



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
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June 7, 2016

Mr. Joel Gebbie
Senior VP and Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

SUBJECT: DONALD. C. COOK NUCLEAR POWER PLANT, UNITS 1 AND 2 - NRC
PILOT DESIGN BASES INSPECTION (PROGRAMS) INSPECTION
REPORT 05000315/2016008; 05000316/2016008

Dear Mr. Gebbie:

On May 13, 2016, the U.S. Nuclear Regulatory Commission (NRC) completed the program portion of the pilot Design Bases Inspection at your Donald C. Cook Nuclear Power Plant, Units 1 and 2. The enclosed report documents the results of this inspection, which were discussed on May 13, 2016, with yourself, and other members of your staff.

Based on the results of this inspection, the NRC inspectors did not identify any findings or violations of more than minor significance. However, inspectors documented a licensee-identified violation which was determined to be of very-low safety significance in Section 4OA7 of this report. The NRC is treating this violation as Non-Cited Violation consistent with Section 2.3.2.a of the Enforcement Policy.

If you contest the subject or severity of the Non-Cited-Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Donald C. Cook Nuclear Power Plant, Units 1 and 2.

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 "Rules of Practice," a copy of this letter 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

J. Gebbie

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Sincerely,

/RA/

Mark T. Jeffers, Chief
Engineering Branch 2
Division of Reactor Safety

Docket Nos. 50-315; 50-316
License Nos. DPR-58; DPR-74

Enclosure:
IR 05000315/2016008; 05000316/2016008

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-315; 50-316
License No: DPR-58; DPR-74

Report No: 05000315/2016008; 05000316/2016008

Licensee: Indiana Michigan Power Company

Facility: Donald C. Cook Nuclear Power Plant, Units 1 and 2

Location: Bridgman, MI

Dates: May 9 - 13, 2016

Inspectors: A. Dunlop, Senior Reactor Inspector, Lead
B. Jose, Senior Reactor Inspector
G. Hausman, Senior Reactor Inspector

Observers: J. Isom, Senior Reactor Operations Engineer, NRR

Approved by: M. Jeffers, Chief
Engineering Branch 2
Division of Reactor Safety

Enclosure

SUMMARY

Inspection Report 05000315/2016008; 05000316/2016008, 05/09/2016 – 05/13/2016;
Donald C. Cook Nuclear Power Plant, Units 1 and 2; Pilot Design Bases Inspection (Programs).

The inspection was a 1-week onsite baseline inspection that focused on the implementation of the Environmental Qualification Program. The inspection was conducted by three regional engineering inspectors. No findings were identified by the inspectors. All violations of U.S. Nuclear Regulatory Commission (NRC) requirements are dispositioned in accordance with the NRC's Enforcement Policy, dated February 4, 2015. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5, dated February 2014.

NRC-Identified and Self-Revealed Findings

No findings were identified.

Licensee-Identified Violations

A violation of very-low safety significance that was identified by the licensee has been reviewed by the NRC. Corrective actions taken or planned by the licensee have been entered into the licensee's Corrective Action Program. This violation and Corrective Action Program tracking number is listed in Section 4OA7 of this report.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Mitigating Systems and Barrier Integrity

1R21 Design Bases Inspection (Programs) (71111.21N)

.1 Introduction

This is a pilot inspection of a licensee program conducted per U.S. Nuclear Regulatory Commission (NRC) Inspection Procedure (IP) 71111.21N. The objective of the Design Bases Inspection (DBI) is to gain reasonable assurance that structures, systems, and components can adequately perform their design basis function. This includes reasonable assurance that electrical equipment important-to-safety for which a qualified life has been established can perform its safety functions without experiencing common cause failures before, during, and after applicable design basis events. This inspection will review the licensee's implementation of the electrical equipment Environmental Qualification (EQ) Program, as required by their license, for maintaining the qualified status of equipment during the life of the plant. The inspection is intended to assess the program's effectiveness by sampling a limited number of components. This inspectable area verifies aspects of the Mitigating Systems and Barrier Integrity cornerstones for which there are no indicators to measure performance.

The inspectors assessed the implementation of the EQ Program, established to meet the requirements of Title 10, *Code of Federal Regulations* (CFR), Part 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants." The scope of this rule included safety-related equipment relied upon to remain functional during and following design basis events, nonsafety-related equipment whose failure under postulated environmental conditions could prevent safety-related equipment from performing design functions, and certain post-accident monitoring equipment. The NRC originally verified plant's EQ Program implementation through a series of onsite inspections from 1984 – 1989. The EQ Program at that time established measures to ensure components met the EQ rule through the 40-year operating license period. Since that time, both units have renewed their operating licenses for an additional 20 years, and in 2014 Unit 1 entered its period of extended operation.

Specific documents reviewed during the inspection are listed in the Attachment to the report.

.2 Inspection Sample Selection Process

The inspectors selected components for review using information provided by the licensee. This included risk informing the selection based on the Donald C. Cook Nuclear Power Plant probabilistic risk assessment by generally selecting components that had a high Fussell Vesely Importance factor. Additional selection criteria included discussions with plant staff, reviewing procurement, maintenance, and design records, and walking down plant areas susceptible to high energy line breaks. Based on these reviews, the inspectors focused the inspection on EQ Program elements and components repaired, modified, or replaced. Components from each unit were selected and included motor-operated valves, air operated valves (AOVs), electrical containment penetrations, and transmitters (pressure, flow, and level) located both inside and outside

of containment. For each component selected, the inspectors evaluated the environmental qualifications of supporting sub-components including seals, lubricants, connectors, control and power cables, solenoids, transducers, limit switches, and terminal blocks.

This inspection constituted seven samples as defined in IP 71111.21N, Attachment 1, Section 02.01. The pilot program DBI, in conjunction with the team portion of the DBI (IP 71111.21M), constitutes completion of the baseline triennial Component Design Bases Inspection (IP 71111.21).

.3 Component Design

a. Inspection Scope

The inspectors assessed the licensee's implementation of the EQ Program as required by 10 CFR 50.49. The inspectors evaluated whether the licensee staff properly maintained the EQ of electrical equipment important to safety through plant life (repair, replacement, modification, and plant life extension), established and maintained required EQ documentation records, and implemented an effective Corrective Action Program (CAP) to identify and correct EQ-related deficiencies and evaluate EQ-related industry operating experience.

This inspection effort included a review of EQ Program-related procedures, component EQ files, EQ test records, equipment maintenance and operating history, maintenance and operating procedures, vendor documents, design documents, and calculations. Additionally, the inspectors performed in-plant walkdowns of accessible components to verify installed equipment was the same as described in the EQ component documentation files, verify components were installed in their tested configuration, determine whether equipment surrounding the EQ component may fail in a manner that could prevent the EQ component from performing its safety function, and verify that components located in areas susceptible to a high-energy line break were properly evaluated for operation in a harsh environment. Components removed from the EQ Program were reviewed to ensure an adequate basis existed to no longer require the components to meet EQ requirements. The inspectors reviewed procurement records and inspected a sample of replacement parts stored in the warehouse to verify EQ parts approved for installation in the plant were properly identified and controlled; and that storage time and environmental conditions did not adversely affect the components' qualified life or service life. Documents reviewed for this inspection are listed in the Attachment. The following seven EQ components (samples) were reviewed:

- Containment Quadrant #3 Electrical Control Containment Penetration #4 (1-CEP-3C4); EQ sub-components: electrical penetration and flood up tubes;
- Pressurizer Relief Valve Upstream Shutoff Motor Operated Valve (1-NMO-151); EQ sub-components: actuator and motor
- Steam Generator # 2 Feedwater Regulating AOV (1-FRO-220); EQ sub-components: solenoid valve (1-XSO-294);
- Steam Generator # 4 Stop AOV (2-MRV-240); EQ sub-components: limit switches and solenoid valves (2-XSO-241 and 2-XSO-242);
- Pressurizer Safety Valve SV-45B Discharge Acoustic Monitor (2-QR-107B); nonsafety-related Regulatory Guide 1.97 instrument;

- Auxiliary Feedwater to Steam Generator OME-3-1 Flow Indicator Transmitter (1-FFI-210); Regulatory Guide 1.97 instrument; and
- Lower Containment Train 'B' Water Level Indicator Transmitter (1-NLI-320); Regulatory Guide 1.97 instrument.

b. Findings

No findings were identified.

.4 Operating Experience

a. Inspection Scope

The inspectors reviewed three EQ-related operating experience issues associated with the selected components to ensure that associated generic concerns had been adequately evaluated and addressed by the licensee. The operating experience issues listed below were reviewed as part of this inspection:

- NRC Information Notice 2014-04, "Potential for Teflon® Material Degradation in Containment Penetrations, Mechanical Seals";
- NRC Information Notice 2015-12, "Unaccounted for Error Terms Associated with the Irradiation Testing and Environmental Qualification of Important-to-Safety Components"; and
- OE9884, "Acoustic Monitoring System Accelerometer Connectors."

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems

.1 Review of Items Entered Into the Corrective Action Program

a. Inspection Scope

The inspectors reviewed a sample of the selected component problems identified by the licensee and entered into the CAP. The inspectors reviewed these issues to assess the licensee's threshold for identifying issues and the effectiveness of corrective actions related to design issues. In addition, corrective action documents written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problem into the CAP. The specific corrective action documents sampled and reviewed by the inspectors are listed in the attachment to this report.

b. Findings

No findings were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

On May 13, 2016, the inspectors presented the inspection results to Mr. J. Gebbie, and other members of the licensee staff. The licensee acknowledged the issues presented. Several documents reviewed by the inspectors were considered proprietary information and were either returned to the licensee or handled in accordance with NRC policy on proprietary information.

4OA7 Licensee-Identified Violations

The following violation of very-low significance (Green) was identified by the licensee and is a violation of NRC requirements which meets the criteria of the NRC Enforcement Policy for being dispositioned as a Non-Cited Violation.

- The licensee identified a finding of very low safety significance (Green) with an associated Non-Cited Violation of 10 CFR 50.49(d), “Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants,” for the licensee’s failure to keep EQ files current and to retain EQ files in an auditable form to permit verification that each item of electric equipment that is important to safety meets EQ requirements. Specifically, during the licensee’s Self-Assessment GT 2015-12352-4, “Environmental Qualification Program – 71111.21P Component Design Bases Inspection Engineering Programs,” dated May 6, 2016, the licensee identified that contrary to 10 CFR 50.49(d); an excessive number of Equipment Qualification Evaluation Reports had not been incorporated into Central Equipment Environmental Qualification Files; (2) the EQ Master List was controlled through a non-quality assurance database; and (3) the EQ Evaluation Tracking Log was not being maintained in accordance with Procedure 12-EHP-5025-EQE-002, “Performing EQ Evaluations,” Revision 6. In addition, the licensee stated in Action Request (AR) 2016-0841, “DCC-QA-105-QCN Has Several Unincorporated Changes Pending,” dated January 21, 2016, that the large backlog of pending changes made it difficult for plant personnel to identify appropriate EQ requirements for plant equipment. As a result, the licensee entered the self-assessment identified issues into their CAP as follows:
 - AR 2016-2844, “Excessive Number of EQERs not Incorporated into CEEQ Files,” dated March 11, 2016;
 - AR 2016-2950, “Some EQ Documents do not Meet PMP-2030-REC-001,” dated March 15, 2016; and
 - AR 2066-2842, “EQ Procedure Non-Compliance, 12-EHP-5052-EQE-002,” dated March 11, 2016.

The finding was determined to be more than minor because the finding was associated with the Mitigating Systems’ cornerstone attribute of Design Control and affected the cornerstone’s objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the licensee failed to maintain EQ files current and to retain the EQ files in an auditable form. The finding screened as Green utilizing Inspection Manual Chapter 0609, Appendix A, “The Significance

Determination Process for Findings At-Power,” Exhibit 2, for the Mitigating Systems’ cornerstone. Specifically, the finding was determined to be a documentation concern and no evidence was found during the assessment to suggest EQ components were not qualified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

J. Gebbie, Chief Nuclear Officer
S. Lies, Site Vice President
M. Lloyd, Vice President Engineering
K. Anderson, Engineering Programs Supervisor
D. Aubrey, Engineering Programs Manager
K. Baker, Design Engineering Manager
A. Garrett, Plant Engineering Director
S. Mitchell, Nuclear Regulatory Affairs Supervisor
S. Partin, Site Director
J. Petro, Design Engineering Director
J. Ross, Plant Manager
M. Scarpello, Nuclear Regulatory Affairs Manager
R. Wynegar, Nuclear Regulatory Affairs

U.S. Nuclear Regulatory Commission

M. Jeffers, Chief, Engineering Branch 2
T. Taylor, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access Management System
AOV	Air-Operated Valve
AR	Action Request
CAP	Corrective Action Program
CFR	<i>Code of Federal Regulations</i>
DBI	Design Bases Inspection
EQ	Equipment Qualifications
IP	Inspection Procedure
NCV	Non-Cited Violation
NRC	U.S. Nuclear Regulatory Commission
PARS	Publicly Available Records System

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

CORRECTIVE ACTION DOCUMENTS GENERATED DUE TO THE INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
AR 2016-5879	2 dpm Leak from 1-FFI-210-IL	05/10/16
AR 2016-5973	Vent Line for Valve 2-SV-1B-4 is not Concentric in Drip Pan	05/11/16
AR 2016-6028	Analytical Qualified Life of 2-XSO-503/505	05/12/16

CORRECTIVE ACTION DOCUMENTS REVIEWED DURING THE INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
AR 2012-2446	EQ PM for 1-XSO-297 Incorrectly Scoped Online	02/23/12
AR 2012-2545	10 CFR Part 21 Report - Rosemount Pressure Transmitters	02/24/12
AR 2013-1369	Rosemount Transmitters Need to be Returned for Refurbishment	01/30/13
AR 2015-4008	2-SV-2A-4 is Leaking by	03/25/15
AR 2015-5412	Conduit not sealed on 2-FMO-211-ACT	04/15/15
AR 2016-0841	DCC-QA-105-QCN has Several Unincorporated Changes Pending	01/21/16
AR 2016-2842	EQ Procedure Non Compliance, 12 EHP 5052 EQE 002	03/11/16
AR 2016-2844	Excessive Number of EQERs not Incorporated into CEEQ Files	03/11/16
AR 2016-2950	Some EQ Documents do not Meet PMP 2030 REC 001	03/15/16
GT 2014-0064 - 3	NRC IN 2014-04: Potential for Teflon Material Degradation in Containment Penetrations, Mechanical Seals and Other Components	03/31/14
GT 2014-0389-22	Part 21 Report - Improper Irradiation of Samples for Ball Valve Seats and Diaphragms	08/01/14
GT 2015-0173-18	Part 21 Report - Event Number 50681 for ASCO Solenoids	09/04/15
GT 2015-12352-4	Self-Assessment of Environmental Qualification Program	03/06/16
GT 2015-15217	Review NRC Information Notice 2015-12	11/24/15
GT 2015-16496-4	Part 21 Screening - EPRI Product Number 1000867	02/25/16

EQ FILES

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
1-2-EDS-334	Design Standard Number - Typical Mounting of Assembly for Acoustic Monitoring System	10
517-TR-03	Final Qualification Test Report for Environmental and Seismic Testing of the TEC Valve Flow Monitoring System	2
517-TR-10	Updated-Qualified-Life Study for the TEC 1414 Valve-Flow Monitoring System Components (Addendum to TEC Qualification Report 517-TR-03, Revision 2)	02/04/87

AQR-67368	Qualification Test Report for ASCO Model NP-1 Solenoid Valves	08/19/83
B0058	Limitorque Valve Actuator Qualification Test Report	01/11/80
CEEQ EQ-0060A	Material Test Report for Material used in Conax Electrical Penetration Assemblies and Electrical Conductor Seal Assemblies	D
CEEQ EQ-0557,	Environmental Qualification of ASCO Solenoid Valve, Series NP8316, NP8321, and NPEF8300 Installed at Cook	4
CEEQ EQ-0559	Central Equipment Environmental Qualification File: Limitorque Valve Motor Operators Installed at D. C. Cook	3
CEEQ EQ-0564	Central Equipment Environmental Qualification File: NAMCO Controls Limit Switches EA180 Series/EC210 Electrical Receptacle and Connector/Cable Assembly	2
CEEQ EQ-0598	Justification for Current Installed Configuration of Flood Up Tubes	3
CEEQ EQ-0620	Analytical Basis for Environmental Qualification of Equipment	0
CEEQ EQ-0703A	Environmental Qualification of Conax Electrical Penetrations (SCEW Sheets 1,2-EP01 AND 1,2-EP02)	0
EQ0043	Qualification Test Report for NAMCO EA180 Series Limit Switches	11/28/79
EQ-0587	Environmental Qualification of TEC Charge Converters for (1)2 QR 107A, B, C, and D Installed at DC Cook	2
EQ-0702	Environmental Qualification of Rosemount 1154 Series H Pressure Transmitters for use at DC Cook	0
EQ-0709	Environmental Qualification of Fluid Components (FCI)	0
EQER 2002-005	Reevaluate the Replacement Interval of the Helical Repaired Flood Up Tube Patch	03/28/02
EQER 2004-03	Determine the Replacement Frequency for 250 Vdc Normally Energized ASCO Solenoid Valves	08/27/04
EQER 2011-005	EQ Evaluation of Class 1E Equipment for License Renewal Installed at DC Cook Nuclear Plant, Units 1 and 2	12/27/11
SCEW 1-EP02	600V Containment Penetration	7

MISCELLANEOUS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
DCC-QA-105-QCN	1-CEP-3C4 SMR Requirements	14
DIT-B-00801-00	Bounding Equipment Qualification Radiation Doses	02/16/00
PS-1-97534-18	Control Penetration No. 1-3C4 Wiring Diagram	18
SCD-2-VRS-2100 and SS-SE-2002-0049-00	Safety Classification of Unit 1 and Unit 2 Normal Range Containment Radiation Monitors as Standard Commercial Grade (QAS)	0
B-00501-04	Design Information Transmittal (DIT) Time-Temperature Profiles for Plant Areas during Normal Conditions	03/31/04

MODIFICATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
1-DCP-4902	Containment Penetration Flood Up Tube Repair	0A

PROCEDURES

Number	Description or Title	Revision
12-EHP-5025-EQE-001	Preparation and Maintenance of Central Equipment Environmental Qualification (CEEQ) Files and SCEW Sheets	5
12-EHP-5025-EQE-002	Performing EQ Evaluations	6
12-EHP-5043-ERP-001	Engineering Review of Procurement Documents	18
12-EHP-5043-SLE-001	Shelf Life	9
12-MMP-3130-ISPM-001	In-Storage Preventive Maintenance	3
12-QHP-5050-NDE-006	Visual Examination: VT-1, EVT-1, AND VT-3	6
LRP-EAMP-01	License Renewal Program Basis Documents Evaluation of Aging Management Programs	4
PMI-5025	Environmental Qualification Program	10
PMP-2030-REC-001	Records Management	23
PMP-5025-EQE-001	Environmental Qualification of Electrical Equipment	5

VENDOR MANUALS

Number	Description or Title	Revision
VTD-ASCO-0027	ASCO Solenoid Installation Instructions	3
VTD-CONA-0013	Conax Buffalo Corp. Installation and Maintenance Manual for Electrical Penetration Assemblies	3
VTD-FLCM-0005	Fluid Components Intl Installation and Operation Manual for CL86 Containment Level Monitoring System	0
VTD-FLSC-0015	Flowserve Limitorque SMB/SB Series User Instructions	1
VTD-NAMC-0040	NAMCO Controls Installation Instructions for EC210 Series Receptacle and Connector Assemblies	1
VTD-NAMC-0046	NAMCO Controls EA180 Series Limit Switch Assembly Instructions	1
VTD-ROSE-0134	Rosemount Nuclear (Emerson Process Management) Product Manual for Model 1154 Series H Alphaline Nuclear Pressure Transmitter	BA
VTD-ROSE-0135	Rosemount Quick Disconnect (QDC) Nuclear Electrical Connector	0
VTD-TECC-0001	Technology for Energy Corporation Operation and Maintenance Manual for Model 1414-1-(5) Valve-Flow Monitoring System	0
VTD-TECC-0022	Technology for Energy Corporation Model 160-2 Transient Shield, Endevco Accelerometers, and Associated Cabling Installation Instructions (Standard)	J

WORK DOCUMENTS

Number	Description or Title	Date
WO 55230886	Replace ASCO Solenoid Valve 1-XSO-294	04/06/13
WO 55255087	Replace Control Solenoid 2-XSO-503	04/10/15
WO 55255364	Replace Control Solenoid 2-XSO-505	04/10/15
WO 55255365	Replace Control Solenoid 2-XSO-507	04/10/15
WO 55270905	Refurbish Actuator 2-MRV-241	02/13/10
WO 55271872	Replace 1-XSO-503 ASCO Solenoid Valve per DCC-QA-105-QCN	03/17/10
WO 55395037	Refurbish MOV Actuator 1-NMO-151	10/22/13
WO 55424258	Unit 1 Inspect Flood Up Tube	10/21/14
WO 55452503	VT-1 Exam of Flood Up Tubes End of Outage	04/22/16

J. Gebbie

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Sincerely,

/RA/

Mark T. Jeffers, Chief
Engineering Branch 2
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