May 25, 1988

Docket No. 50-410

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Mr. Charles V. Mangan
Senior Vice President
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Dear Mr. Mangan:

SUBJECT: WITHDRAWAL OF THE REQUEST FOR A SCHEDULAR EXEMPTION FROM 10 CFR 50.54 (TAC 67174)

By letter dated January 21, 1988, Niagara Mohawk requested a schedular exemption from the requirements of 10 CFR 50.54(c)(3)(i) regarding the requirements for an inerted containment. This exemption was requested to allow additional time to complete the preoperational testing of the inerting system while power ascension testing was being performed. On May 12, 1988 you submitted a request to withdraw the exemption request. The request for withdrawal stated that the 100% rated thermal power trip test has been completed and the Nine Mile Point Unit 2 containment is now inerted.

This letter acknowledges the withdrawal of your request for a schedular exemption from 10 CFR 50.44(c)(3)(i).

Sincerely,

Original signed by

Mary F. Haughey, Project Manager
Project Directorate I-1
Division of Reactor Projects, I/II

cc: See next page

PDI-1	PDI-1	PDI-1
CVogan	MHaughey:dlg	RCapra
5/25/88	5/25/88	5/25/88

cc:

Mr. Troy B. Conner, Jr., Esq.
Conner & Wetterhahn
Suite 1050
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Mr. Richard Goldsmith
Syracuse University
College of Law
E. I. White Hall Campus
Syracuse, New York 12223

Mr. Don Hill
Niagara Mohawk Power Corporation
Suite 550
4520 East West Highway
Bethesda, MD 20814

Resident Inspector
Nine Mile Point Nuclear Power Station
P. O. Box 99
Lycoming, New York 13093

Mr. Gary D. Wilson, Esquire
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Mr. Peter E. Francisco, Licensing
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Ms. Donna Ross
New York State Energy Office
2 Empire State Plaza
16th Floor
Albany, New York 12223

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. Paul D. Eddy
New York State Public Serice
Commission
Nine Mile Point Nuclear Station -
Unit 2
P.O. Box 63
Lycoming, New York 13093

Mr. Richard M. Kessel
Chair and Executive Director
State Consumer Protection Board
99 Washington Avenue
Albany, New York 12210

Mr. Richard Abbott, Unit 2 Station
Superintendent
Nine Mile Point Nuclear Station
Niagara Mohawk Power Corporation
P. O. Box 32
Lycoming, NY 13093

Mr. James L. Willis, General Supt.,
Nuclear Generation
Nine Mile Point Nuclear Station
Niagara Mohawk Power Corporation
P. O. Box 32
Lycoming, NY 13093

The staff requested to be informed of the difference between the restart test procedure (and results) and a preoperational test procedure (and results).

Concerning the difference between BFN and SQN

Refer to Viewgraph 9, Comparison to Sequoyah"

BFN is an older plant than SQN. Whereas SQN was able to determine current configuration from documents on file, BFN, an older plant, will require more updating of configuration. As a general rule, BFN will not go back to the original startup test specs and results but will perform tests based on current configuration.

Refer to Viewgraph 4, "Fundamentals of Restart Test Program"

BFN explained what graded approach to testing means. They essentially reviewed their breakdown in terms of categories of Restart Test Program.

Refer to Viewgraph 5, "Restart Test Program Additional Testing Planned"

The discussion indicated the staff is concerned that power ascension testing be a part of RTP. TVA emphasized that, power ascension testing is a part of RTP. TVA further stated that variations in restart Power Ascension Testing from inital startup will not be explained in the test procedure.

The staff requested a paragraph on depth and breadth of the items on Viewgraph 5.

Refer to Viewgraph 6, "Restart Test Program Administration and Control"

This viewgraph sums up TVA's response to staff concerns about the use of original startup test data, maintenance test data and surveillance test data.

The staff requested that TVA provide the explanation of the differences between each restart test specification and the corresponding specification from initial startup test. Further, where there are variances, justification should be given.

TVA responded with the following commitment. Danny Walker will provide variance between Restart Test procedures and initial startup test procedures; Don Hosmer will document credit taken for past performance. Commitments by TVA to respond with additional information are summarized at the end of this section.

Refer to Viewgraph 8, "Interface with Other Site Programs"

TVA explained the significant interfaces between RTP and other site programs. The most significant in the opinions of the staff was Design Baseline and Verification Program (DBVP) because of the need for establishing and maintaining current configuration.

Refer to Viewgraph 10, "BFN RTP Organization Chart"

See charts included as Enclosure 4. The names and slot assignments checked out with the current approved BFN organization chart dated February 24, 1988. There are two consultants Jerry Martin, Assistant Plant Manager and John Hashagan, Lead Engineer in the Electrical Test areas under the RTP. The remainder of the people at the RTP meetings are TVA employees.

Refer to Viewgraph 11

This is a quantative tally of completion status of the various component parts of RTP. The viewgraph is self-explanatory - e.g., 8 of 43 tests had been conducted at the time of the meeting.

At the close of the first session, TVA provided some information on DG testing to be covered during the second session dealing with details of DG testing.

Summary of Diesel Generating Test

Calibration Test

Load Shedding and Sequencing Tests

Load Acceptance Tests

Loss of Offsite Power/Loss of Coolant Accident Tests (4 tests)

24 Hour fuel consumption runs

Loss of offsite power during power ascention at 25% power

This first session on RTP closed with Angelo Marinos emphasizing that during the detailed Diesel Generator Test discussions, he desired one on one talks with the people who are running the test. TVA responded that William H. Nelson, the engineer running the Diesel Generator tests would be at the second session.

In conclusion, from the NRC's point of view this meeting was helpful in providing NRC with details of the restart test program. Development of baseline test requirements, difference between restart test procedures and "full fledged" pre-operational tests, and details of acceptance testing were discussed.

In order to clarify and address NRC concerns resulting from the above discussions, TVA has agreed to provide NRC with the following additional information:

- Provide documentation and justification on differences between pre-operational test requirements and RTP baseline test requirements. (In TVA's parlance, "Preoperational Test" is "Fully Integrated Functional System Test").

- Provide list of previous run test data (SI's, EMI's etc.) which will be used by restart test program in lieu of actual testing.

- Provide general description of testing to be accomplished during integrated cold functional testing LOP/LOCA and remote shutdown drill.

- A paragraph on the depth and breadth if the items on Viewgraph 5.

Subsequent to the meeting TVA stated they would transmit clarifying information requested by the staff by May 20, 1988.

SECTION 2

DIESEL GENERATOR TESTING DETAIL

The attendance roster is Enclosure 2.

TVA gave a brief summary of the previous session on the RTP program in general. The following are significant points of the briefing.

Diesel Generator testing is to be performed in sufficient depth to minimize as much as possible the need for calculations.

The load sequence test is similar to SQN, however, there will be unique crosstie conditions in the setup at Browns Ferry (BFN) to allow for full load testing of the three main loads. TVA will also apply the constant KVA load on the DG prior to loading on the sequence testing as required.

The random loads block will also be applied during the load sequence test.

GE will be conducting a transient load analysis to simulate generator response. BFN has 2600 kw machines vs 4000 kw at SQN.

TVA indicated that they plan to take credit for the actual load power factor as done at SQN.

TVA stated they would attempt to maintain constant KVA loads as closely as possible. TVA stated that limited load testing has been done at BFN.

BFN stated they were currently working on 1B DG to replace a turbocharger.

TVA stated their objective is to benchmark from DG 1A and 1B.

The staff indicated that if TVA takes credit for a preoperational test, the configuration of that portion tested must be the same at restart as it was for the preoperational test.

Subsequent to the meeting, TVA provided the following explanation of the difference between preoperational testing and restart testing as perceived at TVA: Preoperational Testing of a system is a sequential exercise, where the testing is continued through the interfaces with other systems; whereas, Restart Testing involves functional testing of RTP systems which are tested independently of interfacing systems. However, interface signals are verified both as to transmission of the signal and receipt of the signal by the interfacing system.

In response to a question concerning loading intervals of the Diesel Generators. TVA stated they would run for 24 hours as follows:

2 hours	22 hours
@2950±50KW	@2850±50KW

TVA stated that the BFN Technical Specification (TS) call for testing at 3/4 of continuous rating.

TVA was informed by the staff that if credit is taken for rating not in the TS's then the TS's must be modified to include the rating.*

TVA stated they are testing to the manufacturer's rating: Tech. Specs are another matter. The staff questioned TVA's ability to justify voltage drops down to 45% of nominal during transient loading of the diesel generators.

TVA stated they are looking into the MCC contactor performance at those low voltages.

The staff asked whether General Electric (GE) is going to take BFN's test data and run it as a comparison to the GE Code? TVA responded that their objective is to establish a baseline and hopefully obtain a 1:1 relationship with the GE Code. There will be possible T.S. change as to DG ratings and load response.

*BFN was asked to setup a teleconference with NRC PM to layout a schedule for any Tech. Spec. changes so they can be handled smoothly and in a timely manner.

David H. Moran, Project Manager
TVA Projects Division
Office of Special Projects

Enclosures:
1. April 26, 1988 a.m. Attendance List
2. April 26, 1988 p.m. Attendance List
3. Restart Test Program
4. Organization Chart

Distribution
Docket File NRC PDR
Local PDR Those on Attached List

cc w/enclosures:
S. Ebneter
S. Richardson
Projects Staff

OSP:TVA/PM	OSP:TVA/BC	OSP:TVA/PM
DMoran:lab	AMarinos	GGears
5/24/88	5/24/88	5/24/88

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David H. Moran, Project Manager
TVA Projects Division
Office of Special Projects

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3. Restart Test Program
4. Organization Chart

cc w/enclosures:
See next page

Browns Ferry Nuclear Plant,
Units 1, 2, and 3

cc:
General Counsel
Tennessee Valley Authority
400 West Summit Hill Drive
E11 B33
Knoxville, Tennessee 37902

Mr. R. L. Gridley
Tennessee Valley Authority
5N 157B Lookout Place
Chattanooga, Tennessee 37402-2801

Mr. H. P. Pomrehn
Tennessee Valley Authority
Browns Ferry Nuclear Plant
P.O. Box 2000
Decatur, Alabama 35602

Mr. M. J. May
Tennessee Valley Authority
Browns Ferry Nuclear Plant
P.O. Box 2000
Decatur, Alabama 35602

Mr. D. L. Williams
Tennessee Valley Authority
400 West Summit Hill Drive
W10 B85
Knoxville, Tennessee 37902

Chairman, Limestone County Commission
P.O. Box 188
Athens, Alabama 35611

Claude Earl Fox, M.D.
State Health Officer
State Department of Public Health
State Office Building
Montgomery, Alabama 36130

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Resident Inspector/Browns Ferry NP
U.S. Nuclear Regulatory Commission
Route 12, Box 637
Athens, Alabama 35611

Mr. Richard King
c/o U.S. GAO
1111 North Shore Drive
Suite 225, Box 194
Knoxville, Tennessee 37919

Dr. Henry Myers, Science Advisor
Committee on Interior
and Insular Affairs
U.S. House of Representatives
Washington, D.C. 20515

Mr. S. A. White
Manager of Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

50-259

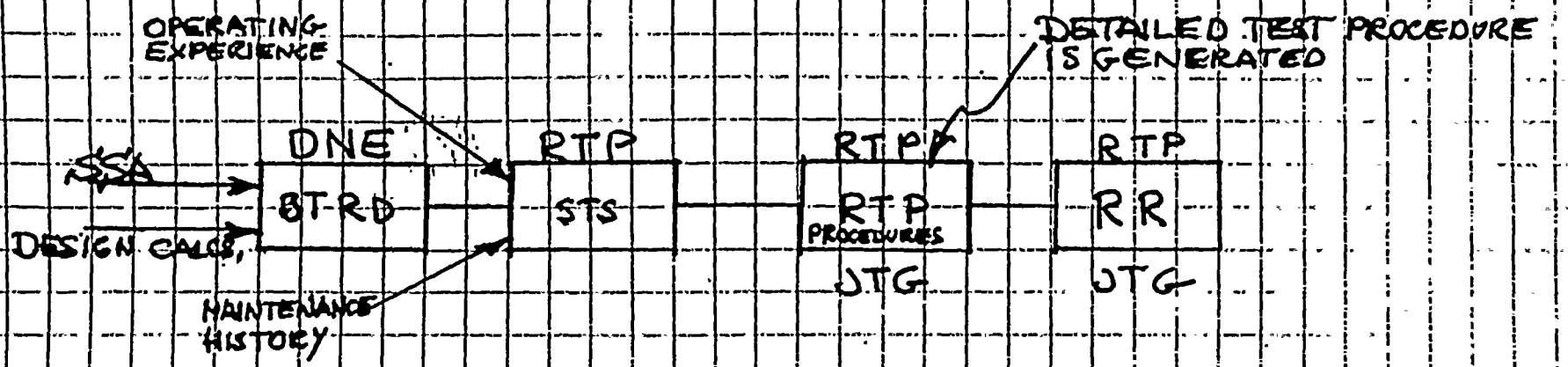
DISTRIBUTION FOR MEETING SUMMARY DATED: May 24, 1988

Facility: Browns Ferry Nuclear Plant, Units 1, 2 and 3*

Docket File
NRC PDR
Local PDR
Projects Reading
S. Ebneter
J. Partlow
J. Axelrad
S. Richardson
S. Black
B. D. Liaw
G. Gears
D. Moran
J. Kelly
M. Simms
OGC
J. Rutberg
F. Miraglia
E. Jordan
W. C. Bender
E. F. Christnot
S. Traiforos
G. L. Paulk
H. Garg
A. Marinos
ACRS (10)
Hon. M. Lloyd
Hon. J. Cooper
Hon. D. Sundquiest
Hon. A. Gore
Dr. Henry Myers
Mr. R. King, GAO
P. Gwynn
J. Scarborough
G. Marcus
C. Miller
T. Elsasser
C. Ader
TVA-Rockville
BFN Rdg. File

*cc: Licensee/Applicant & Service List

FIGURE 1



LEGEND

SSA	SAFE SHUTDOWN ANALYSIS
BTRD	BASELINE TEST REQUIREMENTS DOCUMENT
RTP	RESTART TEST PROGRAM
STS	SYSTEM TEST SPECIFICATION
RR	REVIEW RESULTING TEST PROCEDURES
DNE	DEPARTMENT OF NUCLEAR ENGINEERING
JTG	JOINT TEST GROUP

Enclosure 1

RTP MEETING BFN
ROSTER

David H. Moran	NRC/OSP
Joe Savage	TVA/BFN/Licensing
Hukam Garg	NRC/OSP
Angelo Marinos	NRC/ODP
William C. Bender	NRC - Resident Inspector
E. F. Christnot	NRC - Resident Inspector
Spyros Traiforos	NRC - Consultant
Don Hosmer	TVA/BFN
David Skridulis	TVA/BFN
John Lee Sparks	TVA/BFN
M. May	TVA/Licensing
Jerry D. Martin	TVA
G. L. Paulk	NRC/Resident
P. J. Polk	TVA - Rockville
J. G. Walker	TVA

Enclosure 2

RTP MEETING BROWNS FERRY

DIESEL GENERATOR TESTING

ATTENDANCE ROOSTER

David H. Moran	OSP
John C. Hashagan	TVA/RTP
William H. Nelson, Jr.	TVA/DNE
Jim Hutson	TVA/DNE
Jeffrey M. Ruddy	TVA/DNE
Don Hosmer	TVA
William C. Thomison	TVA
Hukam Garg	OSP
Angelo Marinos	OSP
B. C. Morris	BFN
E. F. Christnot	RII
Masoud Bajestani	TVA - Systems Engineer
Ed Freeman	TVA - Systems Engineer
John Lee Sparks	TVA - Systems Engineer

Enclosure 3

BROWNS FERRY

RESTART TEST PROGRAM

+ PHILOSOPHY

+ FUNDAMENTALS OF PROGRAM

+ ADMINISTRATION AND CONTROL

+ INTERFACE WITH OTHER BROWNS FERRY PROGRAMS

+ COMPARISON TO SEQUOYAH

+ SUMMARY

RESTART TEST PROGRAM
PHILOSOPHY

+ DUE TO PROLONGED OUTAGE AND EXTENSIVE MODIFICATIONS ALL SYSTEMS NEED TO BE REVIEWED FOR TESTING REQUIREMENTS TO VERIFY SAFE AND RELIABLE OPERATION OF THE PLANT

+ RTP IS IN ADDITION TO THE POST MOD TEST PROGRAM AND THE SURVEILLANCE PROGRAM

+ RESTART TEST REQUIREMENTS WILL BE DOCUMENTED
  - SYSTEM TEST SPECIFICATIONS
  - SYSTEM TEST INSTRUCTIONS

+ A GRADED APPROACH TO TESTING ON VARIOUS SYSTEMS WILL BE USED

+ TESTS WILL BE CONDUCTED BY APPROVED INSTRUCTIONS

+ TEST PROGRAM WILL BE CONTROLLED BY ADMINISTRATIVE PROCEDURES

+ TEST RESULTS WILL BE REVIEWED AND APPROVED PRIOR TO APPROPRIATE MILESTONES

+ A JOINT TEST GROUP (JTG) WILL SERVE AS A DEDICATED REVIEW GROUP FOR THE RESTART TEST PROGRAM

JOINT TEST GROUP

PORC SUBCOMMITTEE

MEMBERSHIP

CHAIRMAN - UNIT 2 SUPERINTENDENT

JTG MEMBERS - OPERATIONS

QUALITY ASSURANCE

DIVISION OF NUCLEAR ENGINEERING

TECHNICAL SUPPORT

MODIFICATIONS

MAINTENANCE

RESTART TEST PROGRAM

NSSS VENDOR REPRESENTATIVE

CHARTER

REVIEW AND RECOMMEND APPROVAL OF SYSTEM TEST SPECIFICATIONS AND REVISIONS.

REVIEW AND RECOMMEND APPROVAL OF RESTART TEST PROGRAM TEST INSTRUCTIONS, REVISIONS AND TEST RESULTS

APPROVAL TO START TEST CONDUCT

FUNDAMENTALS OF RESTART TEST PROGRAM

+ GRADED APPROACH TO TESTING

+ CATAGORIES OF SYSTEM TESTING
  - GROUP 1: CRITICAL TO SAFE OPERATION OF PLANT
  - GROUP 2: SUPPORT TO PLANT OPERATION
  - GROUP 3: NOT DIRECTLY SUPPORTING OPERATION OR IMPORTANT TO SAFETY

+ CRITERIA USED TO DETERMINE LEVEL OF TESTING:
  - DESIGN BASELINE AND VERIFICATION PROGRAM (DB&VP) TEST REQUIREMENTS
  - IMPORTANCE TO SAFETY OF PLANT
  - EXTENT OF MODIFICATIONS
  - OPERATIONAL AND MAINTENANCE HISTORY
  - OPERATOR TRAINING

+ SYSTEM GROUP AND TESTING APPROVED BY JTG
  - GROUP 1: MAJORITY OF SYSTEM TESTING SPECIFIED BY DB&VP PROGRAM
  - GROUP 2: FEW OR NO TEST REQUIREMENTS SPECIFIED BY DB&VP; MAJORITY OF SYSTEM ADDRESSED BY RTP REVIEW FOR TESTING REQUIREMENTS
  - GROUP 3: LITTLE OR NO TESTING; REVIEW OF SYSTEM FOR PROPER OPERATION AND MAINTENANCE ONLY.

RESTART TEST PROGRAM

ADDITIONAL TESTING PLANNED

+ INTEGRATED TESTING PRIOR TO PLANT STARTUP
  - LOSS OF OFFSITE POWER/LOSS OF COOLANT TEST
  - INTEGRATED COLD FUNCTIONAL TESTING
  - REMOTE SHUTDOWN DRILL

+ POWER ASCENSION TESTING
  - CONTINUED SYSTEM OPERATIONAL TESTS
  - CONTROL SYSTEM TUNEUP TESTS
  - TRANSIENTS, TRIPS, SCRAMS

RESTART TEST PROGRAM

ADMINISTRATION AND CONTROL

+ OVERALL ADMINISTRATION AND CONDUCT OF RESTART TEST PROGRAM WILL BE DEFINED BY APPROVED PROCEDURES

+ SYSTEM TEST SPECIFICATION
  - TEST REQUIREMENTS FROM DESIGN BASELINE & VERIFICATION PROGRAM
  - TEST REQUIREMENTS FROM REVIEW OF OPERATION AND MAINTENANCE HISTORY, MODIFICATIONS, VENDOR INFORMATION

+ EXISTING SITE TEST PROCEDURES CAN BE USED
  - SURVEILLANCE INSTRUCTIONS, POST MOD TESTS, MAINTENANCE INSTRUCTIONS, ETC.
  - IF TEST WAS PREVIOUSLY RUN, RTP REVIEW AND JTG APPROVAL REQUIRED FOR ACCEPTANCE.

+ SYSTEM TEST INSTRUCTIONS
  - SPECIFIES EXISTING SITE TEST PROCEDURES TO BE USED TO MEET SOME TEST REQUIREMENTS
  - ADDITIONAL TEST INSTRUCTIONS TO MEET REMAINING TEST REQUIREMENTS

RESTART TEST PROGRAM
ADMINISTRATION AND CONTROL
(CONTINUED)

+ CONDUCT OF TESTING
  - QUALIFIED TEST ENGINEERS TO RUN, WITNESS, OR REVIEW TESTS.
  - CONTROL OF TESTING: TEST LOGS, REVERIFICATION OF PREREQUISITES, DOCUMENTATION OF EXCEPTIONS,ETC.
  - QC TO WITNESS PORTIONS OF TESTS AS APPROPRIATE

+ JOINT TEST GROUP TO REVIEW AND APPROVE ALL DOCUMENTATION
  - MEMBERSHIP FROM VARIOUS SITE ORGANIZATIONS
  - SERVES AS PORC SUB-COMMITTEE
  - REVIEWS AND APPROVES TEST RESULTS

INTERFACE WITH OTHER SITE PROGRAMS

+ DESIGN BASELINE AND VERIFICATION (DB & VP) PROGRAM
  - PROVIDES SYSTEM TEST REQUIREMENTS TO RESTART TEST PROGRAM
  - TEST PROCEDURES AND RESULTS PROVIDED TO DB & VP PROGRAM
  - MEMBER OF JOINT TEST GROUP

+ OPERATIONAL READINESS PROGRAM
  - RESTART TEST PROGRAM WILL ADDRESSED IN THE OR

+ POST MODIFICATION TEST SECTION
  - SERVE AS TEST DIRECTOR WHERE NECESSARY

+ SYSTEM ENGINEERS SECTION
  - PROVIDES REVIEW OF DB & VP TEST REQUIREMENTS
  - ASSIST WHEREVER POSSIBLE ON RESTART TEST PROGRAM AS TEST DIRECTORS
  - MEMBER OF JOINT TEST GROUP

+ OPERATIONS ORGANIZATION
  - CONTROL OF SYSTEM DURING PERIOD OF TESTING
  - MEMBER OF JOINT TEST GROUP

C O M P A R I S O N T O S E Q U O Y A H

+ SEQUOYAH IS POST TMI, BROWNS FERRY IS PRE-TMI

+ VOLUME AND RETRIEVABILITY OF EARLY TEST AND MODIFICATION DATA AT SQN MADE IT POSSIBLE TO EVALUATE ONLY CHANGES MADE SINCE OL.

+ AT BFN, RESTART TEST IS PROVING SAFE SHUTDOWN FUNCTIONS RATHER THAN EVALUATING EFFECT OF MODS ON THESE FUNCTIONS.

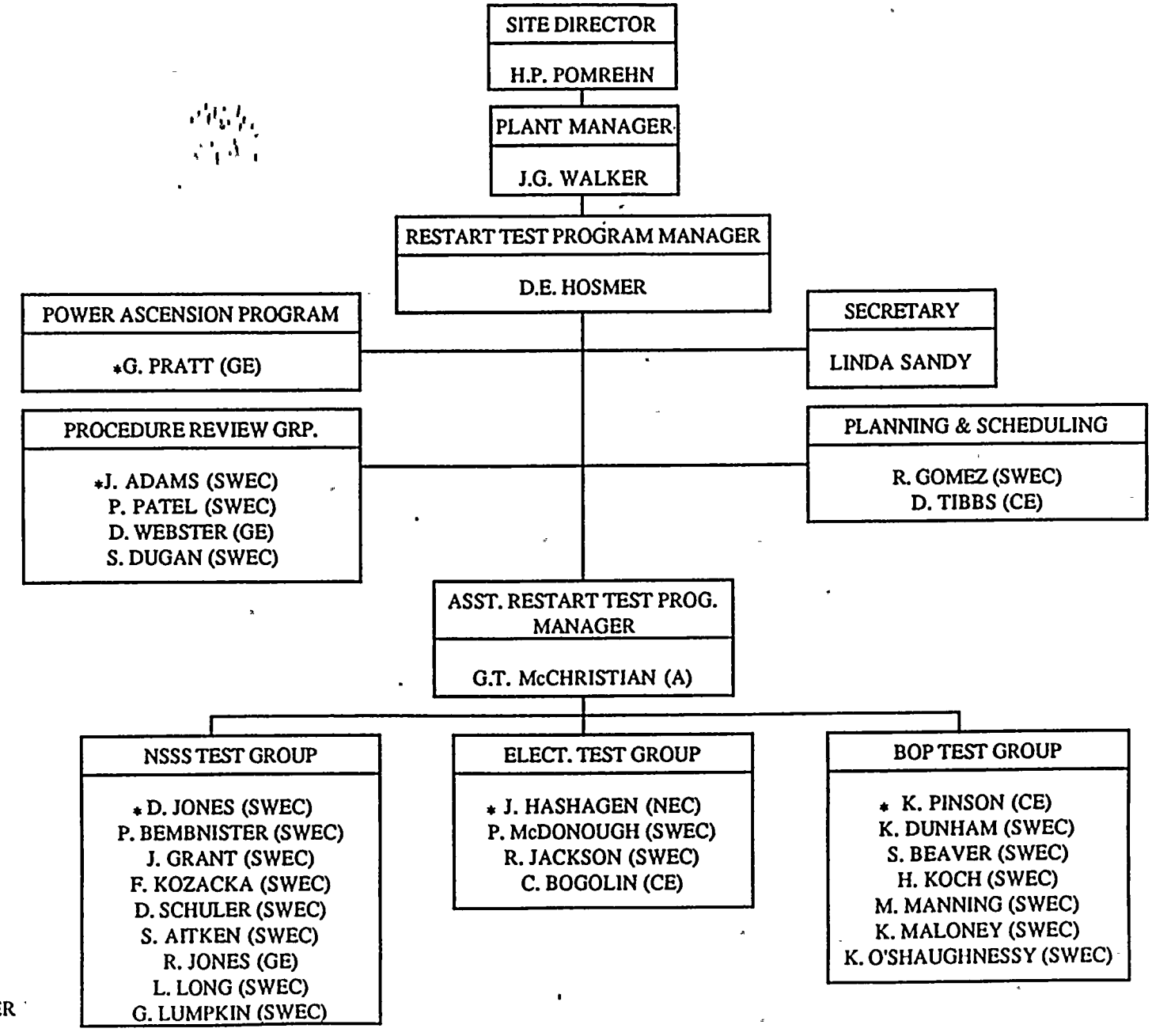
+ BFN USES SI'S WHERE POSSIBLE, BUT NOT TO THE EXTENT THAT SEQUOYAH DID.

+ REPORTING LEVELS ARE DIFFERENT ON PAPER, BUT ARE FUNCTIONALLY SIMILAR.

  SQN - REPORTS TO SITE DIRECTOR
  BFN - REPORTS TO PLANT MANAGER

+ JTG AT BFN IS A PORC SUBCOMMITTEE RATHER THAN A SEPARATE BODY REPORTING TO SITE DIRECTOR AS AT SQN.

BROWNS FERRY NUCLEAR PLANT
RESTART TEST PROGRAM
ORGANIZATION CHART



* LEAD ENGINEER

RESTART TEST PROGRAM

41 / 41 TEST SPECIFICATIONS APPROVED

34 / 43 TEST PROCEDURES APPROVED

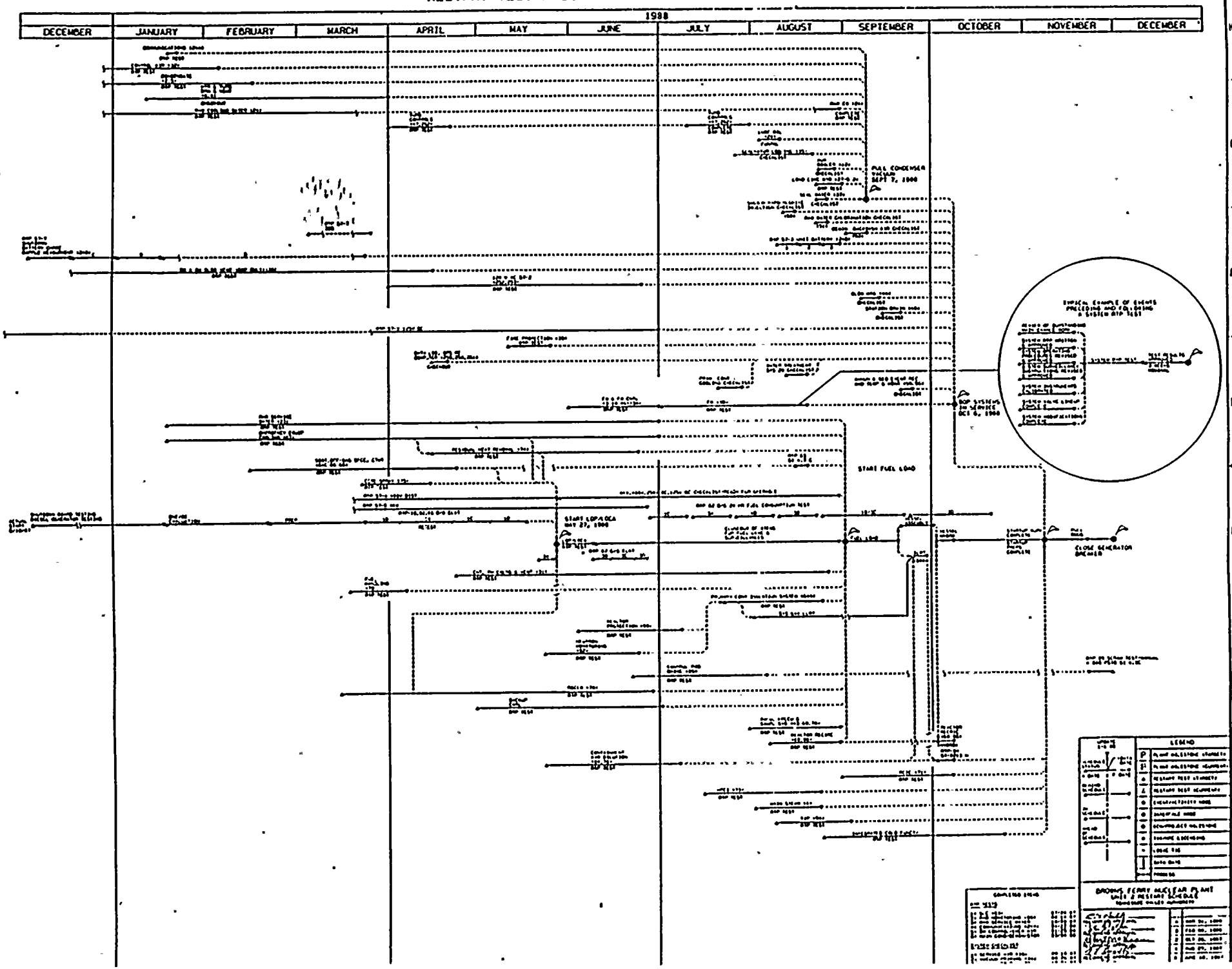
08 / 43 TESTS CONDUCTED

14 / 43 TESTS STARTED / IN PROGRESS

02 / 43 JOINT TEST GROUP APPROVAL OF TEST RESULTS OBTAINED

08 / 45 SYSTEM CHECKLIST COMPLETE

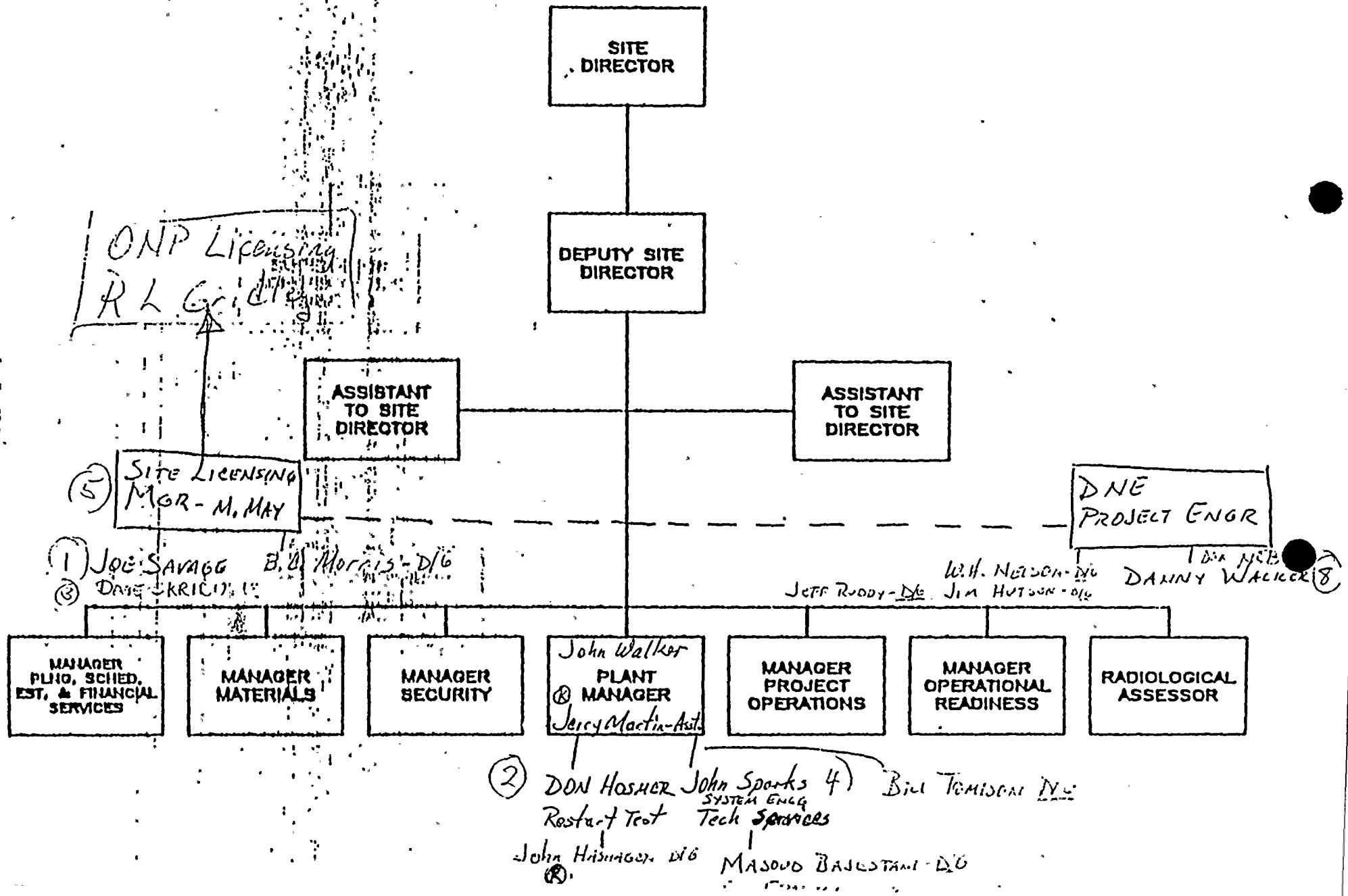
RESTART TEST PROGRAM PERFORMANCE SCHEDULE



Enclosure 4

Hugh Dowdy
SITE DIRECTOR DA

SITE DIRECTOR



John Walker 2-18
PRINCIPAL MANAGER DATE

SITE DIRECTOR 2-18 DATE

PLANT MANAGER