for SSC functions classified (a)(1).

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

This inspection constituted three maintenance effectiveness inspection samples as defined in IP 71111.12.

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

The inspectors reviewed the licensee's evaluation and management of plant risk for maintenance and emergent work activities affecting risk-significant and safety-related equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- Planned maintenance during the week of April 8-12 on Division 2 DG;
- Planned maintenance during the week of May 6-10 on RHR Train B;
- Planned maintenance during the week of June 10-14 on RHR Train C; and
- Emergent maintenance during the week of April 15-19 to troubleshoot Reactor Recirculation Pump B motor cooler leakage annunciator.

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

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

This inspection constituted four maintenance risk assessment inspection samples as defined in IP 71111.13.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following issues:

- AR 01436642, "Inadequate Deletion of Operations Requirements Manual Section 'Structural Integrity;'"
- AR 01489149, "1SX151C: Relief Valve Failed Allowable Range;"
- AR 01483304, "Mounting of Radiation Detectors Not Per Seismic Qualification;"
- AR 01511406, "1RIX-PR034; Off-Gas Pretreat Monitor Spiking;"
- AR 01458971, "1PL12JA; Division 1 DG Protective Relays Unsatisfactory As-found Testing;" and, AR 01500132, "1PL12JB-87; Relay 287-DG1B As-found Testing Unsatisfactory;" and
- EC 393439, "Past Operability Support for Average Power Range Monitor Flow Gain Adjustments."

The inspectors selected these potential operability/functionality issues based on the risk significance of the associated components and systems. The inspectors verified that the conditions did not render the associated equipment inoperable or result in an unrecognized increase in plant risk. When applicable, the inspectors verified that the licensee appropriately applied TS limitations, appropriately returned the affected equipment to an operable status, and reviewed the licensee's evaluation of the issue with respect to the regulatory reporting requirements. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluation. When applicable, the inspectors also verified that the licensee appropriately assessed the functionality of SSCs that perform specified functions described in the UFSAR, Operations Requirements Manual, Emergency Plan, Fire Protection Plan, regulatory commitments, or other elements of the current licensing basis when degraded or nonconforming conditions were identified.

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

This inspection constituted six operability evaluation inspection samples as defined in IP 71111.15.

b. Findings

No findings of significance were identified.

1R18 Plant Modifications (71111.18)

.1 Permanent Modifications

a. Inspection Scope

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

- EC 383491; "Remove Division 2 DG Over-Voltage Protection and Enhance 2301A Inputs,' Revision 0.

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

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

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

This inspection constituted one permanent modification inspection sample as defined in IP 71111.18.

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing (71111.19)

a. Inspection Scope

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

- Work Order (WO) 01510689-05, "Operations PMT [Post-Maintenance Test] Verify Proper Operation Main Control Room RCIC [Reactor Core Isolation Cooling] Flow Controller;"
- WO 01482047-02, "Operations PMT Run 1DG01KB Engine, Check for No Leakage;"
- WO 01600569-05, "Operations PMT Leak Check 1SX151C Relief Valve with Shutdown Service Water Pressure;" and
- WO 01608078-04, "Perform Post Maintenance Testing for Relays Installed in Control Room Ventilation B Chiller Control Panel."

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

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

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

b. Findings

No findings of significance were identified.

1R20 Refueling and Other Outage Activities (71111.20)

.1 Forced Outage C1F55

a. Inspection Scope

The inspectors evaluated outage activities during Unit 1 forced outage C1F55, which began on April 26th. Control Room operators manually scrammed the reactor from full power following an unexpected EHC oil leak from a connection to one of the main turbine control valves. After the unit was shut down, the licensee identified the oil leak was caused by a broken socket head cap screw used to attach a hydraulic shutoff valve to the turbine control valve with the three remaining cap screws loose. Following

repairs, the unit was restarted on April 27th, synchronized to the grid on April 28th, and reached full power on April 30th.

The inspectors reviewed and evaluated the conduct of outage activities to ensure that the licensee considered risk in developing, planning, and implementing the forced outage schedule. The inspectors observed or reviewed plant equipment configuration and risk management, electrical lineups, startup activities, and identification and resolution of problems associated with the outage.

This inspection constituted one "other outage" inspection sample as defined in IP 71111.20.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

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

- CPS 0954.02, "Reactor Core Isolation Cooling Valve Operability Checks," (Inservice Test);
- CPS 9432.63, "CRVICS [Containment and Reactor Vessel Isolation Control System] Containment Building Exhaust Duct Radiation 1RIX-PR042C Channel Calibration," (Routine Test);
- CPS 9015.01, "Standby Liquid Control Pump and Valve Operability," (Inservice Test); and
- CPS 9027.01C009, "Remote Shutdown Panel Operability – Division 2 Checklist," (Routine Test).

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

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

This inspection constituted two in-service tests and two routine surveillance tests for a total of four surveillance testing inspection samples as defined in IP 71111.22.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

.1 Emergency Preparedness Drill Observation

a. Inspection Scope

The inspectors evaluated the conduct of a full scale emergency preparedness drill on June 18th to identify any weaknesses and deficiencies in classification, notification, and protective action recommendation development activities. This drill was planned to be evaluated and was included in performance indicator data regarding drill and exercise performance. The inspectors observed emergency response operations in the Outage Control Center and Technical Support Center to determine whether the event classification, notifications, and protective action recommendations were performed in accordance with procedures. The inspectors also attended the licensee's drill critique to compare any inspector-observed weaknesses with those identified by the licensee's staff in order to evaluate the critique and to verify whether the licensee's staff was properly identifying weaknesses and entering them into the corrective action program.

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

b. Findings

No findings of significance were identified.

.2 Simulator Based Training Observation

a. Inspection Scope

The inspectors observed a simulator training evolution for the licensed operators on April 17th, which required Emergency Plan implementation by the operations crew. This evolution was planned to be evaluated and included in performance indicator data regarding drill and exercise performance. The inspectors observed event classification and notification activities performed by the operators. The inspectors also attended the post-evolution critique for the scenario. The focus of the inspectors' activities was to note any weaknesses and deficiencies in the crew's performance and to ensure that the licensee's evaluators noted the same issues and entered them into the corrective action program.

This inspection constituted one emergency preparedness simulator-based training inspection sample as defined in IP 71114.06.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

2RS1 Radiological Hazard Assessment and Exposure Controls (71124.01)

The inspection activities supplement those documented in NRC Inspection Report 05000461/2013002 and constitute a partial sample as defined in IP 71124.01.

.0 Radiological Hazard Assessment (02.02)

a. Inspection Scope

The inspectors selected the following radiologically risk-significant work activities that involved exposure to radiation:

- Radioactive Resin Cleanup Activities.

For these work activities, the inspectors assessed whether the pre-work surveys performed were appropriate to identify and quantify the radiological hazard and to establish adequate protective measures. The inspectors evaluated the Radiological Survey Program to determine if hazards were properly identified, including the following:

- The identification of hot particles;
- The presence of alpha emitters;
- The potential for airborne radioactive materials, including the potential presence of transuranic and/or other hard-to-detect radioactive materials, (This evaluation may include licensee planned entry into non-routinely entered areas subject to previous contamination from failed fuel.);
- The hazards associated with work activities that could suddenly and severely increase radiological conditions and that the licensee has established a means to inform workers of changes that could significantly impact their occupational dose; and
- Severe radiation field dose gradients that can result in non-uniform exposures of the body.

b. Findings

Introduction: A self-revealed finding of very low safety significance (Green) and associated Non-Cited Violation of TS 5.4.1.a for the failure to follow procedures resulted in the unplanned intake of radioactive material by five workers on March 28, 2013.

Description: On March 28, 2013, licensee personnel initiated work to clean up a legacy radioactive resin spill in the 720' Radwaste Pipe Tunnel. Radiation Work Permit (RWP) 10014553, "2013 RW HRA/LHRA," Revision 0, was established for the work evolution. Work commenced with the workers performing the work wearing respiratory protection equipment and using high efficiency particulate air (HEPA) vacuums as the clean-up method. Midway through the clean-up the workforce took a break. At this time, a decision was made by the Radiation Protection (RP) Supervision to eliminate the respiratory protection equipment. This decision was based on the result of an air sample taken during non-work (break) period. The work recommenced with the workforce using HEPA vacuums with no respiratory protection equipment. Nearing the end of the clean-up, the usage of the HEPA vacuums became less effective due to the increasing lengths

of hose installed on the vacuums. The RP Supervisor authorized the switch from HEPA vacuums to manual cleanup. The cleanup was completed by manually scooping up the resin and placement into containers.

Five workers received radiation monitor alarms when attempting to exit the Radiological Controlled Area or station portal monitors. These individuals were assayed for internal contamination using the station's whole body counter. The results showed positive for internal deposition of radioactive material. The station performed internal dose assessments in accordance with station procedures. All internal doses were determined to be less than 10 millirem.

Analysis: The licensee established the requirement to use a HEPA vacuum in the RWP and its related Micro-ALARA Plan. These documents did not specify nor allow the usage of a manual cleanup method. The licensee established but did not follow the requirements for resin cleanup. This is a performance deficiency which was within the licensee's ability to foresee and should have been prevented.

The performance deficiency was determined to be more than minor safety significance in accordance with Inspection IMC 0612, Appendix B, "Issue Screening," because it was associated with the program and process attribute of the Occupational Radiation Safety Cornerstone and affected the cornerstone objective of ensuring adequate protection of worker health and safety from exposure to radiation, in that, the workers received additional and unplanned dose from the intake of radioactive materials.

The significance was determined in accordance with IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process." The inspectors determined the finding has a very low safety significance (Green) because the finding did not involve: (1) ALARA planning or work controls involving excessive occupational collective dose, (2) an overexposure, (3) a substantial potential for overexposure, or (4) compromised ability to assess dose.

The primary cause of this finding was related to the cross-cutting aspect of human performance with the component of decision making. The licensee failed to use conservative assumptions in decision making and failed to adopt a requirement to demonstrate that the proposed action is safe in order to proceed in that licensee supervision did not ensure compliance with the approved RWP was maintained (H.1(b)).

Enforcement: TS 5.4.1.a requires, in part, that written procedures be established, implemented and maintained in accordance with Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Regulatory Guide 1.33, "Quality Assurance Program Requirements," Revision 2, Appendix A, Step 7(e) states the requirements for Radiation Protection procedures. Licensee procedure RP-AA-1008, "Unescorted Access, and Conduct in Radiologically Controlled Areas," Revision 3, established the requirement to follow the RWP. Contrary to the above, on March 28, 2013, the licensee failed to ensure that RWP 10014553, "2013 RW HRA/LHRA," Revision 0 was followed. This resulted in the unplanned intake of radioactive materials by five workers. Since the violation of TS 5.4.1.a was of very low safety significance and was entered into the licensee's corrective action program (AR 01494203) this violation is being treated as a Non-Cited Violation, consistent with Section 2.3.2 of the NRC Enforcement Policy **(NCV 05000461/2013003-01, Failure to Follow Procedures Resulted in the Unplanned Intake of Radioactive Material by Five Workers).**

2RS8 Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation (71124.08)

This inspection constituted one complete sample as defined in IP 71124.08.

.0 Inspection Planning (02.01)

a. Inspection Scope

The inspectors reviewed the solid radioactive waste system description in the UFSAR, the Process Control Program, and the recent Radiological Effluent Release Report for information on the types, amounts, and processing of radioactive waste disposed.

The inspectors reviewed the scope of any quality assurance audits in this area since the last inspection to gain insights into the licensee's performance and inform the "smart sampling" inspection planning.

b. Findings

No findings of significance were identified.

.1 Radioactive Material Storage (02.02)

a. Inspection Scope

The inspectors selected areas where containers of radioactive waste are stored, and evaluated whether the containers were labeled in accordance with 10 CFR 20.1904, "Labeling Containers," or controlled in accordance with 10 CFR 20.1905, "Exemptions to Labeling Requirements," as appropriate.

The inspectors assessed whether the radioactive material storage areas were controlled and posted in accordance with the requirements of 10 CFR Part 20, "Standards for Protection against Radiation." For materials stored or used in the controlled or unrestricted areas, the inspectors evaluated whether they were secured against unauthorized removal and controlled in accordance with 10 CFR 20.1801, "Security of Stored Material," and 10 CFR 20.1802, "Control of Material Not in Storage," as appropriate.

The inspectors evaluated whether the licensee established a process for monitoring the impact of long term storage (e.g., buildup of any gases produced by waste decomposition, chemical reactions, container deformation, loss of container integrity, or re-release of free-flowing water) that was sufficient to identify potential unmonitored, unplanned releases or nonconformance with waste disposal requirements.

The inspectors selected containers of stored radioactive material, and assessed for signs of swelling, leakage, and deformation.

b. Findings

No findings of significance were identified.

.2 Radioactive Waste System Walkdown (02.03)

a. Inspection Scope

The inspectors walked down accessible portions of select radioactive waste processing systems to assess whether the current system configuration and operation agreed with the descriptions in the UFSAR, Offsite Dose Calculation Manual, and process control program.

The inspectors reviewed administrative and/or physical controls (i.e., drainage and isolation of the system from other systems) to assess whether the equipment which is not in service or abandoned in place would not contribute to an unmonitored release path and/or affect operating systems or be a source of unnecessary personnel exposure. The inspectors assessed whether the licensee reviewed the safety significance of systems and equipment abandoned in place in accordance with 10 CFR 50.59, "Changes, Tests, and Experiments".

The inspectors reviewed the adequacy of changes made to the radioactive waste processing systems since the last inspection. The inspectors evaluated whether changes from what is described in the UFSAR were reviewed and documented in accordance with 10 CFR 50.59, as appropriate, and assessed the impact on radiation doses to members of the public.

The inspectors selected processes for transferring radioactive waste resin and/or sludge discharges into shipping/disposal containers and assessed whether the waste stream mixing, sampling procedures, and methodology for waste concentration averaging were consistent with the process control program, and provided representative samples of the waste product for the purposes of waste classification as described in 10 CFR 61.55, "Waste Classification."

For those systems that provide tank recirculation, the inspectors evaluated whether the tank recirculation procedures provided sufficient mixing.

The inspectors assessed whether the licensee's Process Control Program correctly described the current methods and procedures for dewatering and waste stabilization (e.g., removal of freestanding liquid).

b. Findings

No findings of significance were identified.

.3 Waste Characterization and Classification (02.04)

a. Inspection Scope

The inspectors selected the following radioactive waste streams for review:

- Concentrated Waste:
- Waste Sludge; and
- Spent Resin.

For the waste streams listed above, the inspectors assessed whether the licensee's radiochemical sample analysis results (i.e., "10 CFR Part 61" analysis) were sufficient to support radioactive waste characterization as required by 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste." The inspectors evaluated whether the licensee's use of scaling factors and calculations to account for difficult-to-measure radionuclides was technically sound and based on current 10 CFR Part 61 analyses for the selected radioactive waste streams.

The inspectors evaluated whether changes to plant operational parameters were taken into account to: (1) maintain the validity of the waste stream composition data between the annual or biennial sample analysis update; and (2) assure that waste shipments continued to meet the requirements of 10 CFR Part 61 for the waste streams selected above.

The inspectors evaluated whether the licensee had established and maintained an adequate Quality Assurance Program to ensure compliance with the waste classification and characterization requirements of 10 CFR 61.55 and 10 CFR 61.56, "Waste Characteristics."

b. Findings

No findings of significance were identified.

.4 Shipment Preparation (02.05)

a. Inspection Scope

The inspectors observed shipment packaging, surveying, labeling, marking, placarding, vehicle checks, emergency instructions, disposal manifest, shipping papers provided to the driver, and licensee verification of shipment readiness. The inspectors assessed whether the requirements of applicable transport cask certificate of compliance had been met. The inspectors evaluated whether the receiving licensee was authorized to receive the shipment packages. The inspectors evaluated whether the licensee's procedures for cask loading and closure procedures were consistent with the vendor's current approved procedures.

The inspectors assessed whether the shippers were knowledgeable of the shipping regulations and whether shipping personnel demonstrated adequate skills to accomplish the package preparation requirements for public transport with respect to:

- The licensee's response to NRC Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," dated August 10, 1979; and
- Title 49 CFR Part 172, "Hazardous Materials Table, Special Provisions, Hazardous Materials Communication, Emergency Response Information, Training Requirements, and Security Plans," Subpart H, "Training."

Due to limited opportunities for direct observation, the inspectors reviewed the technical instructions presented to workers during routine training. The inspectors assessed whether the licensee's training program provided training to personnel responsible for the conduct of radioactive waste processing and radioactive material shipment preparation activities.

b. Findings

No findings of significance were identified.

.5 Shipping Records (02.06)

a. Inspection Scope

The inspectors evaluated whether the shipping documents indicated the proper shipper name; emergency response information and a 24-hour contact telephone number; accurate curie content and volume of material; and appropriate waste classification, transport index, and UN number for the following radioactive shipments:

- Radioactive Material Shipment M12-018; Outage Equipment; February 24, 2012;
- Radioactive Waste Shipment W12-016; Spent Resin; October 11, 2012;
- Radioactive Waste Shipment W12-017; Dry Active Waste; October 30, 2012;
- Radioactive Waste Shipment W12-019; Fuel Pool Demineralizer Resin; December 27, 2012; and
- Radioactive Waste Shipment W13-003; Spent Resin; March 24, 2013.

Additionally, the inspectors assessed whether the shipment placarding was consistent with the information in the shipping documentation.

b. Findings

No findings of significance were identified.

.6 Identification and Resolution of Problems (02.07)

a. Inspection Scope

The inspectors assessed whether problems associated with radioactive waste processing, handling, storage, and transportation, were being identified by the licensee at an appropriate threshold, were properly characterized, and were properly addressed for resolution in the licensee corrective action program. Additionally, the inspectors evaluated whether the corrective actions were appropriate for a selected sample of problems documented by the licensee that involve radioactive waste processing, handling, storage, and transportation.

The inspectors reviewed results of selected audits performed since the last inspection of this program and evaluated the adequacy of the licensee's corrective actions for issues identified during those audits.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Review of Submitted Quarterly Data

a. Inspection Scope

The inspectors performed a review of the data submitted by the licensee for the First Quarter 2013 Performance Indicators for any obvious inconsistencies prior to its public release in accordance with IMC 0608, "Performance Indicator Program."

This inspection was not considered to be an inspection sample as defined in IP 71151.

b. Findings

No findings of significance were identified.

.2 Mitigating Systems Performance Index (MSPI) - Cooling Water Systems

a. Inspection Scope

The inspectors reviewed a sample of plant records and data against the reported MSPI - Cooling Water Systems Performance Indicator. To determine the accuracy of the performance indicator data reported, performance indicator definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the MSPI derivation reports, Control Room logs, Maintenance Rule database, LERs, and maintenance and test data from July 2012 through March 2013, to validate the accuracy of the performance indicator data reported. 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 corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this performance indicator.

This inspection constituted one MSPI - Cooling Water System Performance Indicator verification inspection sample as defined in IP 71151.

b. Findings

No findings of significance were identified.

.3 Mitigating Systems Performance Index - Emergency AC Power System

a. Inspection Scope

The inspectors reviewed a sample of plant records and data against the reported MSPI - Emergency AC Power System Performance Indicator. To determine the accuracy of the performance indicator data reported, performance indicator definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the MSPI derivation reports, Control

Room logs, Maintenance Rule database, LERs, and maintenance and test data from April 2012 through March 2013, to validate the accuracy of the performance indicator data reported. 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 corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this performance indicator.

This inspection constituted one MSPI - Emergency AC Power System Performance Indicator verification inspection sample as defined in IP 71151.

b. Findings

No findings of significance were identified.

.4 Mitigating Systems Performance Index - High Pressure Injection Systems

a. Inspection Scope

The inspectors reviewed a sample of plant records and data against the reported MSPI - High Pressure Injection Systems Performance Indicator. To determine the accuracy of the performance indicator data reported, performance indicator definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the MSPI derivation reports, Control Room logs, Maintenance Rule database, LERs, and maintenance and test data from July 2012 through March 2013, to validate the accuracy of the performance indicator data reported. 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 corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this performance indicator.

This inspection constituted one MSPI - High Pressure Injection System Performance Indicator verification injection sample as defined in IP 71151.

b. Findings

No findings of significance were identified.

.5 Mitigating Systems Performance Index - Heat Removal System

a. Inspection Scope

The inspectors reviewed a sample of plant records and data against the reported MSPI - Heat Removal System Performance Indicator. To determine the accuracy of the performance indicator data reported, performance indicator definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the MSPI derivation reports, Control Room logs, Maintenance Rule database, LERs, and maintenance and test data from

July 2012 through March 2013, to validate the accuracy of the performance indicator data reported. 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 corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this performance indicator.

This inspection constitutes one MSPI Heat Removal System Performance Indicator verification inspection sample as defined in IP 71151.

b. Findings

No findings of significance were identified.

.6 Mitigating Systems Performance Index - RHR System

a. Inspection Scope

The inspectors reviewed a sample of plant records and data against the reported MSPI - RHR System Performance Indicator. To determine the accuracy of the performance indicator data reported, performance indicator definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the MSPI derivation reports, Control Room logs, Maintenance Rule database, LERs, and maintenance and test data from July 2012 through March 2013, to validate the accuracy of the performance indicator data reported. 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 corrective action program database to determine if any problems had been identified with the performance indicator data collected or transmitted for this performance indicator.

This inspection constitutes one MSPI - RHR System Performance Indicator verification inspection sample as defined in IP 71151.

b. Findings

No findings of significance were identified.

40A2 Identification and Resolution of Problems (71152)

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that they were being entered into the licensee's corrective action program at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. Some minor issues were entered into the

licensee's corrective action program as a result of the inspectors' observations; however, they are not discussed in this report.

This inspection was not considered to be an inspection sample as defined in IP 71152.

b. Findings

No findings of significance were identified.

.2 Annual In-Depth Review Sample

a. Inspection Scope

The inspectors selected the following action request for in-depth review:

- AR 01510208; "Multiple Troubles at 1PA06J, First Hit [Ground Monitoring] Panel."

The inspectors verified the following attributes during their review of the licensee's corrective actions for the above action request and other related action requests:

- Complete and accurate identification of the problem in a timely manner commensurate with its safety significance and ease of discovery;
- Consideration of the extent of condition, generic implications, common cause and previous occurrences;
- Evaluation and disposition of operability/reportability issues;
- Classification and prioritization of the resolution of the problem, commensurate with safety significance;
- Identification of the root and contributing causes of the problem; and
- Identification of corrective actions, which were appropriately focused to correct the problem.

The inspectors discussed the corrective actions and associated action request evaluations with licensee personnel.

This inspection constituted one annual in-depth review sample as defined in IP 71152.

b. Findings and Observations

No findings of significance were identified.

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

.1 Reactor Scram Response

a. Inspection Scope

On April 26th, Unit 1 was manually scrammed from full power following an unexpected EHC system oil leak from a connection to one of the main turbine control valves. The inspectors responded to the Control Room to verify that post-scram plant parameters were as expected. The inspectors also reviewed plant procedures, equipment

configurations, and Control Room logs. The inspectors verified that operator response was in accordance with plant procedures and that plant equipment responded as designed.

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

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 Failure to Submit a Timely UFSAR Revision

By letter dated January 10, 2013, the licensee submitted Revision 15 of the UFSAR for Clinton Power Station, Unit 1 to the NRC. In accordance with 10 CFR 50.71, "Maintenance of records, making reports," Paragraph (e); licensees are required to periodically submit updates to the UFSAR. Specifically, 10 CFR 50.71(e)(4) states, in part: "Subsequent revisions must be filed annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months."

Upon review, the NRC staff found that the licensee did not submit Revision 15 of the UFSAR within the timeframe required by 10 CFR 50.71(e)(4). The last refueling outage at Clinton Power Station was completed on December 23, 2011, and Revision 14 of the UFSAR was submitted on January 10, 2011. Therefore, Revision 15 of the UFSAR was submitted 24 months (i.e., more than a year) after the last revision and more than 6 months after the last refueling outage. There was no approved exemption to the 6-month requirement for Clinton Power Station.

By letter dated April, 11, 2013, the NRC staff informed the licensee that its submittal of Revision 15 to the UFSAR did not meet the 10 CFR 50.71(e)(4) timeliness requirement (ADAMS Accession No. ML13099A426). The licensee's failure to provide a timely update to the UFSAR constitutes a violation of minor safety significance that is not subject to enforcement action in accordance with the NRC's Enforcement Policy. The inspectors concluded that this violation was of minor safety significance because it did not screen as more-than-minor using the screening questions in IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Screening." The violation did not involve a failure to submit the required update to the UFSAR, but was simply a late submittal that had no adverse consequence. The licensee entered this violation into its corrective action program as AR 01502067.

.2 (Closed) Unresolved Item (URI) 05000461/2012002-03, "Incomplete ED [Electronic Dosimeter] Dose Rate Alarm Evaluation"

The URI described a condition where additional information was needed by the inspectors to assess the licensee's response to ED dose rate alarms caused by glove contamination. The inspectors previously reviewed this issue and documented a Non-Cited Violation of 10 CFR 20.1501(a) in NRC Inspection Report 05000461/2013002 for the licensee's failure to perform surveys to ensure compliance with 10 CFR 20.1201

shallow-dose equivalent limits for five workers during the fourth quarter of 2011 due to contamination build-up on the workers' gloves. This URI is closed.

4OA6 Management Meetings

.1 Resident Inspectors' Exit Meeting

The inspectors presented the inspection results to Mr. B. Taber and other members of the licensee's staff at the conclusion of the inspection on July 2, 2013. The licensee acknowledged the findings presented. Proprietary information was examined during this inspection, but is not specifically discussed in this report.

.2 Interim Exit Meetings

Interim exit meetings were conducted for:

- The Review of the Licensed Operator Requalification Program with Mr. B. Taber and other members of the licensee's staff on June 7, 2013. The inspectors confirmed that none of the potential report input discussed was considered proprietary.
- The Radiological Hazard Assessment and Exposure Controls; Radioactive Solid Waste Processing; Radioactive Material Handling, Storage, and Transportation Inspection with Mr. B. Taber and other members of the licensee's staff on June 14, 2013. The licensee acknowledged the findings presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

G. Armstrong, Security Manager
R. Bair, Shift Operations Superintendent
K. Baker, Regulatory Assurance Manager
R. Bedford, Licensed Operator Requalification Lead Training Instructor
R. Campbell, RP Technical Manager
J. Cunningham, Operations Director
A. Darelus, Emergency Preparedness
C. Dunn, Training Director
R. Frantz, Regulatory Assurance
M. Friedman, Radiation Protection Operations Manager
N. Hightower, Radiation Protection Manager
K. Leffel, Operations Support Manager
D. Kemper, Engineering Director
S. Kowalski, Senior Manager Design Engineering
S. Mohundro, Engineering Programs Manager
J. Mulvey, ODCM Program Owner
W. Noll, Site Vice President
S. O'Riley, Emergency Preparedness
J. Peterson, Regulatory Assurance
C. Rocha, Nuclear Oversight Manager
R. Schenck, Work Management Director
D. Shelton, Operations Services Manager
D. Smith, Design Engineering
J. Smith, Senior Manager Plant Engineering
D. Snook, Operations Training Manager
T. Stoner, Maintenance Director
J. Stovall, Chemistry, Environmental & Radwaste Manager
D. Szymkiewicz, Clinton Buried Piping Program Owner
B. Taber, Plant Manager
J. Ufert, Fire Marshall
R. Zacholski, Nuclear Oversight Lead Assessor

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened

05000461/2013003-01	NCV	Failure to Follow Procedures Resulted in the Unplanned Intake of Radioactive Material by Five Workers. (Section 2RS1.1)
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Closed

05000461/2013003-01	NCV	Failure to Follow Procedures Resulted in the Unplanned Intake of Radioactive Material by Five Workers. (Section 2RS1.1)
05000461/2012002-03	URI	Incomplete ED Dose Rate Alarm Evaluation. (Section 4OA5.2)

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections of 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

- WC-AA-107, "Seasonal Readiness," Revision 10
- OP-AA-108-107, "Switchyard Control," Revision 11
- OP-AA-102-104, Att. 2 "Unit 1 Standing Order, "Controlling Grounds in Switchyards," Revision 2
- OP-CL-108-107-1002, "Degraded Grid Actions," Revision 2
- CPS 4302.01, "Tornado/High Winds," Revision 19a
- CPS 4303.02, "Abnormal Lake Level," Revision 12a
- CPS 4304.01, "Flooding," Revision 6
- AR 01417449, "Clinton 2013 Site Summer Readiness Actions"
- AR 01424793, "SY system Exceeds Maintenance Rule Reliability Criteria"
- AR 01434412, "Incorporate Lessons Learned from Summer 2012 into WO Procedure"
- AR 01450202, "Walkdown of Transformers and Switchyard"
- AR 01501773, "Spring/Severe Weather Preparation"
- AR 01502389, "Entered 4302.01 Tornado/High Winds Off-Normal"
- AR 01503065, "Pre-Emptive Schedule Changes For Severe Weather"
- AR 01503947, "Unable To Determine Lake Level For Entry Into 4302.02"
- AR 01503970, "Entry Into Abnormal Lake Level CPS 4302.02"

1R04 Equipment Alignment

- CPS 3312.01E001, "Residual Heat Removal Electrical Lineup," Revision 17
- CPS 3312.01V001, "Residual Heat Removal Valve Lineup," Revision 17a
- CPS 3312.01V002, "Residual Heat Removal Instrument Valve Lineup," Revision 9a
- CPS 3317.01E001, "Fuel Pool Cooling and Cleanup Electrical Lineup," Revision 13
- CPS 3317.01V001, "Fuel Pool Cooling and Cleanup Valve Lineup," Revision 12
- CPS 3317.01V002, "Fuel Pool Cooling and Cleanup Instrument Valve Lineup," Revision 7
- CPS 3506.01E01, "Diesel Generator and Support Systems Electrical Lineup," Revision 18b
- CPS 3506.01C01, "Diesel Generator 1A Pre-Start Checklist," Revision 14a
- CPS 3506.01V01, "Diesel Generator and Support Systems Valve Lineup," Revision 13A
- CPS 3506.01V02, "Diesel Generator and Support Systems Instrument Valve Lineup," Revision 11b
- M05-1035, "Diesel Generator Auxiliary System (DG) Starting Air Exhaust & Combustion System," Revision AE
- M05-1036, "P&ID Diesel Generator Fuel Oil System (DO)," Revision S
- AR 01529225, "Procedure Change Request for CPS 3317.01V001"

1R05 Fire Protection

- CPS 1893.04M510, "737 Diesel Generator: Division 3 Diesel Generator & Day Tank Room Prefire Plan," Revision 6a
- CPS 1893.04M400, "712' Fuel: Basement Prefire Plan," Revision 5

- CPS 1893.04M624, "737' Radwaste: Clean and Dirty Oil Storage Tank Room Prefire Plan," Revision 4
- CPS 1893.04M702, "709' Turbine: Condensate Pump Room Prefire Plan," Revision 6
- AR 01397017, "EOID: Alarm Bell on 1FP02JC Does Not Work"
- Clinton Power Station Updated Final Safety Analysis Report, Appendix E, "Fire Protection Evaluation Report – Clinton Power Station Unit 1," Revision 15
- Clinton Power Station Updated Final Safety Analysis Report, Appendix F, "Fire Protection Safe Shutdown Analysis – Clinton Power Station Unit 1," Revision 15
- OP-AA-201-009, "Control of Transient Combustible Material," Revision 11

1R06 Flooding Protection Measures

- CPS Individual Plant Examination (IPE), Section 3.3.8, "Internal Flood Analysis," September 1992
- CPS-PSA-012, "Clinton PRA 2003 Update Internal Flooding Update: Integration of the Internal Flooding Analysis into the Single-Top Model," Revision 0
- Clinton Power Station Updated Safety Analysis Report, Revision 15
- NRC Information Notice 2009-006, "Construction-Related Experiences with Flood Protection Features," July 21, 2009
- SL-4576, "Internal Flooding – Safe Shutdown Analysis and INPO SOER No. 85-5 Comparison Evaluation Report" (Sargent & Lundy), January 31, 1990
- A29-1000-01A, "Diesel Generator Building Basement Plan – Area 1," Revision M
- A29-1000-02A, "Diesel Generator Building Basement Plan – Area 2," Revision J
- A29-1000-03A, "Diesel Generator Building Basement Plan – Area 3," Revision U
- A29-1000-04A, "Diesel Generator Building Basement Plan – Area 4," Revision D
- A29-1000-05A, "Diesel Generator Building Basement Plan – Area 5," Revision E
- A29-1000-06A, "Diesel Generator Building Basement Plan – Area 6," Revision D
- A30-1000-01A, "Control Building Basement Floor Plan – Area 1," Revision K
- A30-1000-02A, "Control Building Basement Floor Plan – Area 2," Revision P
- A30-1000-03A, "Control Building Basement Floor Plan – Area 3," Revision J
- A30-1000-04A, "Control Building Basement Floor Plan – Area 4," Revision N
- A30-1000-05A, "Control Building Basement Floor Plan – Area 5," Revision B
- A30-1000-06A, "Control Building Basement Floor Plan – Area 6," Revision N
- AR 01373446, "NRC Identified Potential Issue With Radwaste Tank Room Floor Drains"
- AR 01463514, "712' Fuel Building Floor Drain Clogged Due to 1WS066B Leak"
- AR 01462981, "Excessive Water Build Up on Floor of Turbine Building and Fuel Building"
- AR 01366703, "New Watertight Door Seal Not Vulcanized Completely at Joints"
- AR 01354149, "Main Control Room Annunciator 5013-8E High-High Level Floor/Equipment Drain Sump"

1R07 Heat Sink Performance

- ER-AA-340, "GL 89-13 Program Implementing Procedure," Revision 6
- ER-AA-340-1001, "GL 89-13 Program Implementation Instructional Guide," Revision 8
- ER-AA-340-1002, "Service Water Heat Exchanger Inspection Guide," Revision 5
- WO 0069109319, "Perform 1E12B001A Heat Exchanger Inspection"
- AR 01480163, "RHR A HX Inspection – Missed Water Sample During Draining"

1R11 Licensed Operator Regualification Program

- OP-AA-105-102, "Attachment 2, Reactivation of License Log (7 Examples), Multiple Dates"

- TQ-AA-155-F05, "Simulator Evaluation Form – CREW, January 23, 2013"
- Accelerated Requalification Plan (One Example), Revision 1 & 2, June 6, 2012
- TQ-AA-155-F04, "Simulator Evaluation Form - Individual (Multiple Examples), Multiple Dates"
- OP-AA-102-106, "Operator Response Time Program," Revision 1
- OP-CL-102-106-1001, "Operator Response Time Program at CPS," Revision 1
- TQ-AA-155-F02, "Simulator Evaluation Form - Shift Manager," October 24, 2012
- OP-CL-108-101-1003-F-01, "Pre-Shift Briefing Agenda, Revision 6
- OP-CL-108-101-1003, "Operations Department Standards and Expectations," Revision 29
- Nuclear Fuels Transmittal of Design Information, July 28, 2011
- TQ-AA-306-F-06, "BWR Critical Conditions for Cold Startup," April 29, 2012
- TQ-AA-306-F-07, "BWR Coefficient of Reactivity and Control Rod Worth," April 29, 2007
- TODI # NF1100235, "BWR Xenon Worth (Page 8 of 20)," April 29, 2012
- TODI # NF1100235, "BOC Initial Conditions (Page 9 of 20)," April 29, 2012
- TQ-AA-306-F-09, "BWR Site Specific Shutdown Margin and Reactivity Anomaly Tests," Revision 2, April 29, 2012
- CPS 9811.01D001, "Shutdown Margin Data Sheet," February 2, 2012
- CPS 9812.01C001, "Reactivity Anomaly Checklist," February 2, 2012
- One Hour Drift Test and Data, May 8, 2012
- Simulator Stability Test and Data (100% BOC), February 2, 2012
- Simulator Stability Test and Data (100% PHE), February 2, 2012
- Simulator Stability Test and Data (100% EOR), February 2, 2012
- Operator Response Time Validations, No Date
- Simulator Stability 100% EOR, 12-Hour Run, February 2, 2012
- Steady State Performance 50% Power, May 8, 2012
- Steady State Performance 75% Power, May 8, 2012
- Steady State Performance 100% Power, May 18, 2012
- TQ-AA-306-F-20, "Simulator Scenario Based Testing Checklist and Scenarios; Multiple," Various Dates
- Simulator Performance Verification Guide 5.01; Manual Scram; 05/18/2012
- Simulator Performance Verification Guide 5.02, Simultaneous Trip of All Feedwater Pumps, May 18, 2012
- Simulator Performance Verification Guide 5.03, Simultaneous Closure of All MSIVs, May 18, 2012
- Simulator Performance Verification Guide 5.04, Simultaneous Trip of All Reactor Recirc Pumps, May 8, 2012
- Simulator Performance Verification Guide 5.05, Single Recirculation Pump Trip ('A' Pump), May 8, 2012
- Simulator Performance Verification Guide 5.05, Single Recirculation Pump Trip ('B' Pump), May 18, 2012
- Simulator Performance Verification Guide 5.06, Main Turbine Trip (At Max PWR Without an Immediate Scram), May 18, 2012
- Simulator Performance Verification Guide 5.07, Max Rate Power Ramp Down to Approximately 75% Then Back Up To 100%, May 8, 2012
- Simulator Performance Verification Guide 5.08, Max Size RCS Rupture Combined with LOOP, May 8, 2012
- Simulator Performance Verification Guide 5.09, Maximum Size Unisolable Main Steam Line Rupture, May 8, 2012
- Simulator Performance Verification Guide 5.10, Simultaneous Closure of all MSIVs Combined with a Single Stuck Open SRV, May 8, 2012
- LER 2011-001-00, Postulated Spurious High Pressure Core Spray Initiation Result Unanalyzed, April 6, 2011

- LER 2011-004-00, Automatic Reactor Scram During Removal of Main Generator, January 12, 2012
- Clinton Station Open Simulator Work Requests, Multiple; Various Dates
- Clinton Station Closed Simulator Work Requests, Multiple, Various Dates
- Medical Records for 12 Licensed Operators
- 2013 Annual Operating Test, 2 Dynamic Simulator Scenarios, Week 4
- 2013 Annual Operating Test, 6 JPMs, Week 5
- 2013 Annual Operating Test, 2 Dynamic Simulator Scenarios, Week 5
- Annual Operating Test, 6 JPMs, Week 6
- 2013 Annual Operating Test, 2 Dynamic Simulator Scenarios, Week 6
- AR 1252446 EAL Classification DEP Adverse Trend, September 15, 2011
- AR 1285638 Exercise Objective Failure in MCR/Simulator, November 28, 2011
- AR 1300701 Clearance and Tagging Error Causes Removal of Shared Tags, January 4, 2012
- AR 1304323 RPV Level 3 Actuation, December 18, 2011
- AR 1335348 Decline in Reactivity Management Performance Indicator, March 27, 2012
- AR 1425533, Inadvertent Transfer of Freon, CRHVAC Chiller B, November 12, 2006
- AR 1428316 Recirculation HPU Filter Valve Discovered Out of Position, March 9, 2013
- AR 1449447 Simulator Response to Loss of VP Chiller, December 7, 2012
- AR 1510573 Enhancement to License Maintenance, May 6, 2013
- RCR: Automatic Scram on High Pressure During Approach to Unit Shutdown, December 13, 2011
- RCR: RPV Level 3 Scram Signal Actuation During C1R13, January 17, 2012
- RCR: Manual Scram Due to Loss of EHC Fluid, May 24, 2013
- SWR 13635 VP Flow and Heat Exchange, May 11, 2012
- Various JPMs Weeks 5 and 6
- Various Scenario Exercise Guidelines Weeks 4, 5, and 6
- TQ-AA-150, Operator Training Programs, Revision 8
- TQ-AA-155, Conduct of Simulator Training and Evaluation, Revision 1

1R12 Maintenance Effectiveness

- Clinton Power Station Updated Safety Analysis Report, Revision 15
- Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2
- NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2
- ER-AA-310, "Implementation of Maintenance Rule," Revision 8
- ER-AA-310-1001, "Maintenance Rule Scoping," Revision 4
- ER-AA-310-1004, "Maintenance Rule – Dispositioning Between (a)(1 and (a)(2)," Revision 6
- Equipment Apparent Cause Evaluation AR 01420045, "1PL12JA-86; Division 1 Lockout Relays Tripped Unexpectedly"
- Equipment Apparent Cause Evaluation AR 01444355, "Division 1 Diesel Generator (DG) Main Control Room Handswitch Failed to Shutdown DG"
- NRC Information Notice 92-04, "Potter 7 Brumfield Model MDR Rotary Relay Failures," January 6, 1992
- Engineering Change Request 407698, "Division 1 Diesel Generator K-19 Relay Troubleshooting Performed"
- Engineering Change (EC) 393567, "Relay 287-DG1B (RL789) Out of Tolerance Evaluation," Revision 0
- Engineering Change Request 406952, "Common Cause Failure Evaluation – Division 1 Diesel Generator Lockout Relay Actuation Failure 10/5/12," Revision 0

- Prompt Investigation 1420045, "Div 1 Lockout relays Tripped Unexpectedly"
- Prompt Investigation 1422698, "Unexpected Trip of Division 1 Diesel Generator"
- Power Labs Report, Letter dated January 16, 2013, Project Number CPS-32954, "Failure Analysis of a Generator Differential Protective Relay"
- Power Labs Report, Letter dated January 25, 2013, Project Number CPS-32954, "Failure Analysis of a Generator Differential Protective Relay"
- Work Order (WO) 1226446-01, "Replace k19 Relay With New Pre-tested Relay"
- Work Order (WO) 1426778-02, "Perform PMT for relay/switches identified as requiring PMT per Task 01, job step 26 and 27"
- AR 01444355, "Division 1 Diesel Generator (DG) Main Control Room Handswitch Failed to Shutdown DG"
- AR 01121419, "1DG01KA, 1PL12JA-A10/A11 Div 1 DG Overvoltage Breaker Tripped"
- AR 01306753, "Performed 9030.05 on Division 1, Received Two Failures"
- AR 01340240, "Maintenance Rule CDE Extension Not Documented"
- AR 01346041, "Received Unexpected MCR Annunciator 5004-3H STS Failure"
- AR 01341883, "Problem Identification & Resolution Outside Procedure and Process"
- AR 01386851, "STS System Failure, Multiple MCR Annunciators"
- AR 01408258, "Self-Test System Failed and Will Not Reset"
- AR 01419127, "EIOD Division 1 DG Lockout Relays Failed to Trip on Overcrank"
- AR 01420045, "1PL12JA-86; Division 1 Lockout Relays Tripped Unexpectedly"
- AR 01420344, "1PL12JA-86; Engineering Change Request 406682 Division 1 DG 86 Lockout Relay"
- AR 01420615, "STS Power Supplies Cycled Due to STS Failure"
- AR 01420831, "STS Power Supplies Cycled"
- AR 01421111, "Division 1 Self-Test UIO Card Failed During 9030.05"
- AR 01422698, "Unexpected Trip of Division 1 DG"
- AR 01423225, "Relay 74-DG1KA Causing Slow Reset for Annunciator 5060-1D"
- AR 01425744, "4.0 Style Critique of DG Lockout Troubleshooting"
- AR 01429280, "Received Division 2 Safety Associated ATM Trouble"
- AR 01433080, "Received Unexpected MCR Annunciator 5004-3H STS Failure"
- AR 01438389, "Received Unexpected MCR Annunciator 5004-3H STS Failure"
- AR 01438510, "Unexpected MCR Annunciator 5004-3H STS Failure"
- AR 01439012, "Unexpected Alarm. Received 5004-3H: STS Failure"
- AR 01439651, "Received MCR Annunciator 5004-3H STS Failure"
- AR 01474484, "Diesel Generator System (a)(2) At Risk"
- AR 01496871, "5004-3H STS Failure Annunciator Received – Unexpected"
- AR 01500132, "Relay 287-DG1B As Found Testing Unsatisfactory"
- AR 01506717, "Challenge Status of Division 2 DG Trouble Shooting Scope"
- AR 01518713, "MCR Received 5004-3H STS Failure"
- AR 01521869, "1B21N678D: RPS D4 ATM Cal or GR Fail Status Light Not Lit"

1R13 Maintenance Risk Assessments and Emergent Work Control

- ER-AA-600, "Risk Management," Revision 6
- ER-AA-600-1012, "Risk Management Documentation," Revision 9
- ER-AA-600-1014, "Risk Management Configuration Control," Revision 6
- ER-AA-600-1042, "On-Line Risk Management," Revision 7
- WC-AA-101, "On-Line Work Control Process," Revision 19
- WC-AA-104, "Integrated Risk Management," Revision 18
- Adverse Condition Monitoring Plan RR-1304-0001, "'B' Reactor Recirculation Motor Winding Cooler Leakage"

- AR 01493963, "Received Unexpected Annunciator 5067-4H Inboard MSIV LCS Inoperable"
- AR 01494045, "EH Pump 'A' Delayed Response During Weekly Jog"
- AR 01498344, "Unexpected Annunciator 5003-4K, Recirc Motor Winding Cooler Leakage"
- AR 01495268, "EOID: Rectifier 'D' Glycol Cooling Leak Getting Worse"
- AR 01495874, "System Manager ID: EH Pump 'A' Discharge Pressure Relief Transient During Post-Maintenance Test"
- AR 01523765, "Entered 4301.01 for Seismic Event Triggered"
- AR 01523797, "AR/PR PT 15001 and 15005 Primary Met Tower Unsat As-Left"
- AR 01523840, "1WS01PA Upper Motor Oil Cloudy and Leaking"
- AR 01523859, "4.0 Critique for 1WS01PA"
- AR 01523973, "Met Tower 0UIX-PR050 and 1UR-EM015 Indications Failed Low"
- AR 01525423, "Received Annunciator 5009-3A, Activated Seismic Recorder"

1R15 Operability Evaluations

- AR 01483304, "Mounting of Rad Detectors not Per Seismic Qualification"
- EC 393310, Seismic Past Operability Evaluation for Rad Detectors 1RE-PR008A, B, C, D (AR 01483304), Revision 0
- EC 381842, "Move Detectors 1REPR008B and D to Opposite Side of Plenum," Revision 0
- ECN 27338, "Add drawing addition sheet...", April 30, 1992
- Vendor manual E070-000020, "1B-4X-HT-CC," September 1981
- NRC Regulatory Issue Summary 2005-20, "Revision to NRC Inspection Manual Part 9900 Technical Guidance, 'Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety,'" Revision 1
- NUREG 1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Revision 2
- OP-AA-108-115, Operability Determinations (CM-1), Revision 11
- AR 01458971, "1PL12JA: DIV 1 Diesel Generator Protective Relays Unsat as-found Testing;"
- EC 408397, "Perform as-Found Testing of 1PL12JA, Division 1 Diesel Generator Protective Relays
- AR 01500132, "1PL12JB-87; Relay 287-DG1B as found Testing Unsat
- EC 393567, "Relay 287-DG1B (RL 789) Out of Tolerance Evaluation
- AR 1499715, "Received AR/PR High Alarm on 1RIX-PR034 Off Gas Pre-treat"
- AR 1510299, "1RIX-PR034 High Alarm Spikes"
- AR 1510338, "1RIX-PR034; OG Pretreat Monitor; Spiked to 41.4 uCi/cc"
- AR 1511039, "1RIXPR034 – Pretreat Off Gas Rad Monitor"
- AR 1511406, "1RIX-PR034; OG Pretreat Monitor Spiking"
- AR 1517660, "NRC Question Rad Detectors Mounting Not Per Seismic Qual"
- WO 1632127, "Received AR/PR High Alarm on 1RIX-PR034 Off Gas Pre-treat"
- WO 1640920, "1RIX-PR034; OG Pretreat Monitor Spiking"
- M05-1064, "P&ID Process Radiation Monitoring System," Revision M
- M05-1084, "P&ID Off Gas (OG)," Revision AF
- EC 358352, "Evaluate AR/PR Alert Setpoint Exceeded Without Alarm," Revision 0
- CPS 3315.03, "Radiation Monitoring (AR-PR)," Revision 9
- NSED Review 30819, Eberline IB-4AHTCC, Revision 0
- Clinton Power Station Technical Specifications
- Clinton Power Station Updated Final Safety Analysis Report, Revision 15
- NRC Regulatory Issue Summary 2005-20, "Revision to NRC Inspection Manual Part 9900 Technical Guidance, 'Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety,'" Revision 1
- NUREG 1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Revision 2
- CL-2007-S-022, "Relocate Requirements From ORM 2.1.2 to USAR 4.6.3.1.1.5" Revision 0

- UFSAR Change 2007-012, "Relocate Channel Functional Testing for Control Rod Scram Accumulator Level Detectors and Channel Calibration of Pressure Detectors"
- CL-2003-E-149, "Installation of Auxiliary Platform 1F15-E005, EC 346264 and Associated Procedure and UFSAR Changes," Revision 0
- CL-2006-S-022, "Remove Various Shutdown Actions in ORM," Revision 0
- EC 393439, "Past Operability Support for APRM Flow Gain Adjustments," Revision 0
- EC 393314, "Discussion of APRM B flow Gain Adjustment Procedure Error," Revision 0
- AR 01487398, "APRM Flow Gains As Found Out of Tolerance on A, B, D"
- AR 01489668, "1H13P671: APRM C Flow Gain Adjustment Was Required"
- AR 01484516, "APRM C Flow Gain As Found Out of Tolerance"
- AR 01436642, "Inadequate Deletion of ORM Section 'Structural Integrity'"
- AR 01420789, "OPEX – Clinton ORM 2.3.3 Change Similar to LaSalle TRM Change"
- AR 01444543, "Clarify Technical Specification Bases for Division 1/2 DG 14 Day LCO"

1R18 Plant Modifications

- EC 383491, "Remove Division 2 Diesel Generator Overvoltage Protection and Enhance 2301A Inputs," Revision 0

1R19 Post-Maintenance Testing

- MA-AA-716-012, "Post-Maintenance Testing," Revision 11
- Apparent Cause Evaluation #1337989, "1RIXPR035 Detector Failure – Entry Into 4004.02 Loss of Vacuum," Revision 0
- Engineering Change 393220, "Evaluate Past Operability of 1SX151C Relief Valve Test Failure," Revision 0
- CPS 8207.07, "Emergency Diesel Engine Two (2) Year Maintenance and Inspection," Revision 2
- CPS 9054.05, "RCIC RSP Operability Checks," Revision 33
- CPS 9054.01C001, "RCIC Water Leg Pump (1E51-C003) Operability Test 1E51-F040 Closure Test and 1SX037 Stroke Timing," Revision 9
- CPS 9054.01C002, "RCIC (1E51-C001) High Pressure Operability Checks," Revision 7
- CPS 9054.01D001, "RCIC Water Leg Pump (1E51-C003) Operability Test 1E51-F040 Closure Test and 1SX037 Stroke Timing Datasheet," Revision 48
- CPS 9054.01D002, "RCIC (1E51-C001) High Pressure Operability Checks Checklist," Revision 25
- CPS 9437.61, "Post Treatment Off Gas System Process Radiation Monitor 1RIX-PR035, (1RIX-PR041) Calibration Test," Revision 47b
- CPS 9437.61D001, "Post Treatment Off Gas System Process Radiation Monitor 1RIX-PR035, (1RIX-PR041) Calibration Data Sheet," Revision 36c
- WO 01608078-04, "Perform Post Maintenance Testing for Relays installed in VC "B" Chiller control Panel under task 01"
- WO 01442140, "1E51-F010 RCIC Suction From RCIC Storage Tank Valve Operator," April 4, 2013
- WO 01482047, "Operations PMT Run 1DG01KB, Check for no leakage," April 11, 2013
- WO 01483480, "1DG01KB – Perform Airbox Inspections," April 10, 2013
- WO 01510689, "Operations PMT Verify Proper Operation MCR RCIC Flow Controller," April 4, 2013
- WO 01536441, "1RIXPR035: Troubleshoot and Repair Monitor Lock Up," February 22, 2013
- WO 01600589, "Operations PMT Leak Check 1SX151C Relief Valve with SX Pressure," April 8, 2013

- E03-0VC13CB, "HVAC System (VC) control Panel chiller Skid," Sht. 001 & 003
- AR 01359165, "Create WO Tasks for EACE CAs on Radiation Monitors"
- AR 01443786, "1SX151C Lifted When 'B' SX Pump Auto Started"
- AR 01489149, "1SX151C Relief Valve Failed Allowable Range"
- AR 01497347, "RCIC Oil Filter D/P High During 9054.01C002 RCIC PMT Run"
- AR 01497552, "1E51C002: EOID Small Oil Leak Off Fitting on RCIC Governor"
- AR 01497466, "9054.01C002 Revision Needed For Controller S.P. at 620"
- AR 01498793, "RHR C AHU Drain Clogged, 1SX151C Lifted During 9027.01C009"
- AR 01500316, "During Maintenance PMT, 3 Fuel Leaks Were Discovered"
- AR 01501802, "0VC13CB Wiring Discrepancy Noted"
- AR 01502697, "NRC Question on 1SX151C Relief Valve"
- AR 01503309, "MCR Received Alarm 5004-3F SPDS CSF Alarm on EOP-9 Entry"
- AR 01506022, "1RIXPR035 Flow Rate Below Desired Band"

1R20 Refueling and Other Outage Activities

- Material Safety Data Sheet, "Fyrquel EHC," ICL Industrial Product ID #7052, Revision 4 January 4, 2012

1R22 Surveillance Testing

- RP-CL-500-103, "Drum and Hose Control," Revision 1
- CPS 9015.01, "Standby Liquid Control system Operability," Revision 41
- CPS 9015.01D001, "Standby Liquid Control Pump and Valve Data Sheet," Revision 38a
- ER-AA-310, "Implementation of the Maintenance rule," Revision 8
- AR 01510734, "EOID: PCRA 9015.01 Standby Liquid Control Operability"
- AR 01510735, "EOID: 1CF41F001A Handwheel Spun When Valve Operated"
- Clinton Power Station Technical Specifications
- Clinton Power Station Updated Final Safety Analysis Report, Revision 15
- Clinton Nuclear Power Station Unit 1, "Inservice Testing Program Plan – Third Ten Year Interval," Revision 3
- American Society of Mechanical Engineers / American National Standards Institute (ASME/ANSI) Code for Operation and Maintenance of Nuclear Power Plants (OM), 2004 Edition
- NUREG 1482, "Guidelines for Inservice Testing at Nuclear Power Plants," Revision 1
- Clinton Nuclear Station Check Valve Condition Monitoring Plan Group CMP-06, RCIC Turbine Exhaust Vacuum Breakers, Revision 0
- Clinton Nuclear Station Check Valve Condition Monitoring Plan Group 13, RCIC Waterleg Pump Discharge Swing Check Valve, Revision 0
- Clinton Nuclear Station Check Valve Condition Monitoring Plan Group 14, RCIC Waterleg Pump Discharge Stop Check Valve, Revision 0
- IST-CPS-BDOC-V-24, "Reactor Core Isolation Cooling," Revision 15
- EC 385398, "Acceptance Criteria for Comprehensive Pump Test Procedures," Revision 0
- CPS 9027.01C009, "RSP Operability – Division 2 Checklist," Revision 6c
- CPS 9052.04, "LPCS/RHR A Discharge Header Filled and Flow Path Verification," Revision 28b
- CPS 9432.63, "CRVICS Containment Building CCP Exhaust Duct Radiation 1RIX-PR042A (B,C,D) Channel Calibration," Revision 39b
- CPS 9054.02, "Reactor Core Isolation Cooling Valve Operability Checks," Revision 41a
- CPS 9054.02D001, "RCIC Valve Operability Data Sheet," Revision 41
- AR 00759486, "NRC GL 2008 – Fabricate Clear Flex Vent Hoses"

- AR 01195401, "NRC GL 2008-01 Inspection Findings at Byron/Braidwood"
- AR 01173402, "NRC GL 2008-01 FASA Evaluation Adding Time Duration to Venting Act"
- AR 01501318, "1RH117A; Recommendation to Enhance CPS 9080.22 and 9053.01"
- AR 01518200, "1RH03BA Air Found While Performing 9052.04 on RHR 'A'/LPCS"
- AR 01519378, "Air Void Monitoring Results at Location RHB-7 Line 1RH117A2"
- AR 01529609, "Air Was Observed During 9052.04 (RHR A to Fuel Pool)"

1EP6 Drill Evaluation

- AR 1526763, "2013 CPS PI Drill OSC Facility Demonstration Criteria H.3.3"
- EP-AA-113-F-22, "Clinton Assembly, Accountability and Evacuation Guidelines," Revision A

2RS1 Radiological Hazard Assessment and Exposure Controls

- AR0149420, "Employees Unable to Pass Exit Portal Monitors," March 28, 2013
- Internal Dose Assessments, March 28, 2013
- RWP 10014553, 2013 RW HRA/LHRA, Revision 0

2RS8 Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation

- Clinton Power Station Updated Final Safety Analysis Report, Chapter 11, Revision 15
- Audit Plan, "Chemistry, Radwaste, Effluent and Environmental Monitoring," May 17, 2012
- Training Qualification Records, Various Records
- CPS 3909.01, "Operating Spent Resin System," Revision 23c
- CY-CL-6502-03, "Mobile Unit Solidification Isolok Sampling System," Revision 0
- RW-AA-100, "Process Control Program for Radioactive Wastes," Revision 8
- RP-AA-376, "Radiological Postings, Labeling and Markings," Revision 6
- RP-AA-376-1001, "Radiological Posting, Labeling and Marking Standard," Revision 7
- RP-AA-600, "Radioactive Material/Waste Shipments," Revision 12
- RP-AA-600-1001, "Exclusive Use and Emergency Response Information," Revision 8
- RP-AA-600-1004, "Radioactive Waste Shipments to Energy Solutions Clive Utah Disposal Site Containerized Waste Facility," Revision 11
- RP-AA-600-1005, "Radioactive Material and Non Disposal Waste Shipments," Revision 15
- RP-AA-601, "Surveying Radioactive Material Shipments," Revision 14
- RP-AA-602, "Packaging of Radioactive Material Shipments," Revision 18
- RP-AA-602-1001, "Packaging of Radioactive Material/Waste Shipments," Revision 14
- RP-AA-603, "Inspection and Loading of Radioactive Material Shipments," Revision 8
- RP-AA-603-1001, "Inspection and Loading of Radioactive Material/Waste Shipments," Revision 2
- RP-AA-605, 10 CFR Part 61 Program, Revision 5
- Radioactive Material Shipment M12-018, Outage Equipment, February 24, 2012
- Radioactive Waste Shipment W12-016, Spent Resin, October 11, 2012
- Radioactive Waste Shipment W12-017, Dry Active Waste, October 30, 2012
- Radioactive Waste Shipment W12-019, Fuel Pool Demineralizer Resin, December 27, 2012
- Radioactive Waste Shipment W13-003, Spent Resin, March 24, 2013
- FASA NRC Inspection 77124.08 Radioactive Solid Waste Processing and Radioactive Material Handling, Storage and Transportation, March 1, 2013
- AR 01489433, RP Shipping Qualification Cards not Ready, March 19, 2013
- AR 01496534, Weight Discrepancy on Spent Resin Cask, dated, April 2, 2013
- AR 01523794, Table 11.4-5 of USAR Not Reflective of Supporting Documents, June 11, 2013

- AR 01524735, Enhancement to RP-AA-605, 10 CFR Part 61 Program, June 13, 2013

40A1 Performance Indicator Verification

- Nuclear Energy Institute 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6
- ER-AA-310-1004, Attachment 8 Failure Classification Form, AR 1420045 "Division 1 Lockout Relays Tripped Unexpectedly"
- ER-AA-310-1004, Attachment 8 Failure Classification Form, AR 1422698 "Unexpected Trip of Division 1 DG"
- MSPI Failure Determination Evaluation #1214578
- MSPI Failure Determination Evaluation #1297512
- AR 01297509, "1DG01KA: Division 1 DG Tripped Following Start"
- AR 01297512, "1DG01KA16: Division 1 DG Failed to Start"
- AR 01509197, "NRC SSFF PI In Exelon Action Region"
- AR 01519380, "MSPI EDGS Meet Newly Issued Early Warning Criteria ER-AA-2008"

40A2 Identification and Resolution of Problems

- Operational Decision Maker #1381045, "Determine When Troubleshooting Should Be Done To Isolate Ground on EHC System," Revision 0
- Operational Decision Maker #1510208, "Determine When to Troubleshoot and Repair +24 VDC Ground," Revision 0
- Adverse Condition Monitoring Plan AC-EH-1305-0001, "+24 VDC Ground at 1PA06J During Turbine Online Testing"
- AR 01510208, "Multiple Troubles at 1PA06J, First Hit Panel"
- AR 01510274, "1PA06J; 5007-1C Unexpected Alarm"
- AR 01510616, "System Manager ID: Anomaly In EH Operating Panel Indications"
- AR 01520477, "Received MCR Annunciator 5007 – 1C Trouble EHC System"

40A5 Other Activities

- Letter from J. Bowen, USNRC, to M. Pacilio, Exelon Generation Company, Subject: "Clinton Power Station, Unit No. 1, Revision 15, of the Updated Final Safety Analysis Report," April 11, 2013
- Apparent Cause Evaluation AR 01502067, "Untimely USAR Update," Revision 0
- AR 01502067, "Untimely USAR Update"

LIST OF ACRONYMS USED

AC	Alternating Current
ADAMS	Agency-wide Documents and Management System
ALARA	As Low As Reasonably Achievable
APRM	Average Power Range Monitor
AR	Action Request
CFR	Code of Federal Regulations
CPS	Clinton Power Station
CRVICS	Containment and Reactor Vessel Isolation Control System
DG	Diesel Generator
ECR	Engineering Change Request
ED	Electronic Dosimeter
EHC	Electro-hydraulic Control
FC	Fuel Pool Cooling
HEPA	High Efficiency Particulate Air
IMC	Inspection Manual Chapter
IP	Inspection Procedure
JPM	Job Performance Measure
LER	Licensee Event Report
LORT	Licensed Operator Requalification Training
MSIV	Main Steam Isolation Valve
MSPI	Mitigating Systems Performance Index
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NRC	U.S. Nuclear Regulatory Commission
OG	Off Gas
PARS	Publicly Available Records
PMT	Post-Maintenance Test
RCIC	Reactor Core Isolation Cooling
RHR	Residual Heat Removal
RP	Radiation Protection
RWP	Radiation Work Permit
SAT	Systems Approach to Training
SDP	Significance Determination Process
SSCs	Structures, Systems, and Components
TS	Technical Specification
TSO	Transmission System Operator
UFSAR	Updated Final Safety Analysis Report
URI	Unresolved Item
WO	Work Order

M. Pacilio

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Sincerely,

/RA/

Christine A. Lipa, Branch Chief
Branch 1
Division of Reactor Projects

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