



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

August 6, 2013

Mr. Peter Dietrich
Senior Vice President and
Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

**SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION – NRC INTEGRATED
INSPECTION REPORT 05000361/2013003 and 05000362/2013003**

Dear Mr. Dietrich:

On June 23, 2013, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your San Onofre Nuclear Generating Station, Units 2 and 3, facility. The enclosed inspection report documents the inspection results which were discussed on June 27, 2013, with Mr. D. Bauder, Vice President, and other members of your staff.

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

An NRC identified finding of very low safety significance (Green) was identified during this inspection. The finding did not involve a violation of NRC requirements.

If you contest this finding, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the San Onofre Nuclear Generating Station.

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 IV; and the NRC Resident Inspector at the San Onofre Nuclear Generating Station.

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

P. Dietrich

- 2 -

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/

Ryan E. Lantz, Chief
SONGS Project Branch
Office of the Regional Administrator

Dockets: 50-361, 50-362
Licenses: NPF-10, NPF-15

Enclosure:
NRC Inspection Report 05000361/2013003
and 05000362/2013003
w/attachment: Supplemental Information

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R:_ REACTORS\ SONGS\2013\SO IR 13-03 ADAMS ML

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 50-361, 50-362

License: NPF-10, NPF-15

Report: 05000361/2013003 and 05000362/2013003

Licensee: Southern California Edison (SCE)

Facility: San Onofre Nuclear Generating Station, Units 2 and 3

Location: 5000 S. Pacific Coast Hwy
San Clemente, CA

Dates: March 24 through June 23, 2013

Inspectors: C. Hale, Reactor Inspector
J. Laughlin, Emergency Preparedness Inspector, NSIR
J. Reynoso, Resident Inspector
N. Taylor, Senior Project Engineer
G. Warnick, Senior Resident Inspector
M. Williams, Reactor Inspector

Approved By: Ryan E. Lantz, Chief
SONGS Project Branch
Office of the Regional Administrator

Enclosure

SUMMARY OF FINDINGS

IR 05000361/2013003, 05000362/2013003; 03/24/2013 – 06/23/2013; San Onofre Nuclear Generating Station, Units 2 and 3, Integrated Resident and Regional Report; Internal Flooding, Other Activities.

The report covered a 3-month period of inspection by resident inspectors and region-based inspectors. One Green finding of significance was identified. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609, "Significance Determination Process." The cross-cutting aspect is determined using Inspection Manual Chapter 0310, "Components Within the Cross-Cutting Areas." Findings for which the significance determination process does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified Findings and Self-Revealing Findings

Cornerstone: Mitigating Systems

- Green. The inspectors identified one finding of very low safety significance for the licensee's failure to follow procedures regarding the Fukushima event response for flood protection to comply with NRC endorsed NEI 12-07, "Guidelines for Performing Walkdowns of Plant Flood Protection Features." Specifically, the licensee failed to evaluate the conduits beneath the grating of the diesel generator building for inclusion in the walkdown scope and failed to establish adequate procedures that included accurate assessment of the Available Physical Margin of flooding protection features included in the flooding walkdown scope. This finding was entered into the licensee's corrective action program as Nuclear Notifications NN 202369978 and NN 202375161.

The performance deficiency is greater than minor, and therefore a finding, because it is associated with the Mitigating Systems Cornerstone attribute of Protection Against External Factors (Flood Hazard) and it adversely affects the associated cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors determined that the finding could be evaluated using the significance determination process in accordance with IMC 0609, "Significance Determination Process," and conducted a Phase 1 characterization and initial screening. Phase 1 initial screening determined that IMC 0609 Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," should be used. Because the finding did not involve the loss or degradation of equipment or function specifically designed to mitigate a seismic, flooding, or severe weather initiating event (e.g., seismic snubbers, flooding barriers, tornado doors), the finding screened as Green. The finding has a cross-cutting aspect in the area of human performance, associated with the decision-making component, because the licensee did not verify the validity of the underlying assumptions and identify possible unintended consequences [H.1(b)] (Section 40A5).

REPORT DETAILS

Summary of Plant Status

Unit 2 began the inspection period shut down for Refueling Outage R2C17 and remained shut down for the duration of the inspection period.

Unit 3 began the inspection period shut down for Forced Outage F3C16 and remained shut down for the duration of the inspection period.

On June 12, 2013, SCE notified the NRC that it had permanently ceased power operation of the San Onofre Nuclear Generating Station, Units 2 and 3, effective June 7, 2013.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

Readiness for Impending Adverse Weather Conditions

a. Inspection Scope

Since moderate rain and high winds were forecast in the vicinity of the facility for May 5-6, 2013, the inspectors reviewed the plant personnel's overall preparations/protection for the expected weather conditions. On May 5, 2013, the inspectors walked down the Units 2 and 3 turbine buildings and east access roads near the switchyard systems because their safety-related functions could be affected, or required, as a result of high winds or tornado-generated missiles or the loss of offsite power. The inspectors evaluated the plant staff's preparations against the site's procedures and determined that the staff's actions were adequate. During the inspection, the inspectors focused on plant-specific design features and the licensee's procedures used to respond to specified adverse weather conditions. The inspectors also toured the plant grounds to look for any loose debris that could become missiles during a tornado. The inspectors evaluated operator staffing and accessibility of controls and indications for those systems required to control the plant. Additionally, the inspectors reviewed the Updated Final Safety Analysis Report (UFSAR) and performance requirements for the systems selected for inspection and verified that operator actions were appropriate as specified by plant-specific procedures. The inspectors also reviewed a sample of corrective action program items to verify that the licensee-identified adverse weather issues at an appropriate threshold and dispositioned them through the corrective action program in accordance with station corrective action procedures. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one sample of readiness for impending adverse weather conditions, as defined in Inspection Procedure 71111.01-05.

b. Findings

No findings were identified.

1R04 Equipment Alignment (71111.04)

.1 Partial Walkdown

a. Inspection Scope

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

- April 5, 2013, Unit 2, saltwater cooling system
- May 15, 2013, Unit 2, Train A emergency diesel generator
- June 14, 2013, Unit 2, spent fuel pool cooling system

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

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

b. Findings

No findings were identified.

.2 Complete Walkdown

a. Inspection Scope

On May 30-31, 2013, the inspectors performed a complete system alignment inspection of the Unit 2, Train A saltwater cooling system to verify the functional capability of the system. The inspectors selected this system based on risk-informed insights from site-

specific risk studies together with other factors, such as engineering analysis and judgment, operating experience, performance history, current plant mode, and/or previous walkdowns. The inspectors inspected the system to review mechanical and electrical equipment line ups, electrical power availability, system pressure and temperature indications, as appropriate, component labeling, component lubrication, component and equipment cooling, hangers and supports, operability of support systems, and to ensure that ancillary equipment or debris did not interfere with equipment operation. The inspectors reviewed a sample of past and outstanding work orders to determine whether any deficiencies significantly affected the system function. In addition, the inspectors reviewed the corrective action program database to ensure that system equipment-alignment problems were being identified and appropriately resolved. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one complete system walkdown sample, as defined in Inspection Procedure 71111.04-05.

b. Findings

No findings were identified.

1R05 Fire Protection (71111.05AQ)

.1 Quarterly Fire Inspection Tours

a. Inspection Scope

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

- May 6, 2013, Units 2 and 3, auxiliary control building, 30 foot and 39 foot 2 inch elevations
- May 15, 2013, Units 2 and 3, auxiliary control building, 50 foot elevation
- May 23, 2013, Units 2 and 3, auxiliary control and turbine building, 70 foot elevation
- May 30 ,2013, Units 2 and 3, saltwater pipe tunnel, saltwater cooling pump room, and saltwater intake area

The inspectors reviewed areas to assess whether licensee personnel had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant; effectively maintained fire detection and suppression capability; maintained passive fire protection features in good material condition; and had implemented adequate compensatory measures for out of service, degraded or inoperable fire protection equipment, systems, or features, in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall

contribution to internal fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to affect equipment that could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the attachment, the inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use; fire detectors and sprinklers were unobstructed; transient material loading was within the analyzed limits; and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's corrective action program. Specific documents reviewed during this inspection are listed in the attachment.

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

b. Findings

No findings were identified.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

The inspectors reviewed the UFSAR, the flooding analysis, and plant procedures to assess susceptibilities involving internal flooding; reviewed the corrective action program to determine if licensee personnel identified and corrected flooding problems; inspected underground bunkers/manholes to verify the adequacy of sump pumps, level alarm circuits, cable splices subject to submergence, and drainage for bunkers/manholes; and verified that operator actions for coping with flooding can reasonably achieve the desired outcomes. The inspectors also inspected the areas listed below to verify the adequacy of equipment seals located below the flood line, floor and wall penetration seals, watertight door seals, common drain lines and sumps, sump pumps, level alarms, and control circuits, and temporary or removable flood barriers. Specific documents reviewed during this inspection are listed in the attachment.

- March 21 and 22, 2013, Units 2 and 3, emergency diesel generator buildings

These activities constitute completion of one flood protection measures inspection sample, as defined in Inspection Procedure 71111.06-05.

b. Findings

No findings were identified.

1R11 Licensed Operator Requalification Program and Licensed Operator Performance (71111.11)

.1 Quarterly Review of Licensed Operator Requalification Program

a. Inspection Scope

On June 4, 2013, the inspectors observed a crew of licensed operators in the plant's simulator during requalification training specific to abnormal and emergency station procedures. The inspectors assessed the following areas:

- Licensed operator performance
- The ability of the licensee to administer the evaluations and the quality of the training provided
- Modeling and performance of the control room simulator
- Quality of post-scenario critiques
- Follow-up actions taken by the licensee for identified discrepancies

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

b. Findings

No findings were identified.

.2 Quarterly Observation of Licensed Operator Performance

a. Inspection Scope

On May 8, 2013, the inspectors observed the performance of on-shift licensed operators in the plant's main control room associated with Unit 2. At the time of the observations, the plant was in a period of heightened supervisory and oversight activity due to reactivity manipulations of control element assemblies. The inspectors observed the operators' performance of the pre-job briefing notes of the control room staff, including procedure changes associated with control element assembly testing. The testing was part of maintenance activities to troubleshoot and repair components associated with the control element assemblies.

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

b. Findings

No findings were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

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

- April 8, 2012, Unit 3, refueling water storage tank external coating condition inspection
- April 25, 2013, Units 2 and 3, review of instrument air goal setting evaluation

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

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

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

These activities constitute completion of two maintenance effectiveness samples, as defined in Inspection Procedure 71111.12-05.

b. Findings

No findings were identified.

1R18 Plant Modifications (71111.18)

.1 Temporary Modifications

a. Inspection Scope

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

- April 29 through May 1, 2013, Unit 2, temporary scaffolding in support of control room modification

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

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

b. Findings

No findings were identified.

.2 Permanent Modifications

a. Inspection Scope

The inspectors reviewed key affected parameters associated with energy needs, materials, replacement components, timing, heat removal, control signals, equipment protection from hazards, operations, flow paths, pressure boundary, ventilation boundary, structural, process medium properties, licensing basis, and failure modes for the permanent modifications listed below.

- April 29 through May 1, 2013, Unit 2, control room lighting and acoustic panel permanent modifications

The inspectors reviewed key parameters associated with energy needs, materials, replacement components, timing, heat removal, control signals, equipment protection from hazards, operations, flow paths, pressure boundary, ventilation boundary,

structural, process medium properties, licensing basis, and failure modes for the permanent modification identified as control room lighting and acoustic panel permanent modifications.

The inspectors verified that modification preparation, staging, and implementation did not impair emergency/abnormal operating procedure actions, key safety functions, or operator response to loss of key safety functions; postmodification testing will maintain the plant in a safe configuration during testing by verifying that unintended system interactions will not occur; systems, structures and components' performance characteristics still meet the design basis; the modification design assumptions were appropriate; the modification test acceptance criteria will be met; and licensee personnel identified and implemented appropriate corrective actions associated with permanent plant modifications. Specific documents reviewed during this inspection are listed in the attachment.

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

b. Findings

No findings were identified.

1R19 Post-Maintenance Testing (71111.19)

a. Inspection Scope

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

- April 19, 2013, Unit 2, Train B emergency diesel generator building emergency supply Fan MA276 replacement and post maintenance testing
- April 19, 2013, Unit 2, Train B emergency diesel generator jacket water pump coupling

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

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

The inspectors evaluated the activities against the technical specifications, the UFSAR, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications to ensure that the test results adequately ensured that the equipment

met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with post-maintenance tests to determine whether the licensee was identifying problems and entering them into the corrective action program and that the problems were being corrected commensurate with their importance to safety. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two post-maintenance testing inspection samples, as defined in Inspection Procedure 71111.19-05.

b. Findings

No findings were identified.

1R20 Refueling and Other Outage Activities (71111.20)

.1 Refueling Outage

a. Inspection Scope

The inspectors reviewed the outage safety plan and contingency plans for the Unit 2 refueling outage R2C17, which started January 9, 2012, to confirm that licensee personnel had appropriately considered risk, industry experience, and previous site-specific problems in developing and implementing a plan that assured maintenance of defense in depth. During the refueling outage, the inspectors observed portions of the shutdown and cooldown processes and monitored licensee controls over the outage activities listed below.

- Configuration management, including maintenance of defense in depth, commensurate with the outage safety plan for key safety functions and compliance with the applicable technical specifications when taking equipment out of service
- Clearance activities, including confirmation that tags were properly hung and equipment appropriately configured to safely support the work or testing
- Installation and configuration of reactor coolant pressure, level, and temperature instruments to provide accurate indication, accounting for instrument error
- Status and configuration of electrical systems to ensure that technical specifications and outage safety-plan requirements were met; and controls over switchyard activities
- Monitoring of decay heat removal processes, systems, and components
- Verification that outage work did not impact the ability of the operators to operate the spent fuel pool cooling system

- Reactor water inventory controls, including flow paths, configurations, and alternative means for inventory addition; and controls to prevent inventory loss
- Controls over activities that could affect reactivity
- Maintenance of secondary containment as required by the technical specifications
- Refueling activities, including fuel handling and sipping to detect fuel assembly leakage
- Startup and ascension to full power operation, tracking of startup prerequisites, walkdown of the drywell (primary containment) to verify that debris had not been left which could block emergency core cooling system suction strainers, and reactor physics testing
- Licensee identification and resolution of problems related to refueling outage activities

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

Refueling Outage R2C17 was still in progress at the end of this inspection period. Consequently, these activities constitute only a partial completion of one refueling outage and other outage inspection samples as defined in Inspection Procedure 71111.20-05.

b. Findings

No findings were identified.

.2 Forced Outage

a. Inspection Scope

The inspectors reviewed the outage safety plan and contingency plans for Unit 3 Forced Outage F3C16, which started January 31, 2012, to confirm that licensee personnel had appropriately considered risk, industry experience, and previous site-specific problems in developing and implementing a plan that assured maintenance of defense-in-depth. During the forced outage, the inspectors monitored licensee controls over the outage activities listed below.

- Configuration management, including maintenance of defense-in-depth, commensurate with the outage safety plan for key safety functions and compliance with the applicable technical specifications when taking equipment out of service
- Clearance activities, including confirmation that tags were properly hung and equipment appropriately configured to safely support the work or testing

- Installation and configuration of reactor coolant pressure, level, and temperature instruments to provide accurate indication, accounting for instrument error
- Status and configuration of electrical systems to ensure that technical specifications and outage safety-plan requirements were met, and controls over switchyard activities
- Monitoring of decay heat removal processes, systems, and components
- Verification that outage work was not impacting the ability of the operators to operate the spent fuel pool cooling system
- Reactor water inventory controls, including flow paths, configurations, and alternative means for inventory addition, and controls to prevent inventory loss
- Controls over activities that could affect reactivity
- Maintenance of secondary containment as required by the technical specifications
- Refueling activities, including fuel handling and sipping to detect fuel assembly leakage
- Startup and ascension to full power operation, tracking of startup prerequisites, walkdown of the drywell (primary containment) to verify that debris had not been left which could block emergency core cooling system suction strainers, and reactor physics testing
- Licensee identification and resolution of problems related to refueling outage activities

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

Forced Outage F3C16 was still in progress at the end of this inspection period. Consequently, these activities constitute only a partial completion of one forced outage and other outage inspection samples as defined in Inspection Procedure 71111.20-05.

b. Findings

No findings were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the UFSAR, procedure requirements, and technical specifications to ensure that the surveillance activities listed below demonstrated that the systems, structures, and/or components tested were capable of performing their

intended safety functions. The inspectors either witnessed or reviewed test data to verify that the significant surveillance test attributes were adequate to address the following:

- Preconditioning
- Evaluation of testing impact on the plant
- Acceptance criteria
- Test equipment
- Procedures
- Jumper/lifted lead controls
- Test data
- Testing frequency and method demonstrated technical specification operability
- Test equipment removal
- Restoration of plant systems
- Fulfillment of ASME Code requirements
- Updating of performance indicator data
- Engineering evaluations, root causes, and bases for returning tested systems, structures, and components not meeting the test acceptance criteria were correct
- Reference setting data
- Annunciators and alarms setpoints

The inspectors also verified that licensee personnel identified and implemented any needed corrective actions associated with the surveillance testing.

- April 22, 2013, Unit 2, monthly technical specification surveillance of Train B emergency diesel generator
- April 22-24, 2013, Unit 2, inspection of emergency diesel fuel oil buried supply piping for priority assessment of piping integrity
- April 30, 2013, Unit 3, Train B emergency diesel fuel oil Pump 3P094 inservice pump test
- May 14, 2013, Unit 2, Train B emergency diesel generator semiannual surveillance

- June 20, 2013, completed review of Unit 2, emergency chilled water Pump MP160 inservice surveillance test documented in Nuclear Notification NN 202239945

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

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

b. Findings

No findings were identified.

Cornerstone: Emergency Preparedness

1EP4 Emergency Action Level and Emergency Plan Changes (IP 71114.04)

a. Inspection Scope

The NSIR headquarters staff performed an in-office review of Procedures SO123-VIII-10, "Emergency Coordinator Duties," Revision 32, Change 1, and SO123-VIII-40-100, "Dose Assessment," Revision 17 (ADAMS Accession Number ML13085A181).

The licensee determined that, in accordance with 10 CFR 50.54(q), the changes made in the revisions resulted in no reduction in the effectiveness of the Plan and that the revised Plan continued to meet the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. The NRC review was not documented in a safety evaluation report and did not constitute approval of licensee-generated changes; therefore, this revision is subject to future inspection. The specific documents reviewed during this inspection are listed in the Attachment.

These activities constitute completion of two samples as defined in Inspection Procedure 71114.04-02.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

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

40A1 Performance Indicator Verification (71151)

.1 Data Submission Issue

a. Inspection Scope

The inspectors performed a review of the performance indicator data submitted by the licensee for the 4th Quarter 2012 and 1st Quarter 2013 performance indicators for any obvious inconsistencies prior to its public release in accordance with Inspection Manual Chapter 0608, "Performance Indicator Program."

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

b. Findings

No findings were identified.

40A2 Problem Identification and Resolution (71152)

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As part of the various baseline inspection procedures discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that they were being entered into the licensee's corrective action program at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. The inspectors reviewed attributes that included the complete and accurate identification of the problem; the timely correction, commensurate with the safety significance; the evaluation and disposition of performance issues, generic implications, common causes, contributing factors, root causes, extent of condition reviews, and previous occurrences reviews; and the classification, prioritization, focus, and timeliness of corrective actions. Minor issues entered into the licensee's corrective action program because of the inspectors' observations are included in the attached list of documents reviewed.

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

b. Findings

No findings were identified.

.2 Daily Corrective Action Program Reviews

a. Inspection Scope

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

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

b. Findings

No findings were identified.

.3 Selected Issue Follow-up Inspection

a. Inspection Scope

During a review of items entered in the licensee's corrective action program, the inspectors selected a corrective action item documenting:

- April 24, 2013, Unit 2, Nuclear Notification NN 202430029, which documented human performance issues associated unexpected high voltage conditions with Battery Charger 2B015W

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

b. Findings

No findings were identified.

40A5 Other Activities

.1 (Open) Temporary Instruction 2515/182, Review of the Industry Initiative to Control Degradation of Underground Piping and Tanks

Leakage from buried and underground pipes has resulted in ground water contamination incidents with associated heightened NRC and public interest. The industry issued a guidance document, Nuclear Energy Institute 09-14, "Guideline for the Management of Buried Piping Integrity" (ADAMS Accession Number ML1030901420) to describe the goals and required actions (commitments made by the licensee) resulting from this underground piping and tank initiative. On December 31, 2010, the Nuclear Energy

Institute issued Revision 1 to Nuclear Energy Institute 09-14, "Guidance for the Management of Underground Piping and Tank Integrity," (ADAMS Accession Number ML110700122), with an expanded scope of components which included underground piping that was not in direct contact with the soil and underground tanks. On November 17, 2011, the NRC issued Temporary Instruction 2515/182, "Review of the Industry Initiative to Control Degradation of Underground Piping and Tanks," to gather information related to the industry's implementation of this initiative.

a. Inspection Scope

The inspectors reviewed the licensee's programs for buried pipe, underground piping and tanks in accordance with Temporary Instruction 2515/182 to determine if the program attributes and completion dates identified in Sections 3.3 A and 3.3 B of Nuclear Energy Institute 09-14, Revision 1, were contained in the licensee's program and implementing procedures. For the buried pipe and underground piping program attributes with completion dates that had passed, the inspectors reviewed records to determine if the attribute was, in fact, complete and to determine if the attribute was accomplished in a manner which reflected good or poor practices in program management. Specifically, the procedure and oversight aspect of the underground piping program with a completion date of December 31, 2011, was not issued until January 31, 2012. The inspectors noted that the procedure revision was not processed in a timely manner due to poor internal communication and informal administrative control processes. The condition was documented in the licensee's corrective action program as Nuclear Notification NN 201834895.

Based upon the scope described above, Phase I was found to meet all applicable aspects of Nuclear Energy Institute 09-14, Revision 1, as set forth in Table 1 of Temporary Instruction 2515/182 with the one exception discussed above.

b. Findings

No findings were identified.

.2 (Closed) NRC Temporary Instruction 2515/187, Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns

a. Inspection Scope

The inspectors accompanied the licensee on their flooding walkdowns during a previous quarter. This inspection was documented in NRC Inspection Report 05000361; 05000362/2012004.

The inspectors independently performed their flooding walkdowns on March 21 and 22, 2013, of the Units 2 and 3, emergency diesel generator buildings, berm and catch basins along Interstate 5, flood sensors and waterstop locations in electrical tunnels, and the intake screen area and verified that the licensee confirmed the following flood protection features:

- Visual inspection of the flood protection feature was performed if the flood protection feature was relevant. External visual inspection for indications of degradation that would prevent its credited function from being performed was performed.
- Reasonable simulation was performed.
- Critical SSC dimensions were measured.
- Available physical margin, where applicable, was determined.
- Flood protection feature functionality was determined using either visual observation or by review of other documents.

The inspectors verified that noncompliances with current licensing requirements, and issues identified in accordance with the 10 CFR 50.54(f) letter, Item 2.g of Enclosure 4, were entered into the licensee's corrective action program.

b. Findings

Fukushima Event Response – Flood Protection Walkdown Scoping and Evaluation Process

- .1 Introduction. The inspectors identified one finding of very low safety significance (Green) for the licensee's failure to follow procedures regarding the Fukushima event response for flood protection to comply with NEI 12-07, "Guidelines for Performing Walkdowns of Plant Flood Protection Features, Revision 0-A." Specifically, the licensee failed to evaluate the conduits beneath the grating of the diesel generator building for inclusion in the walkdown scope and failed to establish adequate procedures that included accurate assessment of the Available Physical Margin (APM) of flooding protection features included in the flooding walkdown scope. This finding was entered into the licensee's corrective action program as Nuclear Notifications NN 202369978 and NN 202375161.

Description. The inspectors reviewed Procedure SO23-XV-94, Revision 0, "Flood Protection Walkdown Scoping and Evaluation Process," and also interviewed the station program owner. Specifically, Procedure SO-23-XV-94, step 6.2.2, required that plant configuration shall be compared to the flood protection features credited in the current licensing basis documents for flooding events (e.g., UFSAR, and current drawings). However, during the walkdown, the inspectors noted that several conduits below the grating of the diesel generator building (which would be beneath the current licensing basis flood elevation of 31 feet mean low level water) had not been evaluated for inclusion in the scope of the flooding walkdown scope. These conduits should be evaluated to determine if they are safety-related and, if so, if they would remain available and operable during a flooding event.

This was inconsistent with NEI 12-07, Section 4.1, which stated in part, that plant configuration will be compared to the flood protection features credited in the licensing

basis documents for flooding events (UFSAR and current drawings). Further, Section 4.2 stated, in part, that each licensee shall review existing (current) design and licensing documents to identify site-specific features credited for protection and mitigation against flooding events.

Additionally, Procedure SO-23-XV-94, step 6.8, "Performing the Visual Inspection of Flood Protection and Mitigation Features," solely referenced Part C of the walkdown record as documentation for completion of this task, without identifying the subtasks associated with the steps for completion of Part C. Part C of the walkdown record included six questions that must be answered and a comments section to be filled out, including determination of the APM. In reviewing the other sections of this procedure, it was evident that the walkdown record was used as the template, with inclusion of all systematic questions, and Part C was the only exception. It appeared that this inconsistency was cause for the APM being missed or not emphasized in all components. This resulted in the walkdown records requiring the step for determination of the APM in Parts C and D; however, the actual determination was not included on components that did not receive a visual inspection and were listed as not applicable (N/A) on other components. For example, for the mechanical seal penetrations on containment that did not receive visual inspection, the determination of APM was left blank. Another example is the nonwatertight doors on the diesel generator room, which have an elevation of 30 feet 6 inches. According to the UFSAR, Section 2.4, the bounding design basis flood hazard level is the probable maximum precipitation resulting in a postulated flood elevation of 31.0 feet mean low level water. Therefore, this door would have a negative APM of approximately 0.5 feet or 6 inches. However, on the licensee's walkdown record, this line item was listed as N/A.

This is inconsistent with NEI 12-07, Section 3.13, which stated, in part, that APM is the difference between licensing basis flood height and the flood height at which water could affect an SSC important to safety. Subparagraph 3), Site Drainage Conditions During Local Intense Precipitation, stated that if the site design basis flood elevation is controlled by a local-intense precipitation and ponding, the APM should be computed relative to this elevation.

Analysis. The inspectors determined that the failure to evaluate the conduits beneath the grating of the diesel generator building for inclusion in the walkdown scope and failure to establish adequate procedures constitute a performance deficiency. Using the guidance in IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Screening," the inspectors determined that the performance deficiency is more than minor, and therefore a finding, because it is associated with the Mitigating Systems Cornerstone attribute of Protection Against External Factors (Flood Hazard) and it adversely affects the associated cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences.

The inspectors determined that the finding could be evaluated using the significance determination process in accordance with IMC 0609, "Significance Determination Process," and conducted a Phase 1 characterization and initial screening. Phase 1 initial screening determined that IMC 0609 Appendix A, Exhibit 2, "Mitigating Systems

Screening Questions,” should be used. Because the finding did not involve the loss or degradation of equipment or function specifically designed to mitigate a seismic, flooding, or severe weather initiating event (e.g., seismic snubbers, flooding barriers, tornado doors), the finding screened as Green. The finding has a cross-cutting aspect in the area of human performance, associated with the decision-making component, because the licensee did not verify the validity of the underlying assumptions and identify possible unintended consequences [H.1(b)].

Enforcement. This finding does not involve enforcement action because no violations of NRC regulatory requirements were identified. Because this finding does not involve a violation and is of very low safety significance, it is identified as FIN 05000361;362/2013003-01, “Failure to Properly Scope All the Pertinent External Flood Protection Features into the Walkdown List in Accordance with Industry Guidance NEI 12-07.”

- .2 Introduction. The inspectors identified an unresolved item for a potentially inadequate procedure for response to external flooding events and potential failure to follow procedures to complete an appropriate evaluation for inaccessible flood protection features.

Description. The inspectors reviewed alarm response Procedure SO23-15-57.C, “Alarm Response Instruction,” Revision 28, which included a guide for identifying which flood sensor area was transmitting the alarm to the control room. The procedure included step 1.0, “Required Actions,” step 2.0, “Corrective Actions,” step 3.0, “Associated Responses,” and step 4.0, “Compensatory Actions.” Step 1.0 included immediately dispatching an operator to ensure doors and manholes in the area were closed. Step 2.0 listed specific causes that may be the source of internal flooding from specific components (tanks, pumps, valves, etc.). Step 3.0 included steps to isolate or secure the component identified as the cause of the internal flooding, as well as initiation of Procedure SO23-2-16, “Operating Instruction,” Revision 36, for removing water by use of temporary sump pumps for some of the spaces, where other spaces relied on internal sumps. The procedure did not provide details on manpower, equipment locations, equipment maintenance, disposal of flood waters, nor analysis supporting how quickly the water would need to be removed to prevent affecting safety-related equipment or spaces for conditions associated with an external flooding event.

As part of this inspection, the inspectors reviewed Calculation M-0120-015, “Plant Flood Analysis,” which included an assessment of the worst case internal flooding event in spaces, and compared it to external flooding scenarios. Additionally, the inspectors observed that Procedure SO-23-XV-94, step 6.6.2.1.1, required that, if more than one “inaccessible” flood protection feature with potential loss of function is reported, then an evaluation of the aggregate effect on flood protection features must be provided. The licensee did not evaluate a possible common cause failure of these features and its cumulative effect on flooding protection features on site, as required in NEI 12-07, Section 5.1, which stated in part that, if more than one “inaccessible” flood protection feature with potential loss of function is reported, then an evaluation of the aggregate effect flood protection features must be provided. The licensee documented these issues in the corrective action program as Nuclear Notifications NN202370058 and NN202157052.

The inspectors had a number of questions and concerns regarding assumptions and conclusions from the flooding analysis that were not resolved at the end of the inspection period. Additional inspection is necessary to complete the review and determine whether procedures were inadequate for response to external flooding events and whether an evaluation for certain inaccessible flood protection features was appropriate and necessary. As a result, the inspectors identified Unresolved Item URI 05000361;362/2013003-02, "Procedure Adequacy for Responding to External Flooding Events."

40A6 Meetings, Including Exit

Exit Meeting Summary

On June 27, 2013, the inspectors presented the inspection results to Mr. D. Bauder, Vice President and Station Manger, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

T. Adler, Manager, Maintenance/Systems Engineering
C. Amundsen, Operations STA
P. Anderson, Technical Specialist, System Engineering
F. Arsene, Senior Nuclear Engineer, Nuclear Strategic Projects
C. Atooli, Senior Nuclear Engineer, Nuclear Strategic Projects
R. Cho, Protective Coatings Engineer
D. Evans, Manager, Security
T. Gallaher, Manager, Performance Improvement
G. Johnson, Principal Manager, Nuclear Engineering
W. Jump, Director, Work Control
G. Kast, Principal Project Manager, Client Services
L. Kelly, Senior Nuclear Engineer
G. Kline, Senior Director, Engineering and Technical Services
J. Madigan, Director, Nuclear Safety Culture
A. Martinez, Manager, Performance Improvement
C. Mc Andrews, Director, Nuclear Strategic Projects
T. McCool, Plant Manager
M. Pawlaczyk, Technical Specialist, Nuclear Regulatory Affairs
R. Pettus, Nuclear Regulatory Affairs
R. Quam, Manager, Security
M. Russell, Technician Specialist, Health Physics
S. Schott, Work Week Manager
B. Sholler, Director, Maintenance
T. Simmons, Manager, Operations
R. St. Onge, Director, Nuclear Regulatory Affairs
R. Treadway, Manager, Nuclear Regulatory Affairs
J. Tupik, Principal Manager, Work Control
G. Wyatt, Manager, Operations Simulator
S. Wylie, Operations Training Instructor
D. Yarbrough, Director, Operations
J. Bashore, Consultant

NRC Personnel

N. Taylor, Senior Project Engineer

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

2515/182	TI	Review of the Industry Initiative to Control Degradation of Underground Piping and Tanks (Section 4OA5)
05000361/2013003-02 05000362/2013003-02	URI	Procedure Adequacy for Responding to External Flooding Events (Section 4OA5)

Opened and Closed

05000361/2013003-01 05000362/2013003-01	FIN	Failure to Properly Scope All the Pertinent External Flood Protection Features into the Walkdown List in Accordance with Industry Guidance NEI 12-07 (Section 4OA5)
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Closed

2515/187	TI	Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns (Section 4OA5)
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LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO23-13-8	Severe Weather Operations	18

NUCLEAR NOTIFICATIONS

202424168	202227435	202384189
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Section 1R04: Equipment Alignment

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO23-2-8.1	Saltwater Cooling System Removal and Return to Service Evolutions	22
SO23-11-1	Domestic and Service Water System	34
SO23-2-13.1	Diesel Generator Alignments	17
SO123-I-1.34	Scaffolding Erection	36
SO23-2-8.1	Saltwater Cooling System Removal/Return to Service Evolutions	22
SO23-2-8	Saltwater Cooling System Operations	43
SO23-3-2.11	Spent Fuel Pool Operations	36

NUCLEAR NOTIFICATIONS

202374629	201878904	202437707	202307918	202414548
202414606	202322437	202339673		

WORK ORDERS

800836093	800707455
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MISCELLANEOUS

TITLE

REVISION

2-SWDW-12001- C17MW504	Alignment Tag Out		0
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Section 1R05: Fire Protection

NUCLEAR NOTIFICATIONS

201908730	202291147	201878904	200950361	202224784
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DRAWING

TITLE

REVISION

23AC24.DWG	Pre-Fire Plans Unit 2/3 Elevation 70'-0" Auxiliary Control and Turbine	8
23UN19.DWG	Saltwater Intake Area Elevation (-)9' to +9" Pre-fire Plans	7

MISCELLANEOUS

TITLE

REVISION

23AC23.DWG	SONGS Pre-Fire Plan Unit 2/3 Auxiliary Control Building Elevation 50'-0"	9
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Section 1R11: Licensed Operator Requalification Program

PROCEDURE

TITLE

REVISION

SO23-14-10	Safety Function Status Checks	3
SO23-12-8	Station Blackout	23
SO23-12-11	EOI supporting Attachments	15

Section 1R12: Maintenance Effectiveness

PROCEDURE

TITLE

REVISION

SO123-I-1.11.4	Site Coating Procedure for Level 2 and Level 4 Coatings	15
SO23-V-8.3	External Corrosion and Aging Program	1

NUCLEAR NOTIFICATIONS

202227768 202409239

Section 1R18: Plant Modifications

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO123-I-1.34	Scaffolding Erection	36
SO123-XV-1.20	Seismic Controls	6

NUCLEAR NOTIFICATIONS

202429604 202428444 202429333

WORK ORDERS

800638807 801023038 800638807 801023038
800918287

Section 1R19: Postmaintenance Testing

NUCLEAR NOTIFICATIONS

202396872 202388598 202402303

WORK ORDERS

801044275 801044540 801046542

Section 1R22: Surveillance Testing

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO23-3-3.60	Diesel Fuel Oil Transfer Pump and Valve Testing	10
SO23-3-3.23, Attachment 10	Diesel Generator G003 Semi-Annual Surveillance	64
SO23-3-3.23, Attachment 4	Diesel Generator G003 Support Systems Surveillances	64
SO23-3-3.60	Inservice testing Programs	13
SO23-3-3.60.9	Emergency Chilled Water Pump Test	9

NUCLEAR NOTIFICATIONS

202034086	202421534	202039037	202147515	202348550
202421534	202436269	202243141		

WORK ORDERS

800994084	801046542
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<u>CALCULATION</u>	<u>TITLE</u>	<u>REVISION</u>
E4C-098	4 kV Switchgear Protective Relay Setting	3

Section 1EP4: Emergency Action Level and Emergency Plan Changes

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO123-VIII-10	Emergency Coordinator Duties	32 EC 1
SO123-VIII-40.100	Dose Assessment	17

Section 4OA2: Identification and Resolution of Problems

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO123-XV-HU-3	Written Instruction Use and Adherence	12
SO123-0-A3	Procedure Use	16

NUCLEAR NOTIFICATIONS

202430029	202463366	202305627	201879887	202117826
202196493	202259847	202195384	202429932	202430045
202316258				

WORK ORDER

800942701

Section 4OA5: Other Activities

<u>PROCEDURE</u>	<u>TITLE</u>	<u>REVISION</u>
SO23-V-102	SONGS Protective Coating Program	0
SO23-V-8.19	Evaluation of Coatings Used in Safety Related Applications	1
SO23-V-8.3	External Corrosion and Aging Program	1

SO123-I-1.11.3	Site Coating Procedure for Level 3 Coatings for Immersion Service Outside the Containment	10
SO123-XV-110	Underground Piping and Tank Integrity Program	3
SO123-XXIX-14.101	Excavation and Backfill	3
SO123-I-1.7	Work Order Preparation and Processing	54
SO123-XV-110.1	Buried Piping Inspection	0
SO123-XV-HU-3	Written Instruction Use and Adherence	12
SO-23-XV-94	Fukushima Event Response – Flood Protection Walkdown Scoping and Evaluation Process	0
SO-23-SV-93	Fukushima Event Response – Flood Protection Walkdown Inspection Process	1
SO-23-15-57.C	Alarm Response Instruction	28

NUCLEAR NOTIFICATIONS

202051250	202157009	202085502	202034086	201834895
201899774				

WORK ORDERS

800994084	800865889	800994083
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MISCELLANEOUS

<u>TITLE</u>	<u>DATE</u>
NEI 09-14 Deviation Form on Missed Initiative Goal	February 14, 2012
San Onofre Unit 1 and Unit 2 Flooding Walkdown Record Forms	