



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

May 27, 2016

Mr. Mark E. Reddemann
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION – DESIGN BASES INSPECTION
(PROGRAMS) (INSPECTION REPORT 05000397/2016008)

Dear Mr. Reddemann:

On May 12, 2016, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Columbia Generating Station. The NRC inspectors discussed the results of this inspection with you and other members of your staff. The inspectors documented the results of this inspection in the enclosed inspection report.

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* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "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's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents 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/

Thomas R. Farnholtz, Chief
Engineering Branch 1
Division of Reactor Safety

Docket No. 50-397
License No. NPF-21

Enclosure:
Inspection Report 05000397/2016008
w/Attachment: Supplemental Information

cc: Electronic Distribution for Columbia Generating Station

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Distribution:
See next page

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DATE	5/26/16	5/26/16	5/26/16	5/27/16	5/27/16	5/27/16

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Letter to M Reddemann from Thomas R. Farnholtz, dated May 27, 2016

SUBJECT: COLUMBIA GENERATING STATION – DESIGN BASES INSPECTION
(PROGRAMS) (INSPECTION REPORT 05000397/2016008)

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 05000397
License: NPF-21
Report: 05000397/2016008
Licensee: Energy Northwest
Facility: Columbia Generating Station
Location: North Power Plant Loop
Richland, WA 99354
Dates: May 9 through May 12, 2016
Inspectors: R. Kopriva, Senior Reactor Inspector, Team Lead
J. Braisted, PhD, Reactor Inspector
N. Okonkwo, Reactor Inspector

Approved By: Thomas R. Farnholtz
Chief, Engineering Branch 1
Division of Reactor Safety

Enclosure

SUMMARY

IR 05000397/2016008, 05/09/2016 – 05/12/2016; Columbia Generating Station; Baseline Inspection, NRC Inspection Procedure 71111.21N, “Design Bases Inspection (Programs).”

The inspection activities described in this report were performed between May 9, 2016, and May 12, 2016, by three inspectors from the NRC’s Region IV office. 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

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R21 Component Design Basis Inspection (71111.21)

a. Inspection Scope

The inspection team performed a pilot inspection conducted as outlined in NRC Inspection Procedure (IP) 71111.21N, Attachment 1, "Environmental Qualification under 10 CFR 50.49, Programs, Processes, and Procedures." The team assessed Columbia Generating Station's implementation of the environmental qualification program as required by 10 CFR 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants." The team evaluated whether Columbia Generating Station staff properly maintained the environmental qualification of electrical equipment important to safety throughout plant life, established and maintained required environmental qualification documentation records, and implemented an effective corrective action program to identify and correct environmental qualification-related deficiencies.

The inspection included review of environmental qualification program procedures, component environmental qualification files, environmental qualification test records, equipment maintenance and operating history, maintenance and operating procedures, vendor documents, design documents, and calculations. The team interviewed program owners, engineers, maintenance staff, and warehouse staff. The team performed in-plant walkdowns (where accessible) to verify equipment was installed as described in Columbia Generating Station's environmental qualification component documentation files and that the components were installed in their tested configuration. Additionally, the team performed in-plant walkdowns to determine whether equipment surrounding the components could fail in a manner that could prevent the safety functions of the components and to verify that components located in areas susceptible to a high energy line break were properly evaluated for operation in a harsh environment. The team reviewed and inspected the storage of replacement parts and associated procurement records to verify environmental qualification parts approved for installation in the plant were properly identified and controlled, and that storage and environmental conditions did not adversely affect the components' qualified lives. Documents reviewed for this inspection are listed in the attachment.

The inspection procedure requires the team to select 6 to 10 components to assess the adequacy of the environmental qualification program. The team selected 9 components for this inspection. Component samples selected for this inspection are listed below:

- CEP-SPV-1A, Containment Exhaust Purge Solenoid Pilot Valve CEP-SPV-1A.

- E-CONN X102A, SOLISTRAND #34130 Parallel Splice Connectors, for Thermocouple and RTD Penetrations. Off of Mid-Plane in Drywell, Within Primary Containment.
- HPCS-MO-1, Motor Operator for the High Pressure Core Spray Motor Operated Valve 1.
- HPCS-FIS-6, High Pressure Core Spray Discharge Header Minimum Flow Indicator Switch for High Pressure Core Spray Pump HPCS-P-1.
- HPCS-M-P/1, 3000HP/373A Drive Motor for High Pressure Core Spray Pump HPCS-P-1.
- LD-TE-4A, Reactor Core Isolation Cooling Equipment Area Leak Detection Temperature Element.
- RCIC-DPIS-13A, Reactor Core Isolation Cooling Steam Supply High Flow Indicator Switch.
- RCIC-M-V/13, Reactor Core Isolation Cooling Injection Valve Motor for the Valve Operator.
- RCIC-PS-9A, Reactor Core Isolation Cooling Exhaust Pressure High Trip Switch.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

40A2 Problem Identification and Resolution

a. Inspection Scope

The team reviewed a sample of issues which were previously identified and entered into the corrective action program. The team reviewed these issues to verify an appropriate threshold for identifying issues and to evaluate the effectiveness of corrective actions. In addition, condition reports written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problem into the corrective action program. The specific condition reports that were sampled and reviewed by the team are listed in the attachment.

b. Findings

No findings were identified.

40A6 Meetings, Including Exit

Exit Meeting Summary

On May 12, 2016, the inspectors presented the final inspection results to Mr. M. Reddemann, Chief Executive Officer, 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. Abney, Manager, Operations
V. Bhardwaj, Manager, Planning/Scheduling/Outage
A. Black, General Manager, Emergency Services
D. Brandon, Plant Support Engineering Manager, Engineering
D. Brown, Manager, System Engineering
A. Eley, EQ Program Owner, Technical Services Engineering
E. Gilmour, Manager, Computer Engineering
K. Gosney, Manager, Security Operations
D. Gregoire, Manager, Regulatory Affairs and Performance Improvement
R. Hammons, Manager, Employee Concerns Program
W. Jaleel, Engineer, Technical Services Engineering
A. Javorik, Vice President, Engineering
D. Kettering, Manager, Design Engineering
R. Meyers, Manager, Operations Training
C. Moon, Manager, Quality
T. Parmelee, Compliance Engineer, Regulatory Affairs
J. Pierce, Recovery Manager, Vice President-Operations
M. Reddemann, Chief Executive Officer
G. Silvan, NSSS Engineer, System Engineering
D. Scott, Engineer, Design Engineering
B. Strecker, Information Services/Telecom
J. Trautvetter, Manager, Maintenance Services
D. Wolfgramm, Compliance Supervisor, Regulatory Affairs
R. Wolfgramm, Supervisor, Technical Services Engineering
J. Zielinski, Engineer, Technical Services Engineering

NRC Personnel

G. Kolcum, Senior Resident Inspector
D. Bradley, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Open and Closed

None

LIST OF DOCUMENTS REVIEWED

Calculations

<u>Number</u>	<u>Title</u>	<u>Revision</u>
TM-2019	Summary of Equipment Qualification Environmental Profiles	12
EQ-02-86-01	Calculation for Scheduled Maintenance Interval Flexibility Based on Conservative Assumptions Previously Used in Establishing Qualified Life	1

Drawings

<u>Number</u>	<u>Title</u>	<u>Revision</u>
624	WPPSS Primary Containment Vessel Penetration PX 102 thru PX 105	E3
992C349BC	Outline (Induction Motor)	12
CRC-628-1817M554	From Hydrogen Recombiner Skid CAC-HI-1A to Penetration X-102 and X-98	14
D114	WPPSS Primary Containment Vessel Penetration X102 thru X105	E7
D-220-031.1	Tube Erection and Support Isometric IR67 R.B. EL 548'-0"	6
E-2698	Modular Design Penet. Type 1 through 5 & 7	0
E-2722	Canister Cable Support	A
E-2735	Outboard Enclosure Box, Penet. Type 1, 3	4
E-2736	Inboard Enclosure Box, Penet. Type 1, 3	5
E507-4	Main Three Line Diagram E-SM-4 HPCS Bus	27
E536-2K	Connection Wiring Diagram, Terminal Boxes & Misc. Devices	22
E-539, Sh. 42	Connection Wiring Diagram Reactor Instrumentation & Control Sheet No. 42	24
E-539, Sh. 43	Connection Wiring Diagram Reactor Instrumentation & Control Sheet No. 43	22

Drawings

<u>Number</u>	<u>Title</u>	<u>Revision</u>
E-539-1	Connection Wiring Diagram Reactor Instrumentation & Control Sheet No. 1	15
E694	Instrument and Control Conduit & Tray Plan	15
EWD-3E-148	Electrical Wiring Diagram, Reactor Recirculation System, Adjustable Speed Drive Loop A and B RTD Inputs	1
EWD-46E-233	Electrical Wiring Diagram, AC Electrical Distribution System Power Panel E-PP-4A	18
EWD-7E-022	Electrical Wiring diagram, High pressure Core Spray System Pump, HPCS-P-1 (E22-C001) Breaker HPCS-CB-P1	20
EWD-7E-023	Electrical Wiring diagram, High pressure Core Spray System Pump, HPCS-P-1 (E22-C001) Breaker HPCS-CB-P1	22
EWD-7E-025B	Electrical Wiring diagram, High pressure Core Spray System, Initiation and Trip Logic	1
EWD-7E-025D	Electrical Wiring diagram, High pressure Core Spray System, Initiation and Trip Logic	0
EWD-7E-025F	Electrical Wiring diagram, High pressure Core Spray System, Initiation and Trip Logic	2
EWD-7E-028	Electrical Wiring diagram, High pressure Core Spray System Pump, HPCS Bus, Relay and metering	14
M 568	General Arrangement Plan EI 471'-0" and EL. 501'-0", Reactor Building	50
M519	Flow Diagram Reactor Core Isolation Cooling System	98
M520	Flow diagram, HPCS and LPCS systems, Reactor Building	103
M543-3	Flow Diagram Reactor Building Primary Containment Cooling And Purging System	4
M695	Main and Aux. Steam, SV Vent, and Misc. Drain Piping	32
M711	RFW, RCIC, HPCS, SW, RWCU, RRC and TSW Reactor Building EL 422'-3"	35

Drawings

<u>Number</u>	<u>Title</u>	<u>Revision</u>
M712	RFW, RCIC, HPSC, SW, RWCU, RRC and TSW Reactor Bldg. EL. 441'-0"	46
M806	HVAC Plan and Sections at EL 471'-0"	33
M937	Qualification Scheduled Maintenance List for Safety-Related Equipment	41
M944	Special Maintenance Practices Based on Equipment Qualification	39
P2-3311-N-4	6" Bolted Bonnet Gate Valve	0

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
1.19.3	Component Condition Monitoring Program	4
1.5.13	Preventive Maintenance Optimization Living Program	34
10.1.21	Maintenance of Environmentally Qualified Equipment	11
10.25.19	Termination and Splicing Instruction	26
10.25.4	Lubrication and Inspection of Limitorque MOV(s)	27
5.5.5	Overriding RCIC Low RPV Pressure Isolation and High Exhaust Pressure Isolation	7
DES-2-1	Plant Design Changes	55
DES-2-18	Replacement Item Equivalency	7
DES-4-7	Classification of Systems, Structures, and Components	12
DES-5-3	Safety Classification Determination	3
EQES-12	Engineering Standard for Special Maintenance Practices on EQ Database Page: 1 of 9 Management Standard for Drawings M944	4

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
EQES-2	Technical Requirements for Electrical Equipment Environmental Qualification	14
EQES-2	Technical Requirements for Electrical Equipment Environmental Qualification	14
MI-1.22A	Maintenance Planner's Guide	6
MOT-Motor-1-3	EQ Requirements	7
PPM 10.1.21	Maintenance of Environmentally Qualified Equipment	11
SCSI-3.6 Use	Shelf Life Control and Preventive Maintenance of Warehoused Material	3
SPES-1.6.2	Spare Parts Engineering Standard	48
SPES-1.6.4	SAFETY FUNCTION / QUALITY CLASSIFICATION	44
SPES-1.6.5	Commercial Grade Dedication	47
SPES-1.6.8	Vendor Inspection Plans	44
SPES-1.7.11	EQ Testing/Inspection	May 8, 2006
SPES-1.7.13	Required Test And Inspections By Vendor	44
SPES-1.7.18	Storage Maintenance	46
SPES-1.7.19	Shelf Life	May 8, 2006
SPES-1.7.57	Post-Maintenance Testing	May 8, 2006
SPES-1.7.87	Columbia Generating Station Design Specification	44
SWP-DES-02	Q-list Control/Classifications of Structures, Systems and Component	01
SWP-MMP-02	Warehousing	11
SWP-PUR-04	Material, Equipment, Parts and Supplies Procurement	15

Audits and Self-Assessments

<u>Number</u>	<u>Title</u>	<u>Date</u>
AR-SA 195397	Equipment Qualification Program Environmental QID Files Self-Assessment	January 18, 2011
AR-SA 297748	Equipment Qualification - Seismic and Environmental	March 15, 2014
AR-SA 335435	Component Design Basis Inspection (CDBI) and Equipment Qualification (EQ) Program Inspection	September 29, 2015
AU-EN-16	Quality Services Audit Report – Engineering Program	February 25, 2016

Miscellaneous

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
	Operations Training Systems Study Guide	4
	Limatorque Maintenance Update 92-1	
15608	Motor, Induction, Medium Voltage, High Pressure Core Spray, Safety Related.	1
9A-CR3-580A-39	Justification for Use of Inconel 625 Bellows in Model 224 DPU-Based Products	December 3, 2008
CER NO. C93-0246	Component Classification Evaluation Record	1
CER NO. C93-0247	Component Classification Evaluation Record	2
CER NO. C93-0250	Component Classification Evaluation Record	1
Division 300 Section 210	Design Basis Document: Environmental Qualification	4
EV-556	Procurement Engineering Evaluation	16
GLH-85-011	Barksdale Pressure Switch Qualification Audit	March 28, 1985
IEEE Std. 323-1974	IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations	1974

Miscellaneous

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
IEEE Std. 334-1994	IEEE Standard for Qualifying continuous Duty Class 1E Motors for Nuclear Power Generating Station	June 9, 1994
PSA-1-SM-0001	Probabilistic Safety Assessment - CGS PSA Internal Event Summary	6
R3-288-1	IEE 344-1975 Seismic and Radiation Qualification Tests for ITT Barton Differential Pressure Indicating Switches, Models 288A and 289A	1
Section 315	Reactor Core Isolation Cooling System Design Bases Document	9
SER	Design Criteria For Structures, Systems, And Components, Section 3	
SSER 3	Design Criteria For Structures, Systems, And Components Section 3.5 - 3.11 and Appendix 3D: Safety-Related Systems In The Environmental Qualification Program	
SSER 4	Design Criteria For Structures, Systems, And Components Section 3.5 - 3.11	
SSER 5	Design Criteria For Structures, Systems, And Components Section 3.9 - 3.11	
WPC875-84-58	Contract C-0875, WRO 85-05, Buna-N Elastomer Qualified Age Life in Safety-Related C1E Equipment	August 31, 1984

Environmental Qualification Test Reports

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
22A3008	BWR Equipment Environmental Interface Data	6
22A4722	ECCS Motor Qualification Program	0
600376A	BWR Containment Qualification - Nuclear Power Station Qualification Type Test Report Limitorque Valve Actuators for BWR Service	August 30, 1972
AQR-67368	Test Report On Qualification Of Automatic Switch Co. (ASCO) Catalog NP-1 Solenoid Valves For Safety-Related Applications In Nuclear Power Generating Stations	1

Environmental Qualification Test Reports

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
B0003	Qualification Type Test Report, Limitorque Valve Actuators for Class 1E Service, Outside Primary Containment	January 23, 1975
B0058	Limitorque Valve Actuator Qualification For Nuclear Power Station Service, Tests Conducted Per IEEE 382-1972, 323-1974, 344-1975	January 11, 1980
B0119	Qualification Type Test Report Of Multi-Point Terminal Strips For Use In Limitorque Valve Actuators For PWR Service	April 28, 1982
B0212	Nuclear Power Station Qualification Type Test Report Limitorque Valve Actuators With Type LR Motor For Westinghouse PWR.	November 30, 1984
B0373	Limitorque Environmental Qualification Report for SMB-000 "C Style" Torque Switch	August 22, 2014
DD213A8812CK	Motor Vertical (3000 HP)	0
ELR 221-11	Qualification Retention Test of A-MP* SOLISTRAND* Terminals per MIL-T-7928F: Type 1, Class 2	May 24, 1970
NEDM-10672	Environmental Qualification Test for Vertical Induction Motor for ECCS Service on Nuclear Power Plants	August 1992

Qualification Information Documents

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
049005EL	Environmental Qualification Tyco/Raychem Heat Shrink Tubing, Tape, & Splice Kits (LV/reformulated compounds)	1
049006EL	Environmental Qualification Amp SOLISTRAND Parallel Splice Connector	1
049006EL-01	Environmental Qualification, Subject: Amp SOLISTRAND Parallel Splice Connector	1
049007EL	Environmental Qualification Raychem Heat Shrink Tubing, Tape, and Splice Kits (LV, Original Compound)	1

Qualification Information Documents

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
086001EL	Environmental Qualification ITT Barton Differential Pressure Indicating Switches	2
086001EL-01	ITT Barton Differential Pressure Indicating Switches	2
21001EL-01C	Limatorque Valve Operators with DC Motors (Insulation Classes RH and H)	3
21001EL-01D	Fiberite Limit Switch and Torque Switch for Limatorque Valve Operators	2
213032EL	Environmental Qualification General Electric ECCS Pump Motors	3
221001EL-01B	Environmental Qualification, Subject: Limatorque Valve Operators with AC Motors (Insulation Classes H and B)	2
221001EL-01D	Environmental Qualification, Subject: Fiberite Limit Switch and Torque Switch for Limatorque Valve Operators	2
221001EL-01E	Environmental Qualification, Subject: Terminal Blocks for Limatorque Valve Operators.	1
256002EL-01	Barksdale Pressure Switches, Models B1T and P1H	1
315006EL	Environmental Qualification, Subject: ASCO Solenoid Pilot Valves (N P8316 Series)	03A
339004-01	PYCO Temperature Element	17
800030	QID Work Sheet	0
W01981	Extend PMQR 7506-05 on HPCS-M-P/1 from 5 to 10 years	January 7, 2013

Vendor Manuals

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
15808	Specification for Motor, Induction, medium voltage, High pressure core spray, Safety related	1
531-00,1,1	Differential Pressure Indicating Switches, Unit, Calibration And Parts List	3

Vendor Manuals

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
999-00,12,1	Limiter Valve Control and Hazardous Brake	4
999-00,86	ASCO Solenoid Valve Catalogs	2
NEDO-32937 (02E-12-12,8)	Custom 8000 Vertical Indication Motor Weather Protected Type 1 Solid and Hollow Shaft	December 19, 2006

Action Requests

00246503	00275750	00333165	00348164	00349369
00248580	00287143	00338239	00348494	00349388
00255999	00302169	00343392	00348583	00349392
00270927	00323762	00343393	00349304	00349412
00270931	00324946	00346992	00349348	

Action Requests Generated During Inspection

346992	349164	349369	349392	349424
348494	349304	349388	349412	349457
348583	349348			

Work Orders

A64692	AR6810	02011451	02045314	02048837 01
AP3457	02008915 01			