



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

November 12, 2015

Kevin Mulligan
Site Vice President Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

**SUBJECT: GRAND GULF NUCLEAR STATION – NRC INTEGRATED INSPECTION
REPORT 05000416/2015003**

Dear Mr. Mulligan:

On September 30, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Grand Gulf Nuclear Station, Unit 1, and the NRC inspectors discussed the results of this inspection with you and other members of your staff. Inspectors documented the results of this inspection in the enclosed inspection report.

NRC inspectors documented one finding of very low safety significance (Green) in this report. This finding involved a violation of NRC requirements. The NRC is treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2.a of the NRC Enforcement Policy.

If you contest the violation or significance of this NCV, 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 Grand Gulf Nuclear Station.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public

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Sincerely,

/RA/

Greg Warnick, Branch Chief
Project Branch C
Division of Reactor Projects

Docket No. 50-416
License No. NPF-29

Enclosure:
Inspection Report 05000416/2015003
w/ Attachment: Supplemental Information

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Letter to Kevin Mulligan from Greg Warnick dated November 12, 2015

SUBJECT: GRAND GULF NUCLEAR STATION – NRC INSPECTION REPORT
5000416/2015003

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DRS Director (Anton.Vegal@nrc.gov)
DRS Deputy Director (Jeff.Clark@nrc.gov)
Senior Resident Inspector (Matt.Young@nrc.gov)
Resident Inspector (Neil.Day@nrc.gov)
Administrative Assistant (Alley.Farrell@nrc.gov)
Branch Chief, DRP/C (Greg.Warnick@nrc.gov)
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Branch Chiefs, DRP (R4DRP-BC@nrc.gov)
Branch Chiefs, DRS (R4DRS-BC@nrc.gov)
RITS Coordinator (Marisa.Herrera@nrc.gov)
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Regional Counsel (Karla.Fuller@nrc.gov)
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RIV/ETA: OEDO (Cindy.Rosales-Cooper@nrc.gov)
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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 05000416
License: NPF-29
Report: 05000416/2015003
Licensee: Entergy Operations, Inc.
Facility: Grand Gulf Nuclear Station, Unit 1
Location: 7003 Baldhill Road
Port Gibson, MS 39150
Dates: July 1 through September 30, 2015
Inspectors: M. Young, Senior Resident Inspector
N. Day, Resident Inspector
R. Azua, Senior Project Engineer
T. Buchanan, Operations Engineer
M. Hayes, Operations Engineer
C. Osterholtz, Senior Operations Engineer
Approved By: Greg Warnick, Chief, Project Branch C
Division of Reactor Projects

SUMMARY

IR 05000416/2015003; 07/01/2015 – 09/30/2015; Grand Gulf Nuclear Station; Problem Identification and Resolution

The inspection activities described in this report were performed between July 1 and September 30, 2015, by the resident inspectors at the Grand Gulf Nuclear Station and inspectors from the NRC's Region IV office. One finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. The significance of inspection findings is indicated by their color (Green, White, Yellow, or Red), which is determined using Inspection Manual Chapter 0609, "Significance Determination Process." Their cross-cutting aspects are determined using Inspection Manual Chapter 0310, "Aspects within the Cross-Cutting Areas." Violations of NRC requirements are dispositioned in accordance with the NRC Enforcement Policy. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

Cornerstone: Mitigating Systems

- Green. The inspectors reviewed a self-revealing, non-cited violation of Technical Specification 5.4.1.a, for the failure to establish appropriate maintenance instructions to perform maintenance activities on the fuel rack control lever of the division II diesel generator. Specifically, the preventative maintenance instruction did not inspect for foreign material between the fuel rack control lever and the adjacent clamp, which caused the fuel rack control lever to be stuck in the open position. As a result, the division II diesel generator was rendered inoperable and unavailable. On June 28, 2015, the licensee cleaned and lubricated the fuel rack control lever and performed the preventative maintenance instruction to return the division II diesel generator to operable status. The licensee entered this issue into their corrective action program as Condition Report CR-GGN-2015-3741.

This performance deficiency is more than minor, and therefore a finding, because it is associated with the equipment performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," and Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," the inspectors determined that the finding is of very low safety significance (Green) because it: (1) was not a deficiency affecting the design or qualification of a mitigating structure, system, or component, and did not result in a loss of functionality; (2) did not represent a loss of system and/or function; (3) did not represent an actual loss of function of at least a single train for longer than its technical specification allowed outage time, or two separate safety systems out-of-service for longer than their technical specification allowed outage time; and (4) did not represent an actual loss of function of one or more non-technical specification trains of equipment designated as high safety significant in accordance with the licensee's maintenance rule program.

The mechanical standard was last updated in 2006, and the preventative maintenance instruction was last updated in 2012 for editorial purposes only. The inspectors determined that the cause of the deficiency occurred in 2006, and therefore, determined the finding did

not have a cross-cutting aspect since it is not indicative of current licensee performance.
(Section 40A2)

PLANT STATUS

The Grand Gulf Nuclear Station began the inspection period at 100 percent power.

On July 10, 2015, the operators reduced power to 85 percent to perform partial control rod exercises and pattern adjustment. Upon completion, operators performed power ascension activities to reach 100 percent power on July 11, 2015.

On August 1, 2015, the operators reduced power to 85 percent to perform partial control rod exercises and pattern adjustment. Upon completion, operators performed power ascension activities to reach 100 percent power on August 1, 2015.

From August 22 – 29, 2015, the operators reduced power to 48 percent to perform control rod sequence exchange, settle time testing, SCRAM time testing, and partial control rod exercise. Upon completion, operators performed power ascension activities to reach 100 percent power on August 29, 2015.

From September 13 – 21, 2015, the operators reduced power to 59 percent to perform power suppression testing, partial control rod exercise, and pattern adjustment. Upon completion, operators performed power ascension activities to reach 100 percent power on September 21, 2015. Power remained at essentially 100 percent for the remainder of the inspection period.

REPORT DETAILS

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

On July 30, 2015, the inspectors completed an inspection of the station's readiness for impending adverse weather conditions. The inspectors reviewed plant design features, the licensee's procedures to respond to a severe thunderstorm with high winds, and the licensee's implementation of these procedures. The inspectors evaluated operator staffing and accessibility of controls and indications for those systems required to control the plant.

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

b. Findings

No findings were identified.

1R04 Equipment Alignment (71111.04)

Partial Walkdown

a. Inspection Scope

On July 6, 2015, the inspectors performed a partial system walk-down of the risk-significant system, residual heat removal B in low pressure cooling injection lineup due to residual heat removal A in suppression pool cooling lineup.

The inspectors reviewed the licensee's procedures and system design information to determine the correct lineup for the system. They visually verified that critical portions of the system were correctly aligned for the existing plant configuration.

These activities constitute one partial system walk-down sample, as defined in Inspection Procedure 71111.04.

b. Findings

No findings were identified.

1R05 Fire Protection (71111.05)

Quarterly Inspection

a. Inspection Scope

The inspectors evaluated the licensee's fire protection program for operational status and material condition. The inspectors focused their inspection on six plant areas important to safety:

- July 23, 2015, fire area 25A, room OC302, division I, heating ventilation and air conditioning room
- August 25, 2015, fire area 10, rooms 1A323 and 1A326, standby gas treatment A and B
- September 16, 2015, fire area 25A, rooms OC211 and OC215, division II, switchgear room and battery room
- September 16, 2015, fire area 25A, rooms OC202 and OC207, division I switchgear room and battery room
- September 16, 2015, fire area 25A, rooms OC209, OC210, OC208 and OC208A, division III switchgear room, battery room and emergency hot shutdown room
- September 17, 2015, fire areas 25A and 25B, OC601, OC602, OC603, OC608 and OC614 on elevation 177 ft., control room viewing gallery, corridors, emergency dorm, and technical support conference room

For each area, the inspectors evaluated the fire plan against defined hazards and defense-in-depth features in the licensee's fire protection program. The inspectors evaluated control of transient combustibles and ignition sources, fire detection and suppression systems, manual firefighting equipment and capability, passive fire protection features, and compensatory measures for degraded conditions.

These activities constitute six quarterly inspection samples, as defined in Inspection Procedure 71111.05.

b. Findings

No findings were identified.

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

.1 Review of Licensed Operator Requalification

a. Inspection Scope

On July 22, 2015, the inspectors observed simulator training for an operating crew. The operating crew was involved in a simulated hostile action based event. The inspectors assessed the performance of the operators and the evaluators' critique of their performance. The inspectors also assessed the modeling and performance of the simulator during the simulated event.

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 Review of Licensed Operator Performance

a. Inspection Scope

On September 13, 2015, the inspectors observed the performance of on-shift licensed operators in the plant's main control room. At the time of the observations, the plant was in a period of heightened activity due to performing suppression testing to locate indications of a leaking fuel bundle. Specifically, the inspectors observed the operators' performance during power reduction/increase via control rod manipulations and communications among operations, reactor engineering, and a vendor for grab sample testing.

In addition, the inspectors assessed the operators' adherence to plant procedures, including EN-OP-115, "Conduct of Operations," Revision 15, and other operations department policies.

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

b. Findings

No findings were identified.

.3 Biennial Review

a. Inspection Scope

The licensed operator requalification program involves two training cycles that are conducted over a 2-year period. In the first cycle, the annual cycle, the operators are administered an operating test consisting of job performance measures and simulator scenarios. In the second part of the training cycle, the biennial cycle, operators are administered an operating test and a comprehensive written examination.

To assess the performance effectiveness of the licensed operator requalification program, the inspectors reviewed both the written examination and operating test quality and observed licensee administration of an annual requalification test while onsite. The operating tests observed included 14 job performance measures and 2 scenarios that were used in the current biennial requalification cycle. These observations allowed the inspectors to assess the licensee's effectiveness in conducting the operating test to ensure operator mastery of the training program content and to determine if feedback of performance analyses into the requalification training program was being accomplished.

On September 9, 2015, the licensee informed the inspectors of the completed cycle results for both the written examinations and the operating tests:

- 7 of 8 crews passed the simulator portion of the operating test
- 39 of 45 licensed operators passed the simulator portion of the operating test
- 45 of 45 licensed operators passed the job performance measure portion of the operating test
- 45 of 45 licensed operators passed the written examination

The individuals that failed the simulator scenario portion of the operating test were remediated, retested, and passed their retake test.

The inspectors observed examination security measures in place during administration of the exams (including controls and content overlap) and reviewed any remedial training and re-examinations, if necessary. The inspectors also reviewed medical records of eight licensed operators for conformance to license conditions and the licensee's system for tracking qualifications and records of license reactivation for four operators.

The inspectors reviewed simulator performance for fidelity with the actual plant and the overall simulator program of maintenance, testing, and discrepancy correction.

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

b. Findings

No findings were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

On September 16, 2015, the inspectors reviewed one instance of degraded performance or condition of safety-related structures, systems, and components (SSCs) in their review of the containment cooling filter train B pre-filter differential pressure reading out of parameter "High."

The inspectors reviewed the extent of condition of possible common cause SSC failures and evaluated the adequacy of the licensee's corrective actions. The inspectors reviewed the licensee's work practices to evaluate whether these may have played a role in the degradation of the SSCs. The inspectors assessed the licensee's characterization of the degradation in accordance with 10 CFR 50.65 (the Maintenance Rule), and verified that the licensee was appropriately tracking degraded performance and conditions in accordance with the Maintenance Rule.

These activities constitute completion of one maintenance effectiveness sample, as defined in Inspection Procedure 71111.12.

b. Findings

No findings were identified.

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

a. Inspection Scope

On August 19, 2015, the inspectors reviewed a risk assessment for standby service water B maintenance to inspect sparger area and minor maintenance for the pump. Due to standby service water B being unavailable, this was a yellow probabilistic risk assessment of plant risk.

This risk assessment was performed timely and in accordance with the requirements of Title 10 CFR 50.65 (the Maintenance Rule) and plant procedures. The inspectors reviewed the accuracy and completeness of the licensee's risk assessment and verified that the licensee implemented appropriate risk management actions based on the result of the assessment.

Additionally, on June 28, 2015, the inspectors observed an emergent issue for a stuck open fuel rack linkage on the division II diesel generator when the division III diesel generator had a scheduled air roll, which is a yellow risk activity. The activities were scheduled to be staggered so both diesel generators were not unavailable at the same time.

The inspectors verified that the licensee appropriately developed and followed a work plan for these activities. The inspectors verified that the licensee took precautions to minimize the impact of the work activities on unaffected SSCs.

These activities constitute completion of two maintenance risk assessments and emergent work control inspection samples, as defined in Inspection Procedure 71111.13.

b. Findings

No findings were identified.

1R15 Operability Determinations and Functionality Assessments (71111.15)

a. Inspection Scope

The inspectors reviewed five operability determinations and functionality assessments that the licensee performed for degraded or nonconforming SSCs:

- August 10, 2015, functionality assessment of plant air compressor C due to control valve leakage
- August 19, 2015, operability determination of standby gas treatment system A due to missing wingnut and bracket on the control valve
- August 24, 2015, operability determination of standby liquid control train B due to loss of continuity to the squib valve
- August 27, 2015, operability determination of two primary containment outboard fuel pool drain isolation valves during VIPER testing
- September 22, 2015, operability determination of division III diesel generator lube oil level outside normal level during B engine pre-lube procedure

The inspectors reviewed the timeliness and technical adequacy of the licensee's evaluations. Where the licensee determined the degraded SSC to be operable or functional, the inspectors verified that the licensee's compensatory measures were appropriate to provide reasonable assurance of operability or functionality. The inspectors verified that the licensee had considered the effect of other degraded conditions on the operability or functionality of the degraded SSC.

From July 6 – 8, 2015, the inspectors reviewed operator actions taken or planned to compensate for degraded or nonconforming conditions. The inspectors verified that the licensee effectively managed these operator workarounds to prevent adverse effects on the function of mitigating systems and to minimize their impact on the operators' ability to implement abnormal and emergency operating procedures.

These activities constitute completion of six operability and functionality review samples, which included one operator work-around sample, as defined in Inspection Procedure 71111.15.

b. Findings

No findings were identified.

1R19 Post-Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed three post-maintenance testing activities that affected risk-significant SSCs:

- July 14, 2015, division III diesel generator following unplanned maintenance on the overspeed trip mechanism
- August 19, 2015, dispersed oil particulate testing of standby gas treatment system B and test charcoal change-out
- September 9, 2015, division III diesel generator following unplanned maintenance for fuel injector line leaks and replacement of the lube oil

The inspectors reviewed licensing- and design-basis documents for the SSCs and the maintenance and post-maintenance test procedures. The inspectors observed the performance of the post-maintenance tests to verify that the licensee performed the tests in accordance with approved procedures, satisfied the established acceptance criteria, and restored the operability of the affected SSCs.

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

b. Findings

No findings were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

From August 2 – 3, 2015, the inspectors observed the 24-hour load test and hot restart test for the division I diesel generator surveillance test and reviewed test results to verify that this test adequately demonstrated that the SSCs were capable of performing their safety functions. The inspectors verified that this test met technical specification requirements, that the licensee performed the test in accordance with their procedures, and that the results of the test satisfied appropriate acceptance criteria. The inspectors verified that the licensee restored the operability of the affected SSCs following testing.

These activities constitute completion of one surveillance testing inspection sample, as defined in Inspection Procedure 71111.22.

b. Findings

No findings were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

Training Evolution Observation

a. Inspection Scope

On July 22, 2015, the inspectors observed simulator-based licensed operator requalification training that included implementation of the licensee's emergency plan. The inspectors verified that the licensee's emergency classifications, off-site notifications, and protective action recommendations were appropriate and timely. The inspectors verified that any emergency preparedness weaknesses were appropriately identified by the evaluators and entered into the corrective action program for resolution.

These activities constitute completion of one training observation sample, as defined in Inspection Procedure 71114.06.

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 Security

4OA1 Performance Indicator Verification (71151)

.1 Mitigating Systems Performance Index: High Pressure Injection Systems (MS07)

a. Inspection Scope

The inspectors reviewed the licensee's mitigating system performance index data for the period of July 1, 2014, through June 30, 2015, to verify the accuracy and completeness of the reported data. The inspectors used definitions and guidance contained in Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, to determine the accuracy of the reported data.

These activities constitute verification of the mitigating system performance index for high pressure injection systems, as defined in Inspection Procedure 71151.

b. Findings

No findings were identified.

.2 Mitigating Systems Performance Index: Heat Removal Systems (MS08)

a. Inspection Scope

The inspectors reviewed the licensee's mitigating system performance index data for the period of July 1, 2014, through June 30, 2015, to verify the accuracy and completeness of the reported data. The inspectors used definitions and guidance contained in Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, to determine the accuracy of the reported data.

These activities constitute verification of the mitigating system performance index for heat removal system, as defined in Inspection Procedure 71151.

b. Findings

No findings were identified.

.3 Mitigating Systems Performance Index: Residual Heat Removal Systems (MS09)

a. Inspection Scope

The inspectors reviewed the licensee's mitigating system performance index data for the period of July 1, 2014, through June 30, 2015, to verify the accuracy and completeness of the reported data. The inspectors used definitions and guidance contained in Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, to determine the accuracy of the reported data.

These activities constitute verification of the mitigating system performance index for residual heat removal systems, as defined in Inspection Procedure 71151.

b. Findings

No findings were identified.

40A2 Problem Identification and Resolution (71152)

.1 Routine Review

a. Inspection Scope

Throughout the inspection period, the inspectors performed daily reviews of items entered into the licensee's corrective action program and periodically attended the licensee's condition report screening meetings. The inspectors verified that licensee personnel were identifying problems at an appropriate threshold and entering these problems into the corrective action program for resolution. The inspectors verified that the licensee developed and implemented corrective actions commensurate with the significance of the problems identified. The inspectors also reviewed the licensee's problem identification and resolution activities during the performance of the other inspection activities documented in this report.

b. Findings

No findings were identified.

.2 Semiannual Trend Review

a. Inspection Scope

To verify the licensee was taking corrective actions to address apparent adverse trends that might indicate the existence of a more significant safety issue, the inspectors reviewed corrective action program documentation associated with the secondary containment and standby gas treatment system.

The inspectors decided to focus on the secondary containment and standby gas treatment systems due to an increase of condition reports written in the beginning of August 2015 after the standby gas treatment system was run to support the secondary containment system Surveillance Requirement 3.6.4.1.3.

These activities constitute completion of one semiannual trend review sample, as defined in Inspection Procedure 71152.

b. Observations and Assessments

The inspectors identified a missing bracket on the standby gas treatment system A variable vane motor linkage during inspection of the dispersed oil particulate testing and test canister replacement of standby gas treatment system B. Although the missing bracket did not challenge the standby gas treatment system operability, it revealed a weakness in the licensee's ability to identifying issues during walkdowns, particularly before and during periods when the other train is unavailable.

Secondary containment was tested on August 1, 2015, to prepare for the upcoming dry fuel storage loading campaign. These campaigns occur every two years and coincide with the two-year draw down test frequency requirement of Surveillance Requirement 3.6.4.1.3. The inspectors noted that during the draw down test, many issues were identified and corrected, mostly door seals, which could have been identified between the last draw down test and the dry fuel storage loading campaign.

While interviewing the system engineer for issues related to secondary containment, the inspectors noted the licensee was aware of the current issues with respect to door and floor plug seal leakage and the adverse cumulative effects on secondary containment. The engineer discussed some challenges and enhancements that are being considered in the testing, frequency, and replacement of the door seals that comprise the secondary containment boundary.

c. Findings

No findings were identified.

.3 Annual Follow-up of Selected Issues

a. Inspection Scope

The inspectors selected two issues for in-depth follow-ups:

- On June 27, 2015, while performing a division II diesel generator monthly surveillance test, the right bank number four fuel oil injector pump linkage stuck open, resulting in the diesel generator being declared inoperable. The inspectors observed preventative maintenance activities performed to restore the diesel generator to an operable status. The inspectors also reviewed operating experience, the vendor manual, and the preventative maintenance procedures that the licensee use to ensure that the diesel generator was maintained appropriately.
- On July 17, 2015, the inspectors reviewed Grand Gulf and Energy Solutions pre-shipment leakage test procedures for the Energy Solutions 8-120B Cask (Certificate of Compliance Number 9168). On June 24, 2015, Energy Solutions submitted a 71.95 Report to the NRC due to a non-licensed gasket in the pre-shipment leakage test equipment that had the potential to provide inaccurate, non-conservative test results. The inspectors concentrated the inspection activities on ensuring that Grand Gulf and Energy Solutions had appropriately addressed the forenamed issues and that there is/was no undue risk to public health and safety.

The inspectors assessed the licensee's problem identification threshold, cause analyses, extent of condition reviews, and compensatory actions. The inspectors verified that the licensee appropriately prioritized the planned corrective actions and that these actions were adequate to correct the condition.

These activities constitute completion of two annual follow-up samples, as defined in Inspection Procedure 71152.

b. Findings

Introduction. The inspectors reviewed a Green, self-revealing, non-cited violation of Technical Specification 5.4.1.a, for the failure to establish appropriate maintenance instructions to perform maintenance activities on the fuel rack control lever of the division II diesel generator. Specifically, the preventative maintenance instruction did not inspect for foreign material between the fuel rack control lever and the adjacent clamp, which caused the fuel rack control lever to be stuck in the open position. As a result, the division II diesel generator was rendered inoperable and unavailable.

Description. On June 27, 2015, the licensee was performing a monthly surveillance test on the division II diesel generator. When the diesel generator is started, the governor increases the fuel oil to the engine to a full open position and then regulates the fuel oil based on the load demand. During this surveillance test, when the governor reduced fuel oil to match the load demand, the fuel injector control rack lever for cylinder number four remained in the full open position. This caused the engine's right bank number four cylinder temperature to increase to 1285.7 degrees Fahrenheit and exceeded the maximum allowable temperature limit of 1000 degrees Fahrenheit. This resulted in a

manual shutdown of the diesel generator and an unplanned declaration of inoperability of the diesel generator. The licensee implemented an immediate corrective action to perform Preventative Maintenance Instruction 07-S-24-P75-E001AB-29, "Fuel Rack and Air Manifold Butterfly Valve Maintenance," Revision 6, to both division I and II diesel generators to ensure mobility of the remaining fuel rack control levers.

The licensee performed an apparent cause evaluation and identified that the apparent cause was a lack of guidance to clean and lubricate between the fuel control rack and its clamp. Furthermore, these directions were not contained in Preventative Maintenance Instruction, 07-S-24-P75-E001AB-29. The licensee also identified that the direct cause of the temperature increase was due to the fuel injector control rack lever being stuck in the open or full out position due to foreign material between the lever and the clamp on the fuel rack.

Safety-related Mechanical Standard, GGNS-MS-37, "Mechanical Standard for the Division I and II Standby Diesel Generator Maintenance," Revision 6, described preventative maintenance for the diesel generators based on vendor recommendations. Specifically, for the fuel pump control shaft, which includes the fuel control rack lever, paragraph 02-371A-1 of the standard stated, "Verify that no foreign material, which could inhibit fuel control linkage motion, is present." Preventive Maintenance Instruction 07-S-24-P75-E001AB-29, was developed to implement the preventive maintenance guidance in Mechanical Standard GGNS-MS-37. The licensee failed to incorporate the above guidance into Preventative Maintenance Instruction 07-S-24-P75-E001AB-29 to ensure that no foreign material was present.

Analysis. The failure to establish adequate preventative maintenance instructions to verify that no foreign material was present that could inhibit fuel control linkage motion was a performance deficiency. This performance deficiency is more than minor, and therefore a finding, because it is associated with the equipment performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the preventative maintenance instruction did not inspect for foreign material between the fuel rack control lever and the adjacent clamp, which caused the fuel rack control lever to be stuck in the open position. As a result, the division II diesel generator was rendered inoperable and unavailable. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," and Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," the inspectors determined that the finding is of very low safety significance (Green) because it: (1) was not a deficiency affecting the design or qualification of a mitigating structure, system, or component, and did not result in a loss of functionality; (2) did not represent a loss of system and/or function; (3) did not represent an actual loss of function of at least a single train for longer than its technical specification allowed outage time, or two separate safety systems out-of-service for longer than their technical specification allowed outage time; and (4) did not represent an actual loss of function of one or more non-technical specification trains of equipment designated as high safety significant in accordance with the licensee's maintenance rule program.

The mechanical standard was last updated in 2006, and the preventative maintenance instruction was last updated in 2012 for editorial purposes only. The inspectors determined that the cause of the deficiency occurred in 2006, and therefore, determined

the finding did not have a cross-cutting aspect since it is not indicative of current licensee performance.

Enforcement. Technical Specification 5.4.1.a, requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Section 9.a of Appendix A to Regulatory Guide 1.33, Revision 2, requires procedures for performing maintenance, such that, maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with documented instructions appropriate to the circumstances. Mechanical Standard, GGNS-MS-37, "Mechanical Standard for the Division I and II Standby Diesel Generator Maintenance," Revision 6, described preventative maintenance for the diesel generators based on vendor recommendations, including paragraph 02-371A-1, which stated, "Verify that no foreign material, which could inhibit fuel control linkage motion, is present." The licensee established Preventive Maintenance Instruction 07-S-24-P75-E001AB-29, which implemented Mechanical Standard GGNS-MS-37, to meet the Regulatory Guide 1.33 requirement. Contrary to the above, from April 2007 until June 27, 2015, the licensee failed to establish a Preventative Maintenance Instruction to incorporate vendor recommendations to ensure that no foreign material, which could inhibit fuel control linkage motion, is present. As a result, foreign material caused the division II diesel generator fuel rack control lever to be stuck in the open position, which caused cylinder temperature to exceed the maximum allowable value, and the diesel generator was declared inoperable. The licensee subsequently cleaned and lubricated the fuel rack control lever and performed the preventative maintenance instruction to return the division II diesel generator to operable status on June 28, 2015. Because this finding is determined to be of very low safety significance and has been entered into the licensee's corrective action program as Condition Report CR-GGN-2015-3741, this violation is being treated as a non-cited violation consistent with Section 2.3.2.a of the NRC Enforcement Policy: NCV 05000416/2015003-1, "Failure to Have Appropriate Instructions for Preventative Maintenance on the Division II Diesel Generator Fuel Rack Control Lever."

40A6 Meetings, Including Exit

Exit Meeting Summary

On September 30, 2015, the inspectors briefed the inspection results of the licensed operator requalification program inspection to Mr. K. Mulligan, Site Vice President, and other members of the licensee's staff. The licensee acknowledged the issues presented. The licensee confirmed that any proprietary information reviewed by the inspectors had been returned or destroyed.

On September 30, 2015, the inspectors presented the inspection results to Mr. Kevin Mulligan, and other members of the licensee staff. The licensee acknowledged the issues presented. The licensee confirmed that any proprietary information reviewed by the inspectors had been returned or destroyed.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

B. Busick, Operations Manager
J. Dorsey, Security Manager
V. Fallacara, Manager, Plant Operations
B. Grant, Prod. Manager
G. Hawkins, Senior Manager Site Maintenance Service
G. Hicks, Security
G. Kimich, Lead Exam Developer
R. Liddell, Training Superintendent
E. Meaders, Training Manager
R. Meyer, Operations Manager
R. Miller, Radiation Protection Manager
M. Milley, Senior Maintenance Manager
K. Mulligan, Site Vice President
S. Purdon, Training Instructor
M. Rasch, Training Instructor
S. Reeves, Exam Developer
P. Salgado, Performance Improvement Manager
R. Scarbrough, Senior Licensing Specialist
D. Smith, Training Instructor
J. Sparks, Training Instructor
R. Sumrall, Chemistry Manager
T. Tharp, Training Instructor
D. Wiles, Engineering Director

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000416/2015003-01	NCV	Failure to Have Appropriate Instructions for Preventative Maintenance on the Division II Diesel Generator Fuel Rack Control Lever (Section 4OA2)
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LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
05-1-02-VI-2	Hurricanes, Tornados, and Severe Weather Safety Related	128
EN-FAP-EP-010, Attachment 7.1	Severe Weather Response	1
EN-FAP-EP-010, Attachment 7.15	Severe Weather Response, Severe Weather Missile Hazard Reduction Standard	1

Condition Report (CR)

CR-GGN-1-2015-04469

Section 1R04: Equipment Alignment

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
04-1-01-E12-1	Residual Heat Removal System	144
GG UFSAR 5.4.7	Residual Heat Removal System	
04-1-01-E12-1	Remote Operated Valve Lineup Checksheet	122
06-OP-1E12-M- 0002	LPCI/RHR Subsystem B Monthly Functional Test	115

Drawings

<u>Number</u>	<u>Title</u>	<u>Revision</u>
M-1085C	Residual Heat Removal System Unit 1	12
M-1085A	Residual Heat Removal System Unit 1	69
M-1085C	Residual Heat Removal System Unit 1	18
M-1085B	Residual Heat Removal System Unit 1	62
M-1085D	Residual Heat Removal System Unit 1	4
SFD-1085-002	System Flow Diagram Residual Heat Removal System	7
Figure 5.4-20	MP&L Co. GGNS Units 1 & 2 UFSAR RHR Pump Characteristics Curve	0
UFSAR Figure 5.4-018	System Flow Diagram Residual Heat Removal System	4

Condition Reports (CRs)

CR-GGN-1-2015-03881

CR-GGN- 2015-04763

PR-PRGGN-2015-00505

Section 1R05: Fire Protection

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
Fire Pre-Plan A-28	Standby Gas Treatment A and B	1
GG UFSAR	9A.5.31 Fire Area 31: Division I Switchgear Area, Elevation 111' 0"	
GG UFSAR	9A.5.32 Fire Area 32: Division I Battery Room, Elevation 111' 0"	
GG UFSAR	9A.5.33 Fire Area 33: Emergency Hot Shutdown Room, Elevation 111' 0"	
GG UFSAR	9A.5.34 Fire Area 34: Emergency Hot Shutdown Room, Elevation 111' 0"	
GG UFSAR	9A.5.35 Fire Area 35: Division III Battery Room, Elevation 111' 0"	
GG UFSAR	9A.5.36 Fire Area 36: Division III Switchgear Area, Elevation 111' 0"	
GG UFSAR	9A.5.37 Fire Area 37: Division II Battery Room, Elevation 111' 0"	
GG UFSAR	9A.5.38 Fire Area 38: Division II Switchgear Area, Elevation 111' 0"	
GG UFSAR	9A.5.50 Fire Area 50: Control Building Elevation 177'	
Fire Pre-Plan C-15	OC601 Viewing Gallery; OC602 Corridor; OC603 Emergency Dorm; OC608 Tech. Support Rm; O614 Corridor Elevation 177'	3
Fire Pre-Plan C-07-02	Control Building Elevation 111' 0"	3
Fire Pre-Plan C-07-01	Division II Switchgear Room and Battery Room OC211 and OC215, Area 25A, Elevation 111'	4
FPP-Vol-01-0-026	Unit 1 Fire Pre-Plan Volume 1	26
FPP-Vol-01-0-027	Unit 1 Fire Pre-Plan Volume 2	27

Section 1R11: Licensed Operator Requalification Program and Licensed Operator Performance

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
EN-FAP-OP-006	Operator Aggregate Impact Index Performance Indicator	2
02-S-01-37	Control Position Control	10
EN-TQ-202	Simulator Configuration Control	9
EN-TQ-114	Licensed Operator Requalification Training Program Description	9
EN-TQ-201	Systematic Approach to Training Process	20
EN-TQ-212	Conduct of Training and Qualification	13
EN-TQ-202	Simulator Configuration Control	9
14-S-02-20	Preparing, Conducting and Review of Simulator Evaluations	10
14-S-02-21	Preparers Guide for Simulator Evaluation Scenarios	8
14-S-02-20	Preparing, Conducting, and Review of Simulator Evaluations	10

Other Documents

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
	2015 Cycle 12 Licensed Operator Requal Simulator Training Plan Simulator Differences	0
	Control Room Walkdown: Modifications Needed to Be Made to the TREX Load	May 25, 2015
	2015 July Red Team Drill	
	GGNS Pre-NRC 71111.11 Self-Assessment	June 19, 2015
	Simulator Configuration Review Board Quarterly Meeting	February 24, 2015
	Simulator Configuration Review Board Quarterly Meeting	May 8, 2014
	Simulator Configuration Review Board Meeting	June 29, 2015
GGNS-TT-02	Simultaneous Trip of All Feedwater Pumps Transient Test B2.2.1(2)	April 20, 2015
GGNS-TT-05	Single Recirculation Pump Trip Transient Test B2.2.1(5)	April 22, 2015

Other Documents

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
GGNS-TT-03	Simultaneous Closure of all Main Steam Isolation Valves Transient Test B2.2.1(3)	April 21, 2015
GGNS-SST-02	Simulator Steady State Test 42% Core Thermal Power	April 25, 2014
GGNS-TT-02	Simultaneous Trip of All Feedwater Pumps Transient Test B2.2.1(2)	March 4, 2014
GGNS-TT-03	Simultaneous Closure of All Main Steam Isolation Valves Transient Test B2.2.1(3)	March 4, 2014
GGNS-TT-05	Single Recirculation Pump Trip Transient Test B2.2.1(5)	March 5, 2014
	Background for Changing Simulator Baseline Data Cycle 20 Core Reload	March 4, 2014
	Control Rod Movement Core Test	March 3, 2015
STNA-012	Simulator Training Needs Assessment	July 30, 2015
STNA-040	Simulator Training Needs Assessment	July 30, 2015
STNA-063	Simulator Training Needs Assessment	July 30, 2015
EC 50320	Connect PRNMS Power Signal to Replace Turbine First Stage Pressure Signal	0
	Scenario Based Testing – 2014 NRC Scenario 1	October 29, 2014
	Scenario Based Testing – GSMS-LOR-AEX12 Rev. 11	July 17, 2015
EC 53539	Change INFI 90 Setpoint Setdown Setpoint	0
	2014 and 2015 Requalification Examination Materials (Scenarios and Job Performance Measures)	

Condition Reports (CRs)

CR-GGN-1-2015-03854 CR-GGN-1-2015-04151 CR-GGN-2015-04622
CR-GGN-2015-04262

Simulator Discrepancy Reports

14-0088	14-0084	14-0020	13-0166	13-0150
12-0225	15-0095	15-0089	13-0105	12-0630
12-0287	15-0006			

Remediation Packages

2-11-26-2014	1-08-13-2014	2-10-15-2014	1-06-18-2015	1-04-16-2015
1-07-31-2014	1-11-26-2014	1-12-04-2014		

1R12 Maintenance Effectiveness (71111.12)

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
EN-DC-204	Maintenance Rule Scope and Basis	3
EN-DC-205	Maintenance Rule Monitoring	5
EN-DC-206	Maintenance Rule (a)(1) Process	3
EN-DC-207	Maintenance Rule Periodic Assessment	3

Other Documents

<u>Number</u>	<u>Title</u>	<u>Date</u>
M41	Containment Cooling System	July 7, 2013

Condition Report (CR)

CR-GGN-1-2015-04310

Section 1R13: Maintenance Risk Assessments and Emergent Work Control

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
01-S-18-6	Risk Assessment of Maintenance Activities	15
OPG-047	Protected Equipment Postings Strategy	7

Other Documents

<u>Number</u>	<u>Title</u>	<u>Date</u>
	GGNS EOOS Risk Monitor Users' Guide	October 24, 2013

Other Documents

<u>Number</u>	<u>Title</u>	<u>Date</u>
	Operator's Risk Report	
	Control Room Logs	June 28, 2015

Section 1R15: Operability Determinations and Functionality Assessments

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
05-1-02-V-9	Loss of Instrument Air	44
04-S-03-P81-1	HPCS Diesel Generator Prelube	27

Other Documents

<u>Number</u>	<u>Title</u>	<u>Date</u>
	Variable Inlet Vanes – VIV's	
	GGNS Operations Logs – Days	August 11, 2015
	GGNS Operations Logs – Nights	August 11, 2015

Condition Reports (CRs)

CR-GGN-1-2015-04781	CR-GGN-1-2015-04584	CR-GGN-1-2015-04574
CR-GGN-1-2015-05424		

Work Order (WO)

52624855 01

Section 1R19: Post-Maintenance Testing

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
EN-LI-118	Attachment 9.8 Equipment Apparent Cause Evaluation	21
04-1-01-P81-1	High Pressure Core Spray Diesel Generator	74
06-OP-1P81-M-0002	HPCS Diesel Generator 13 Functional Test	129

Other Document

<u>Number</u>	<u>Title</u>	<u>Date</u>
	GGNS Operations Logs – Days	July 13 – 15, 2015

Condition Reports (CRs)

CR-GGN-1-2015-04726	CR-GGN-1-2015-03999
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Work Orders (WOs)

52489084 01	52494850 01	00419764 01	00419764 02	52643844 01
00424447 01	00424472 01	00424467 01	00424475 01	00424470 01
00423505 01				

Section 1R22: Surveillance Testing

Procedure

<u>Number</u>	<u>Title</u>	<u>Revision</u>
06-OP-1P75-R-0003	SDG 11, Functional Test – Test No. 1 – 24-Hour Load Test/Hot Restart Test	124

Condition Report (CR)

CR-GGN-1-2015-04716

Section 1EP6: Drill Evaluation

Other Documents

<u>Number</u>	<u>Title</u>	<u>Revision</u> <u>Date</u>
	GGNS Emergency Drill Scenario, 2015 July Red Team	August 22, 2015
	GGNS July 2015 Drill – Red Team – Performance Indicators	0

Section 4OA1: Performance Indicator Verification

Other Documents

<u>Number</u>	<u>Title</u>	<u>Date</u>
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: High Pressure Injection	3 rd Quarter 2014
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Heat Removal	3 rd Quarter 2014

Other Documents

<u>Number</u>	<u>Title</u>	<u>Date</u>
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Residual Heat Removal	3 rd Quarter 2014
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: High Pressure Injection	4 th Quarter 2014
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Heat Removal	4 th Quarter 2014
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Residual Heat Removal	4 th Quarter 2014
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: High Pressure Injection	1 st Quarter 2015
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Heat Removal	1 st Quarter 2015
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Residual Heat Removal	1 st Quarter 2015
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: High Pressure Injection	2 nd Quarter 2015
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Heat Removal	2 nd Quarter 2015
Attachment 9.2	NRC Performance Indicator Technique/Data Sheet: Residual Heat Removal	2 nd Quarter 2015

Section 40A2: Problem Identification and Resolution

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
GGNS-MS-37	Mechanical Standard for the Division I and II Standby Diesel Generator Maintenance	6
07-S-24-P75-E001AB-29	Fuel Rack and Manifold Butterfly Valve Maintenance	4
07-S-24-P75-E001AB-29	Fuel Rack and Manifold Butterfly Valve Maintenance	5
07-S-24-P75-E001AB-29	Fuel Rack and Manifold Butterfly Valve Maintenance	6
EN-MA-118	Foreign Material Exclusion	10
07-S-24-P75-E001AB-22	Inspection of Fuel Oil System Tubing	3

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
06-OP-1T48-R-0002, Attachment II	Standby Gas Treatment A Logic and Vacuum Test: Vacuum Test (1A319A Open), August 1, 2015	115
06-OP-1T48-R-0002, Attachment II	Standby Gas Treatment A Logic and Vacuum Test: Vacuum Test (1A319A Open), August 9, 2015	115

Drawings

<u>Number</u>	<u>Title</u>
02-371-2686	Fuel Pump Linkage Assembly
02-371-04	Fuel Pump Linkage Diesel 4-Valve Head
02-371-3842	Bearing Assembly Fuel Pump Control

Other Documents

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
GNRO-2015/00044	Report Pursuant to 10 CFR 71.95 (a)(3) and (b) of two potential instances of noncompliance with Certificate of Compliance No. 9168/B(U)-96 for the 8-120B/002-S Cask	July 27, 2015
9168	Certificate of Compliance for Radioactive Materials Packages	20
GNRO-2013/00077	10 CFR 71.95 Report on Issues Involving Radwaste Cask 8-120B	September 27, 2013
TR-TP-002	Air Leak Test for Model 8-120B Cask Certificate of Compliance 9168	23
	GG UFSAR 6.2-66 – 6.2-76	0
	GG Technical Specifications 3.6-42 – 3.6-87a	
Attachment 9.8	Equipment Apparent Cause Evaluation CR-GGN-2015-03741	1
50.59 Review Form	Document Reviewed: 02-S-01-35, Rev. 24	April 28, 2005
00011421	Work Request Package	September 10, 2004
NRC Regulatory Guide 1.33	Quality Assurance Program Requirements	2

Other Documents

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
	GGNS Operations Logs, Nights	August 2, 2015
PTS-13-0083	Suite Action Tracking	

Condition Reports (CRs)

CR-GGN-1-2015-03869	CR-GGN-1-2015-0518	CR-GGN-1-2015-04573
CR-GGN-1-2015-04454	CR-GGN-1-2015-04465	CR-GGN-1-2015-04466
CR-GGN-1-2015-04436	CR-GGN-1-2015-04423	CR-GGN-1-2015-04426
CR-GGN-2015-04423	CR-GGN-2015-03741	CR-GGN-1-2015-04467
CR-GGN-1-2015-04453	CR-GGN-1-2015-04468	CR-GGN-2000-00588
1-2015-03829		

Work Order (WO)

00412720 01