



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

May 22, 2015

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
NextEra Energy
P.O. Box 14000
Juno Beach, FL 33408-0420

**SUBJECT: ST. LUCIE PLANT UNIT 1 – U.S. NUCLEAR REGULATORY COMMISSION
POST-APPROVAL SITE INSPECTION FOR LICENSE RENEWAL, INSPECTION
REPORT 05000335/2015009**

Dear Mr. Nazar:

On April 9, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed a Post-Approval Site Inspection for License Renewal at your St. Lucie Plant, Unit 1, in accordance with NRC Inspection Procedure 71003. On April 9, 2015, the NRC inspectors discussed the results of this inspection with Mr. Christopher Costanzo and other members of your staff. Inspectors documented the results of this inspection in the enclosed inspection report (IR).

The NRC inspectors did not identify any findings or violations of more than minor significance.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public inspections, exemptions, requests for withholding" of the NRC's "Agency Rules of Practice and Procedure," 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

M. Nazar

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Sincerely,

/RA/

Shakur A. Walker, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 50-335
License No. DPR-67

Enclosures:
NRC Post-Approval Site Inspection
For License Renewal, IR 05000335/2015009
w/Attachment: Supplementary Information

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**U.S. NUCLEAR REGULATORY COMMISSION
REGION II**

Docket No: 05000335

License No: DPR-67

Report No: 05000335/2015009

Licensee: Florida Power & Light Company

Facility: St. Lucie Plant, Unit 1

Location: 6501 S. Ocean Drive
Jensen Beach, FL 34957

Dates: March 30 – April 9, 2015

Inspectors: Michael Coursey, Reactor Inspector

Approved by: Shakur A. Walker, Chief
Engineering Branch 3
Division of Reactor Safety

Enclosure

SUMMARY

Inspection Report (IR) 05000335/2015009; March 30 – April 9, 2015; St. Lucie Plant, Unit 1; Post-Approval Site Inspection for License Renewal, Phase 1

This report covers an inspection conducted by one regional inspector in accordance with NRC Inspection Manual Chapter 2515 and NRC Inspection Procedure 71003.

Based on the sample selected for review, the inspectors determined that commitments, license conditions, and regulatory requirements associated with the renewed facility operating license were met. The inspectors also determined that the licensee had administrative controls in place to ensure completion of pending actions scheduled both prior and during the period of extended operation.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

No findings were identified.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA5 Other Activities

.1 Post-Approval Site Inspection for License Renewal – Inspection Procedure 71003 (Phase 1)

a. Inspection Scope

(1) Implementation of License Conditions and Commitments, including Aging Management Programs

The inspectors reviewed a sample of license renewal activities scheduled for the Unit 1 spring 2015 refueling outage, which was the last outage prior to the period of extended operation (PEO). The inspectors selected this refueling outage because it would present the best opportunity to observe the implementation of Aging Management Programs (AMPs) associated with license renewal commitments specific to Unit 1. The inspection objective was to maximize observations of the actual implementation of license renewal activities before the beginning of the PEO (March 1, 2016), and to verify that the licensee completed the necessary actions to: (a) comply with the conditions stipulated in the renewed facility operating license; (b) meet the license renewal commitments described in NUREG-1779, Safety Evaluation Report (SER) Related to the License Renewal of St. Lucie Nuclear Plant, Units 1 and 2, dated September 2003 (ADAMS Accession Number ML032940205); and (c) meet the future inspection activities described in the Updated Final Safety Analysis Report (UFSAR) supplement submitted pursuant to 10 CFR 54.21(d). The license renewal application (LRA) for St. Lucie, Units 1 and 2, and the corresponding NRC SER, documented in NUREG-1779, is publicly available on ADAMS under Accession Numbers ML013400155 and ML032940205, respectively.

The inspectors reviewed the licensing basis and program basis documents of these programs; and for select programs, implementing procedures, applicable condition reports, and work orders, as necessary, to verify that the selected AMPs were implemented as described in the LRA. Additionally, the inspectors conducted interviews with licensee staff, observed in-process outage activities, and performed visual inspection of structures, systems, and components (SSCs), including those not accessible during power operation. The commitment items and AMPs selected for the inspection sample are summarized below, based on their description in Appendix A of the LRA, and their respective UFSAR description. The specific additional inspection activities conducted for each AMP are also described below. Specific documents reviewed are listed in this report's Attachment.

Updated Final Safety Analysis Report, Section 18.1.1 – Condensate Storage Tank Cross-Connect Buried Piping Inspection [NUREG-1779, Commitment No. 1]:

This commitment specified that prior to the end of the initial operating license term for Unit 1, a one-time visual inspection would be performed to determine the extent of the

loss of material, due to pitting and microbiologically influenced corrosion, on the external surfaces of the buried piping that connects the St. Lucie Unit 1 and Unit 2 condensate storage tanks (CSTs). The results of this inspection were evaluated to determine the need for additional inspections.

The inspectors verified that the licensee developed procedures, and attempted to conduct inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors reviewed the documentation of the inspection of the CST Cross-Connect Buried Piping Inspection, initiated per the commitment, to verify that inspection procedures (IPs) were followed, and any adverse conditions found were entered in the licensee corrective action program (CAP) and evaluated properly, in accordance with the license renewal commitment. The inspectors identified one observation for this AMP that is detailed in the Findings and Observations section of this report (4OA5.1.b).

Updated Final Safety Analysis Report, Section 18.1.2 – Galvanic Corrosion Susceptibility Inspection Program [NUREG-1779, Commitment No. 2]:

This commitment specified that prior to the end of the initial operating license terms for Units 1 and 2, selected one-time inspections on the surfaces of piping and components with the greatest susceptibility for galvanic corrosion, would be conducted to manage the aging effect of loss of material due to galvanic corrosion on the surfaces of susceptible piping and components. Baseline examinations (visual inspection or volumetric examinations) in select systems were performed and evaluated to establish if this corrosion mechanism was active. Evaluation of the inspection results considered the minimum required wall thickness for the component, consistent with the applicable design codes. Based on the results of these inspections, the need for followup examinations or programmatic corrective actions were established.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors directly observed the visual examination inspection of valve SR-14-8B in the Component Cooling Water system for line 1 1/2-CC-229 with a stainless steel flexitallic gasket, to verify that IPs were followed, and any adverse conditions found were entered in the licensee CAP and evaluated properly, in accordance with the license renewal commitment.

Updated Final Safety Analysis Report, Section 18.1.5 – Small Bore Class 1 Piping Inspection Program [NUREG-1779, Commitment Nos. 6 and 7]:

These commitments specified that prior to the end of the initial operating license terms for Units 1 and 2, selected one-time volumetric inspections and destructive examinations of a sample of small bore Class 1 piping, would be performed to determine if cracking is an aging effect requiring management during the PEO. This one-time inspection addressed Class 1 piping less than 4 inches in diameter. Based on the results of these inspections, the need for additional inspections or programmatic corrective actions were established.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors performed a review of the samples that the licensee selected, and a walkdown of the areas where the samples were taken (1-CH-001, 1-CH-004, 1-CH-008, 1-SI-040, and 1-SI-048), to verify that they were performed in accordance with the license renewal commitment. The inspectors identified one observation for this AMP that is detailed in the Findings and Observations section of this report (4OA5.1.b).

Updated Final Safety Analysis Report, Section 18.1.6 – Thermal Aging Embrittlement of Cast Austenitic Stainless Steel Program [NUREG-1779, Commitment No. 8]:

This commitment specified that continuing through the PEO, the licensee would perform a determination of the susceptibility of Class 1 Cast Austenitic Stainless Steel (CASS) piping components to thermal aging embrittlement, and would provide for the subsequent aging management of those components that were identified as being potentially susceptible. Aging management, if required, would be accomplished through either enhanced volumetric examination, or plant-specific or component-specific flaw tolerance evaluation.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors performed a direct observation of phased array ultrasonic testing of a CASS 1A2 Safety Injection line, RC-154-FW-2, and watched the performance of analysis by a qualified examiner/analyst, to verify that they were performed in accordance with the license renewal commitment. The examination results were evaluated and dispositioned in accordance with the acceptance criteria specified in licensee procedures.

Updated Final Safety Analysis Report, Section 18.1.7 – Containment Cable Inspection Program [NUREG-1779, Commitment No. 19]:

This commitment specified that continuing through the PEO, the potential aging of non-EQ cables and connections would be managed. This program included non-EQ cables and connections associated with sensitive low-level signal circuits. The only non-EQ cables and connections associated with sensitive low-level signal circuits, within the scope of license renewal for the licensee, are those associated with the neutron detectors. This AMP consisted of periodic visual inspection of accessible non-EQ cables and connections, within the scope of license renewal, located in the containment that may be installed in adverse localized environments; and review of calibration tests results for indication of age-related degradation of cables associated with the neutron detectors.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors reviewed the records of the inspections performed during the

fall 2013 refueling outage, and performed a walkdown of the containment cable penetration areas inspected, to verify that they were performed in accordance with the license renewal commitment.

Updated Final Safety Analysis Report, Section 18.2.9 – Flow Accelerated Corrosion Program [NUREG-1779, Commitment No. 15]:

This commitment specified that continuing through the PEO, the Flow Accelerated Corrosion (FAC) Program managed the aging effect of loss of material due to flow accelerated corrosion. The FAC Program predicted, detected, monitored, and mitigated FAC in high energy carbon steel piping associated with the Main Steam, Reactor Coolant (steam generators), Main Feedwater, and Blowdown Systems; and was based on industry guidelines and experience. The program included analysis and baseline inspections; determination, evaluation, and corrective actions for affected components; and followup inspections. Due to FAC and external general corrosion, the FAC Program was enhanced to address internal and external loss of material of drain lines, and selected steam trap lines.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors performed a direct observation of FAC inspections at inspection points 26 and 27, in the Main Feed Water system, to verify that they were performed in accordance with the license renewal commitment.

Updated Final Safety Analysis Report, Section 18.2.11 – Periodic Surveillance and Preventive Maintenance Program [NUREG-1779, Commitment No. 16]:

This commitment specified that continuing through the PEO, the Periodic Surveillance and Preventive Maintenance (PM) Program managed the aging effects of loss of material, cracking, loss of seal, and fouling (mechanical components only) for various plant SSCs. The scope of the program provided for visual examination of selected surfaces of specific SSCs. Additionally, the program provided for replacement/refurbishment of selected components on a specified frequency, as appropriate, and periodic sampling and water removal from fuel oil storage tanks. The frequency of inspections vary depending on the specific component, the aging effect being managed, and plant operating experience.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors performed a direct observation of a PM on the 1A1 Containment Fan Cooler inspection, to verify that it was performed in accordance with the license renewal commitment.

Updated Final Safety Analysis Report, Section 18.2.14 – Systems and Structures Monitoring Program [NUREG-1779, Commitment No. 18]:

This commitment specified that continuing through the PEO, the Systems and Structures Monitoring Program managed the aging effects of loss of material, cracking, fouling

(for mechanical components only), loss of seal, and change in material properties. The program provided for periodic visual inspection and examination for degradation of accessible surfaces of specific SSCs and corrective actions, as required, based on these inspections. The program was enhanced to provide guidance for managing the aging effects of inaccessible concrete, inspection of insulated equipment and piping, and evaluating masonry wall degradation and uniform corrosion.

The inspectors verified that the licensee developed procedures and conducted inspections, as described in the Program Basis Document and the UFSAR. The inspectors also verified that the inspections were appropriately scheduled and tracked. Additionally, the inspectors performed direct observations of the following systems/structures to verify they were performed in accordance with the license renewal commitment:

- A walkdown of the Unit 1 containment on all readily accessible levels including the Polar Crane walkway (independent inspector walkdown)
- A walkdown of the Steam Generator 1A, 1B, and Pressurizer concrete cubicles including visual inspection of the superstructures (inspector monitored observation of licensee activities)
- Containment Spray Systems walkdown inside containment with the systems engineer (inspector monitored observation of licensee activities)
- Intake Cooling Water Systems walkdown of the 1A1 and 1A2 intake wells and the Intake Cooling Water pit with the systems engineer (inspector monitored observation of licensee activities)

(2) Review of Newly-Identified Structures, Systems, and Components

This inspection requirement will be completed during the Phase 2 implementation of IP 71003.

(3) Review of the Description of Aging Management Programs and Time-Limited Aging Analysis in the Updated Final Safety Analysis Report Supplement

As part of the review of implementation activities for the selected AMPs, described in Section 4OA5.1.a(1) of this report, the inspectors reviewed the corresponding UFSAR sections to verify that the program descriptions were consistent with the licensing basis. The inspectors reviewed three versions of the UFSAR supplement for license renewal as follows:

- The inspectors reviewed the last revision of the UFSAR supplement submitted with the LRA (listed in Appendix B of the LRA) to identify the program attributes, and future inspection activities that were originally relied upon for the approval of the renewed operating license.
- The inspectors reviewed the last revision of the UFSAR submitted to the NRC pursuant to the requirements in 10 CFR 50.71(e)(4), to verify that the UFSAR supplement for license renewal was included with the updated FSAR, as required by the renewed operating license.
- The inspectors reviewed the latest revision of the UFSAR supplement for license renewal (a.k.a. "Living FSAR"), to verify that the program attributes and inspection

activities were consistent with the AMPs as originally approved by the NRC, and subsequent revisions performed under the provisions of 10 CFR 50.59.

(4) Review of License Renewal Commitment Changes

As part of the review of license renewal commitments described in Section 4OA5.1.a(1) of this report, the inspectors reviewed license renewal commitment change documents to verify the licensee followed the guidance in Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," for any change to the commitments, including their elimination. The inspectors verified that the licensee properly evaluated, reported, and approved, where necessary, changes to license renewal commitments listed in the UFSAR in accordance with 10 CFR 50.59.

The inspectors also reviewed the licensee's procedures for commitment revision to obtain reasonable assurance that future changes to (or elimination of) license commitments would follow the guidance in NEI 99-04, and would properly evaluate, report, and approve changes to license renewal commitments listed in the UFSAR, in accordance with 10 CFR 50.59.

During the course of the Unit 1 spring 2015 refueling outage, the licensee identified potential commitment changes to the CST Cross-Connect Buried Piping Inspection AMP, and the Small Bore Class 1 Piping AMP. The details of which are documented as observations in the Findings and Observations section below.

b. Findings and Observations

No findings were identified. Based on the review of licensee actions completed at the time of this inspection, and the timeliness of those actions, the inspectors determined that the implementation of AMP activities reviewed during the Unit 1 spring 2015 refueling outage were consistent with license renewal commitments, license conditions, and applicable regulatory requirements. The inspectors also determined that the licensee had administrative controls in place to ensure completion of pending actions scheduled both prior to and during the PEO.

The following observation for the CST Cross-Connect Buried Piping Inspection AMP was identified:

- The licensee's SER for CST Cross-Connect Buried Piping Inspection states in part, "...the inspection provides for visual examination of the external surfaces of buried CST cross-connect pipe to detect loss of material. The applicant also stated that the Condensate Storage Tank Cross-Connect Buried Piping Inspection Program will use techniques with demonstrated capability and a proven industry record to assess external surface conditions of the buried portions of stainless steel." Additionally, the licensee's UFSAR Section 18.1.1 states, "A one-time visual inspection will be performed to determine the extent of the loss of material due to pitting and microbiologically influenced corrosion on the external surfaces of the buried piping that connects the St. Lucie Unit 1 and Unit 2 condensate storage tanks. The results of this inspection will be evaluated to determine the need for additional inspections." The inspectors noted that in implementing this AMP, the licensee determined that the subject CST Cross-Connect buried piping was encased in concrete, and was unable to be inspected.

The licensee entered this condition into their CAP as Action Request (AR) 2036344 to evaluate the necessity of a commitment change to this AMP.

The following observation for the Small Bore Class 1 Piping AMP was identified:

- By letter dated September 3, 2014, (ADAMS accession number ML14261A107), the licensee submitted their Inspection Plan for Small Bore Class 1 Piping, in accordance with the commitments set forth in the SER. In this commitment letter, the licensee stated in Section 4, Description of Aging Effects, "The one-time inspection to detect cracking in socket welds will be either a volumetric or destructive examination. The inspection to detect cracking resulting from thermal and mechanical loading, vibration, or intergranular stress corrosion of full penetration welds will be a volumetric examination. Volumetric examination will be performed using demonstrated techniques from the ASME Code that are capable of detecting the aging effects in the examination volume of interest." Additionally, the licensee's plan stated, "The inspection sample size will be at least 3 percent, up to a maximum of 10 welds, of each weld type, for each operating unit using a methodology to select the most susceptible and risk-significant welds, from the risk-informed approach as described above. For socket welds, destructive examination may be performed in lieu of volumetric examinations. Because more information can be obtained from a destructive examination than from nondestructive examination, credit will be taken for each weld destructively examined equivalent to having volumetrically examined two welds."

Accordingly, the licensee selected a total number of five destructive examinations on socket welds, and three volumetric examinations on full penetration welds, to represent their Small Bore Class 1 inspection program. During the spring 2015 refueling outage, the licensee was unable to effectively employ volumetric examinations on one of the full penetration samples selected for examination during the outage. The licensee opted to perform destructive testing on the sample. This changed the sample tally to five destructive examinations on socket welds, one destructive examination on full penetration welds, and two volumetric examinations on full penetration welds. The licensee documented this condition in AR 2038628 to evaluate the necessity of a commitment change to this AMP.

4OA6 Management Meetings

.1 Exit Meeting Summary

On April 9, 2015, the inspectors presented the inspection results to Mr. Christopher Costanzo, Site Vice President, and other members of the licensee staff. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: Supplementary Information

SUPPLEMENTARY INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel:

L. Berry, Principal Nuclear Engineer, Site Licensing
P. Atkinson, License Renewal Programs Coordinator

LIST OF ITEMS OPENED, CLOSED, DISCUSSED, AND UPDATED

None

LIST OF DOCUMENTS REVIEWED

Corrective Action Documents

AR 1978792, AR 1996725, AR 2033148, AR 2036040, AR 2036197, AR 2036344, AR 2036513, AR 2037148, AR 2037173, AR 2037194, AR 2037828, AR 2037850, AR 2037852, AR 2037951, AR 2038389, AR 2038614, AR 2038628, AR 2038788, AR 2038792, AR 2038797, AR 2038798, AR 2038799, AR 2038800, AR 2038831, AR 2038834, AR 2039224

Drawings

8770-B-124 Sh. RC-18, Rev. 4
8770-B-124 Sh. RC-19, Rev. 4
8770-B-124 Sh. RC-20, Rev. 4
01-022-A, Loop 1A2 Safety Injection Piping Inside Containment, Rev. 5

Other Documents

EN-AA-106-1002, Renewed License Phase 2 Inspection Notebooks, Book 29, Containment Cable Inspection Program
SPEC-E-022, Containment Cable Inspection Program St Lucie Units 1 and 2, Rev. 2
Deviation from EPRI MRP-146 Rev. 1 Inspection Schedule - NEI 03-08 Needed Work Product Element, dated November 12, 2013
ER-AA-102, Underground Piping and Tanks Integrity Program, Rev. 7
General Engineering Examination Report 15-014, 1-CC-225 at SR-14-8B, dated 4/3/2015
General Engineering Examination Report 15-001, Generator 1A2 Radiator and Tubing, dated 1/6/2015
Plant Saint Lucie Unit 1 Updated Final Safety Analysis Report, Amendment No. 25 (04/12)
Plant Saint Lucie Unit 1 Updated Final Safety Analysis Report, Amendment No. 26A

Procedures

ER-AA-102-1000, Underground Piping and Tanks Integrity Examination Procedure, Rev. 2
LI-AA-101-1005, NRC Commitment Management, Rev. 2

Program Basis Documents

PSL-ENG-LRAM-01-023, CST Cross Connect Buried Piping Inspection License Renewal Basis Document, Rev. 2

PSL-ENG-LRAM-00-110, Galvanic Corrosion Susceptibility Inspection Program License Renewal Basis Document, Rev. 4
PSL-ENG-LRAM-00-117, Small Bore Class 1 Piping Inspection License Renewal Basis Document, Rev. 2
PSL-ENG-LRAM-14-001, St. Lucie Unit 1 ASME Code Class 1 Small-Bore Piping One Time Inspection Plan, Rev. 0
PSL-ENG-LRAM-01-022, Thermal Aging Embrittlement of CASS Program License Renewal Basis Document, Rev. 0
PSL-ENG-LRAM-02-029, Containment Cable Inspection Program License Renewal Basis Document, Rev. 4
PSL-ENG-LRAM-00-091, Flow Accelerated Corrosion Program License Renewal Basis Document, Rev. 4
PSL-ENG-LRAM-00-096, Periodic Surveillance and Preventive Maintenance Program License Renewal Basis Document, Rev. 7
PSL-ENG-LRAM-00-095, Systems and Structures Monitoring Program License Renewal Basis Document, Rev. 5

Work Orders

Work Order 40318023, Task 04, RCB Annulus: SL126 Inspect/Repair Moisture Seal
Work Order 40308275, Inspect RC-154-FW-2 DM Weld

LIST OF ACRONYMS

AMPs	Aging Management Programs
AR	Action Request
CAP	Corrective Action Program
CASS	Cast Austenitic Stainless Steel
CSTs	Condensate Storage Tanks
FAC	Flow Accelerated Corrosion
IPs	Inspection Procedures
LRA	Licensee Renewal Application
NEI	Nuclear Energy Institute
PEO	Period of Extended Operation
PM	Preventive Maintenance
SER	Safety Evaluation Report
SSCs	Systems, Structures, or Components
UFSAR	Updated Final Safety Analysis Report