

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-237; 50-249  
License Nos: DPR-19; DPR-25

Report Nos: 50-237/99004(DRS); 50-249/99004(DRS)

Licensee: Commonwealth Edison Company

Facility: Dresden Generating Station Units 2 and 3

Location: 6500 North Dresden Road  
Morris, IL 60450

Dates: January 21, 22, 25-27, 1999

Inspector: D. Schrum, Reactor Engineer

Approved by: R. N. Gardner, Chief, Engineering Specialists Branch 2,  
Division of Reactor Safety

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## EXECUTIVE SUMMARY

Dresden Generating Station, Units 1 & 2  
NRC Inspection Report 50-237/99004; 50-249/99004

This inspection reviewed aspects of licensee corrective actions and engineering involvement in the corrective action process. The inspector concluded that the licensee was effective in implementing corrective actions for the specific items reviewed. In addition, the engineering staff was knowledgeable and involved in the corrective action process for the specific items in this report.

### Engineering

Corrective actions were acceptable (All Sections).

Engineering involvement in the corrective action process was good for the specific items reviewed (All Sections).

## Report Details

### III. Engineering

The inspection included a review of the licensee's corrective actions and engineering involvement in the corrective action process. The inspector determined that the licensee was effective in implementing corrective actions for the specific items reviewed. The engineering staff was knowledgeable and involved in the corrective action process for the specific items discussed in this report.

#### **E8 Miscellaneous Engineering Issues (IP 92903, IP 92720, 37550)**

E8.1 (Closed) Violation 50-237/249/97009-01(DRP): This violation was issued for not promptly correcting the improper storage of boric acid and borax, which is used during emergency operating procedures to shut down the reactor. Also, the containers were not labeled to be in compliance with Dresden's chemical control program.

The licensee's corrective actions included replacing the storage containers with new labeled, sealed containers. During the transfer to the new containers the boron chemicals were inspected for foreign materials, which had been an NRC concern. The licensee committed to replacing the containers every five years. A memo was sent to Operations personnel to heighten their awareness for these types of problems. In addition, Dresden Operating Surveillance (DOS) 0010-15, "Dresden Emergency Operating Procedure (DEOP) Equipment Storage Cabinet Inspection," was revised to include the verification of canister integrity and seal inspection.

The inspector had no additional concerns. This violation is closed.

E8.2 (Closed) Violation 50-237/249/98009-04(DRP): This violation was issued for a failure to follow Dresden Fire Protection Procedure (DFPP) 4100-03, "Fire Watch Procedure," and DFPP 4175-01, "Fire Barrier Integrity and Maintenance." A fire door was blocked open with a fire watch assigned to watch the area without notifying the Work Execution Center (WEC).

The licensee's corrective actions included a revision to DFPP 4100-03 and DFPP 4175-01 to require that the WEC or Unit Supervisor be contacted for all fire barrier issues. The Safety and Property Loss Prevention and Valve Maintenance Supervisors were counseled.

The inspector verified that the revisions had been made to these procedures. In addition, a review of problem identification forms (PIFs), sorted for not obtaining a fire watch prior to impairing a barrier or notifying the WEC, indicated that there was only a limited number of these problems during the past six months. The licensee's corrective actions were effective for this problem. This violation is closed.

E8.3 (Closed) Violation 50-237/249/98005-02(DRS): This violation was issued for a failure to maintain medical documentation for a licensed operator. The licensee did not ensure the

availability of current medical data and could not provide the data to the NRC upon request.

For the individual in question the licensee determined that the medical exam had occurred. A signed statement from the physician was available for review. The licensed operator was immediately re-evaluated by the physician and found to be medically qualified to perform licensed duties.

The licensee's corrective actions included counseling the License Coordinator for failing to follow the requirements of the station procedure governing the scheduling and completion of operator biennial medical examinations. In addition, the station's Quality and Safety Assessment (Q&SA) department performed a review of the adequacy of the station's program to medically certify licensed operators. Q&SA identified that as of March 11, 1998, nine individuals still had outstanding medical issues that had not been completed. Operations developed an action plan to ensure that this problem would not occur again. A Nuclear Tracking System (NTS) item was created to ensure that the staff was alerted for the next medical examinations for the operators. The medical records were completed for the nine individuals. No additional corrective actions were required. This item is closed.

- E8.4 (Closed) Violation 50-237/249/97028-03(DRP): This violation was issued for a failure to follow radiation protection procedures. A hose that crossed a boundary between a contaminated and non-contaminated areas was not taped or secured to prevent the spread of contamination.

The licensee's corrective actions for this problem included reinforcing proper controls during Maintenance pre-job briefings, including this item on the Pre-Job Briefing Checklist, and information on this issue being included in the daily orders. Management oversight was increased in this area. The Radiation Protection Department has added this item to its scorecard process as a specific observation during plant tours. A tailgate meeting was held to reinforce proper controls of hoses that cross contaminated area boundaries.

The inspector reviewed PIFs issued during the last six months for hoses that were not secured. Even with the increased staff attention in this area, there were a few hoses identified as not being secured. The Operations Assessment Group was touring the plant to identify any problems of this type in the plant during this inspection. The inspector had no additional concerns in this area. This item is closed.

- E8.5 (Closed) Violation 50-249/97027-01(DRS): This violation was issued for the inability to retrieve the radiographic record of a Unit 3 High Pressure Coolant Injection (HPCI) pipe weld.

The radiograph was found in a Central Files hold file a month after the completion of the NRC inspection. The transmittal sheet was missing with the Document Type code which identifies the item's storage location in the vault. The Quality Control Instruction was

revised when it was identified that it did not adequately address what was to happen to the original Reader Sheet and the associated film.

During an audit, Q&SA identified that Central Files had not provided good oversight and control over the generation, storage, and retention of records. In addition, six of eight departments were determined to be deficient for records' storage and procedure adherence. Numerous types of problems were identified concerning record storage.

The licensee's corrective actions included identifying and training a record custodian in each department. Responsibilities for the custodians were identified. In addition, required documents were identified as needed for retention or discard. The filming of documents was increased so storage requirements could be met. Q&SA systematically reviewed and accepted the closure of the NTS items associated with the record storage problems. All the corrective actions were completed during 1998.

The inspector verified that above corrective actions were completed. The inspector had no additional concerns in this area. This violation is closed.

- E8.6 (Closed) Violation 50-237/249/98005-01(DRS): This violation was issued for the failure to maintain adequate emergency diesel generator (EDG) operating procedures to facilitate safe EDG loading and unloading evolutions.

The licensee's corrective action included a revision to EDG related operating procedures and surveillances to include guidance on EDG unloading prior to opening the output circuit breaker. Dresden Operating Procedures (DOP) 6600-02, "EDG 2(3) Startup," and DOP 6600-05, "EDG 2/3 Startup," were revised to incorporate acceptable parameter guidance and controls for conditions when the EDG has auto started and to correct the improper frequency reference. DOP 6500-09, "Bus 24-1 to Bus 34-1 Tie Breaker Operation Utilizing U2(3) D/G," was revised to provide procedural guidance regarding the unloading of the generator and opening the output breaker.

The inspector verified that the procedures had been revised. The NTS items associated with the corrective actions were verified as closed. The corrective actions were effective in preventing a recurrence of problems in this area. This item is closed.

- E8.7 Closed) Violation 50-237/249/98003-01a(DRP): This violation was issued for an inadequate surveillance procedure, Dresden Instrument Surveillance Test (DIS) 0263-14, "Local Reactor Level Indicator (Safe Shutdown) Yarways Calibration," that did not bypass the trip functions and resulted in an automatic reactor scram.

DIS 0263-14 was revised to be performed off-line and to ensure the reactor vessel is flooded up prior to performing the calibration procedure. Training was given to re-enforce conservative decision making. A multi-disciplined team reviewed all activities removed from the D2R15 refueling outage that were rescheduled for on-line maintenance. A scope and review process was implemented for future PM activities and surveillance procedures previously conducted during refueling outages that are to be performed on-line. Dresden Administrative Procedure (DAP) 21-03, "Processing Plant

Design Changes," was revised so that all design team members would identify the design impact of decisions. Design team engineers were reminded to follow DAP 21-03 to ensure a thorough design review. This included a review of industry events and thoroughly questioning maintenance and operation personnel during scope meetings. The inspector was satisfied with the licensee's corrective actions. This violation is closed.

- E8.8 (Closed) Violation 50-237/249/98003-01b(DRP): This violation was issued for an inappropriate work request (WR) that specified the installation of an incorrect Motor Control Center (MCC's) 120-Volt coil (480-volt coil required) on the 2/3 emergency diesel generator vent fan.

Corrective actions included the installation of the correct coil. A root cause investigation was performed and Root Cause Report 237-200-98-00100 was issued. In addition, a file system was established with walkdown checklists. Individual performance issues were identified and personnel performance discipline was taken in accordance with the Management Action Response Checklist (MARC) manual. Maintenance planning implemented new procedures for maintenance planning, work package preparation, identifying and procuring parts, and post work review requirements for package closure.

The inspector verified that NTS items had been assigned to these corrective actions and had been closed. The inspector was satisfied with the licensee's corrective actions. This violation is closed.

- E8.9 (Closed) Violation 50-237/249/98003-01c(DRP): This violation was issued for an inadequate work instruction that did not check for the proper direction of the EDG oil pump rotation following maintenance on the pump.

The licensee's corrective action included establishing a file system with walkdown checklists. Dresden Maintenance Surveillance (DMS) 6600-02, "Diesel Generator Mechanical Inspection and Preventive Maintenance," was revised to include a rotation check of motors following maintenance. In addition, the maintenance staff was reminded of the site's expectations for ensuring the work is done correctly.

The inspector verified that the procedure changes had been made and the associated NTS items had been closed. The licensee's corrective actions were adequate. This item is closed.

- E8.10 (Closed) Violation 50-237/249/98003-01d(DRP): This violation was issued for not erecting scaffolding according to Dresden Maintenance Procedure (DMP) 0018-08. Scaffolding was in direct contact with a containment cooling service water system valve.

The licensee's corrective actions included moving the scaffolding away from the valve. The responsible individuals were disciplined. The Operations Assessment Group was inspecting plant scaffolding during this inspection. The corrective actions for this problem were adequate. This violation is closed.

- E8.11 (Closed) Violation 50-249/98021-01(DRP): This violation was issued for moving irradiated fuel in the secondary containment when the Refrigeration Control Unit (RCU) of the Control Room Emergency Ventilation System was inoperable.

The licensee's corrective actions included a multi-department review of emergent work. Also, scheduling was revised to indicate mode changes on the Site Integrated Schedule. The Shift Operations Supervisor gave expectations for listing "compensatory actions" on the Limiting Condition of Operation (LCO) Board located in the Control Room. A review of Fuel Handling Procedures was performed to identify Technical Specification (TS) LCOs. A review of other plant procedures was performed to identify applicable TSs. Operations matrixed the TSs where single systems cross multiple TS sections. TS retraining was given for Senior Reaction Operators (SROs) and Licensed Operators.

The inspector verified that applicable NTS items were closed. This item is closed.

- E8.12 (Closed) Violation 50-237/249/97028-02(DRP): This violation was issued for an Electrical Maintenance Department (EMD) First Line Supervisor manipulating a float switch on a Unit 3 125 volt direct current (Vdc) battery charger without a procedure in hand. Also, the supervisor should not have touched the equipment in his oversight role.

The supervisor was removed from duty in accordance with established management principles. The supervisor was tasked with performing an "Apparent Cause Evaluation" and providing lessons learned training to staff personnel.

The Maintenance Department provided a tailgate meeting on procedure adherence and proper use of Conditions Met during the performance of steps within a procedure. Training forms were available for review. The Maintenance Department evaluated procedure adherence trends to determine the need for specific procedure adherence training. Performance adherence monitoring was performed by Q&SA, Scorecard Program, senior management, and Operations Department peer reviews.

The specific corrective actions for procedure adherence for this circumstance were adequate. This item is closed.

- E8.13 (Closed) Violation 50-237/249/98013-02(DRP): This violation was issued for the failure to promptly identify and correct the potential to bypass the containment pressure suppression function when deinerting and inerting the containment, while the drywell was directly connected to the torus atmosphere. This problem resulted in an enforcement conference with the licensee.

The licensee's corrective actions included revising plant operating procedures to prevent containment vent alignments which would bypass the containment pressure suppression function. The Site Vice President communicated expectations to station personnel regarding appropriate problem follow-up. Training was provided to engineering personnel emphasizing expectations and the threshold for initiating deficiency documents. In addition, the Regulatory Assurance Manager developed an action plan to address concerns raised by the NRC. Nuclear Station Work Procedure (NSWP)-A -06, "OPEX Review," was revised to ensure that PIFs that

result in Licensee Event Reports (LERs) are reviewed for applicability at all Commonwealth Edison Nuclear Stations. This violation is closed.

E8.14 (Closed) Violation 50-237/249/97007-03a(DRS); (Closed) Violation 50-237/249/97007-03b(DRS); (Closed) Violation 50-237/249/97007-03c(DRS): This violation (with three examples of the violation) was issued for the failure of station personnel to follow applicable foreign material exclusion (FME) procedures.

For Violation (a) the Main Steam Isolation Valve Room was cleaned-up, extra protective clothing removed, and housekeeping discussed at daily debriefs. For violation (b) the work was completed and FME cover was replaced over a valve cover for MOV 3-220-3 to protect limit switches and electrical connections. For violation (c) the corrective actions were to reorganize the work area to address FME concerns and all openings on the new scram solenoid valves were covered.

The responsible individuals for each of these examples were disciplined for violating FME requirements. A memo was sent to Maintenance Department Personnel about procedure adherence requirements. The FME training was standardized at all Commonwealth Edison Company (CECo) sites. FME was discussed in more detail at pre-job briefings. In addition, more specific FME training was given to the maintenance staff.

The Dresden site completed an Administrative Procedure Noncompliance Root Cause Analysis and Human Performance Trend Investigation Team Evaluation with numerous corrective actions to improve overall site procedure adherence problems.

The inspector reviewed six months of PIFs for FME problems. The corrective actions for this violation were effective in significantly reducing the number of times that plant staff did not follow FME procedure requirements. In addition, there was an increased amount of monitoring of FME controls in the plant. These three examples of this violation are closed.

E8.15 (Closed) Violation 50-237/249/97007-03d(DRS): This violation was issued for failure to follow the procedural requirement that thermo-luminescent dosimeter (TLDs) be placed in the protective clothing pocket with the Beta window not covered.

Corrective actions included a tailgate meeting to ensure personnel would follow TLD placement requirements. Nuclear General Employee Training (NGET) and refresher training were verified to include the requirement for placement of personal dosimeters. In addition, the radiological protection staff ensured that this requirement was met.

The corrective actions for this violation were effective. This item is closed.

E8.16 (Closed) Unresolved Item 50-237/98012-01(DRS): This unresolved item was written to document the error that occurred in replacing the wrong reactor head closure stud. Closure studs 52 and 81 had Ultrasonic Testing (UT) indications and were to be replaced. However, studs 52 and 91 were replaced with new studs.



The licensee performed an analysis with a simulation that the flawed stud was not installed and demonstrated that a General Electric (GE) analysis bounded this condition. The evaluation was submitted to the NRC's Office of Nuclear Regulation (NRR) for review. NRR concurred that this analysis was acceptable. The licensee wrote WR 980038717 to remove and replace stud 81 during D2R16. The work package reviser was counseled. Training was provided to the work analysts on certain aspects of ASME Section XI work package preparation.

The inspector was satisfied with the licensee's corrective actions. This problem was not a violation because it was licensee identified and analyzed prior to operating the reactor and had very little safety significance. This Unresolved Item is closed.

E8.17 (Closed) Violation 50-237/249/98023-01(DRS): This violation was issued for problems with the control of temporary modifications (temp alts).

The NRC concluded in Inspection Report 50-237/245/98023 that information regarding the reasons for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved was adequately addressed. This report documented that no additional actions were needed. This violation is closed.

#### **V. Management Meetings**

##### **X1 Exit Meeting Summary**

The inspectors presented the inspection results to members of the licensee's management at the conclusion of the inspection on January 27, 1999. The licensee acknowledged the findings presented. No proprietary information was identified.

## PARTIAL LIST OF PERSONS CONTACTED

### Licensee

G. Abrell, NRC Coordinator  
B. Speck, Nuclear Oversight Assessor  
D. Spencer, System Engineer, Electrical Supervisor  
R. Nelson, System Engineer, EDG System Engineer  
R. Kelly, NRC Coordinator

### NRC

K. Riemer, Senior Resident Inspector  
D. Roth, Resident Inspector  
B. Dickson, Resident Inspector

## ITEMS OPENED, CLOSED, AND DISCUSSED

### Closed

50-237/249/97009-01	VIO	Improper Storage of Boric Acid and Borax.
50-237/249/98009-04	VIO	Fire Door Blocked Open Without a Fire Watch.
50-237/249/98005-02	VIO	Medical Documentation for Licensed Operator Not Maintained.
50-237/249/97028-03	VIO	Hose Not Taped or Secured by Contamination Area Boundary.
50-249/97027-01	VIO	Lost Radiographic Record for Pipe Weld.
50-237/249/98005-01	VIO	Inadequate Procedure for Starting and Stopping an EDG.
50-237/249/98003-01a	VIO	Inadequate Surveillance Calibration Procedure.
50-237/249/98003-01b	VIO	Work Request with Incorrect Coil Installed in EDG
50-237/249/98003-01c	VIO	Inadequate Work Instruction Not Check Pump Rotation.
50-237/249/98003-01d	VIO	Scaffolding Erected in Contact With a Valve.
50-249/98021-01	VIO	Move Irradiated Fuel With Inoperable RCU.
50-237/249/97028-02	VIO	Supervisor Manipulated a Switch Without a Procedure.
50-237/249/98013-02	VIO	Potential Bypass of Containment Pressure Suppression Function.
50-237/249/97007-03a	VIO	Failure to Follow FME Procedures.
50-237/249/97007-03b	VIO	Failure to Follow FME Procedures.
50-237/249/97007-03c	VIO	Failure to Follow FME Procedures.
50-237/249/97007-03d	VIO	TLD Beta Window Covered.
50-237/98012-01	URI	Wrong Reactor Head Closure Stud Replaced.
50-237/249/98023-01	VIO	Control of Temporary Modifications.

## LIST OF ACRONYMS USED

ACE	Apparent Cause Evaluation
CECo	Commonwealth Edison Company
ComEd	Commonwealth Edison
DAP	Dresden Administrative Procedure
DFPP	Dresden Fire Protection Procedure
DIS	Dresden Instrument Surveillance
DMP	Dresden Maintenance Procedure
DMS	Dresden Maintenance Surveillance
DOP	Dresden Operating Procedure
DOS	Dresden Operations Surveillance
DRP	Division of Reactor Projects
DRS	Division of Reactor Safety
EDG	Emergency Diesel Generator
EMD	Electrical Maintenance Department
FME	Foreign Material Exclusion
GE	General Electric
HPCI	High Pressure Coolant Injection
LCO	Limiting Condition of Operation
LER	Licensee Event Report
MARC	Management Action Response Checklist
MCC	Motor Control Center
NGET	Nuclear General Employees Training
NRR	Office of Nuclear Regulation
NSWP	Nuclear Station Work Procedure
NTS	Nuclear Tracking System
PIF	Problem Identification Form
Q&SA	Quality & Safety Assessment
RCU	Refrigeration Control Unit
SRO	Senior Reactor Operator
TS	Technical Specification
Temp alts	Temporary Alterations/Modifications
TLD	Thermo luminescent Dosimeter
WEC	Work Execution Center
URI	Unresolved Item
UT	Ultrasonic Testing
VIO	Violation
Vdc	Direct Current Voltage

## LIST OF DOCUMENTS REVIEWED

- NTS 237-100-97-028-0001, "Tailgated Procedure Adherence Information to Maintenance Personnel"
- NSP-AP-1004, Revision 1, "Corrective Action Program Process"
- CWPI-NSP-AP-1-1, Revision 0, "Corrective Action Program Process Manual of Common Work Practice Instructions-Instruction 1 Event Response Guidelines"
- NSP-AP-2004, Revision 1, "Corrective Action Program Process Roles and Responsibilities"
- NSP-AP-4004, Revision 0, "Corrective Action Program Procedure"
- NTS 237-100-97-028-0001, "Comments on Use of Conditions Met to Denote Verification of Prerequisites"
- NTS 237-100-97-028-0002, "Maintenance Procedure Adherence"
- NTS 237-100-97-028-0002A, "Work Management Planning Process Review"
- NTS 237-100-97-028-0302, "Revise DRS 5721-06, To Give Direction Regarding Change Area Requests and if Hoses Will be Crossing Boundaries"
- NTS 237-100-97-028-0303, "Issue Letter to MBWA Participants to Make Them Aware of the Need to Improve Management Field Oversight of Hoses Used in the Field"
- NTS 237-100-97-028-0304, "Give Tailgate to Radiation Workers Regarding Proper Marking of Hoses Crossing Radiological Boundaries"
- NTS 237-100-97-028-0305, "Performance Monitoring Program Forms for Identification and Correction of Human Performance Errors in the Field"
- NTS 237-225-98-03901, "On Line Maintenance Process"
- NTS 237-200-98-00104, "Evaluate Utilizing Sign-offs in Work Packages for like-for-like Parts Replacements"
- NTS 249-200-96-02509A, "Maintenance Standards Review and Improvement Following D3R14"
- NTS 237-200-98-00101, "DMS 6600-02 Revision for Pump/Motor Rotation Check"
- NTS 237-200-98-00103, "Establishment of Record Filing System for Walkdown Checklist"
- NTS 249-200-96-02504A, "Implement FME Pre-job Briefing"
- NTS 237-100-97-00101, "Implement a Scorecard Process"
- NTS 249-200-96-02503B, "Contractor Training and Certification in FME"
- NTS 237-200-97-03601, "Generate a Station Predefine to Change Out Alt SBLC Containers on a 5 Year Rotation"
- NTS 237-200-97-03603, "DOS 0010-15 Will be Revised to Incorporate Canister Integrity and Seal Inspection by Operations"
- PIF # D1998-05203, "During E&TS Inspection Several PIFs Identifying Issue WRT Control of Temp Mods"
- PIF # D1998-04879, "Nuclear Oversight Identifies RP Discrepancies in Chemical Cleaning Building"

- PIF # D1998-05742, "Nuclear Oversight Identifies Discrepancies in Radwaste Building"
- PIF # D1998-06105, "Nuclear Oversight Identifies Discrepancies in Unit 1 Fuel Building"
- PIF # D1999-00059, "NRC Identifies RP Issues in U3 Torus Basement"
- PIF # D1998-02724, "Wrong Reactor Head Stud Removed From Unit 2 Reactor Vessel Flange"
- Dresden Nuclear Power Station, Unit 2 Reactor Pressure Vessel Head Stud Flaw Evaluation Report, Revised , June 19, 1998.
- Dresden Nuclear Power Station, Unit 2 Reactor Pressure Vessel Head Stud Flaw Evaluation Report, April 14, 1998.
- PIF # D1998-01551, "Two Reactor Head Studs Have Indications Exceeding NDT-C-50"
- CAR # 12-98-022, "Medical Certification"
- Reply to Notice of Violation for NRC IR 50-237/249/98005, April 27, 1998.
- NTS 237-100-98-0030102, "Systems Collegial Review"
- NTS 237-100-98-0050101B, "Revise DOP 6600-02 and DOP 6600-05"
- NTS 237-100-98-0050101, "Review and Revise all EDG Procedures"
- DOP 6500-09, Revision 8, "Bus 24-1 to Bus 34-1 Tie Breaker Operation Utilizing U2(U3) D/G"
- DOP 6600-05, Revision 20, "Diesel Generator 2/3 Startup"
- DOP 6600-02, Revision 18, "Diesel Generator 2/3 Startup"
- Reply to Notice of Violation, July 25, 1997, Inspection Report 50-237/245/97007
- NTS 249-200-96-02504A, "Implement FME Pre-job Briefings"
- NTS 237-100-97-00703 A, B, & C "NRC Violation for FME Procedure DAP 03-23"
- NTS 237-100-97-00703D, "NRC Violation for Failure to Follow DAP 12-35.
- CAR 12-97-066, "Records Storage/Admin"
- Reply to Notice of Violation, January 12, 1988, NRC IR 50-249/97027
- Reply to Notice of Violation, May 18, 1998, NRC IR 50-237/249/98013
- NTS 237-230-98-00100, "Root Cause Analysis Report for Drywell to Suppression Pool Bypass Valves Open During Modes 2 & 3"
- NTS 237-230-98-00104, "Document, Track, and Respond to NRC Concerns"
- NTS 237-230-98-00108, "PIFs That Result in LESS Reviewed as OPEX Documents"
- NTS 237-230-98-00110, "Training module for Reportability Requirements"
- PIF # 1997-08598, "Failure of the U3 125v. Battery Charger - Unauthorized Equipment Manipulation"
- NTS 249-100-97-028-0200, "Failure of the U3 125v. Battery Charger - Unauthorized Equipment Manipulation"
- Reply to Notice of Violation, March 11, 1998, NRC IR 50-237/249/97028
- NTS 237-100-97-028, "Maintenance Procedure Adherence"
- NTS 237-100-97028-0002A, "Work Management Process Review"

- Reply to Notice of Violation, April 20, 1998, NRC IR 237/249/98003
- LER 98-012-00, "Fuel Bundle Movement Permitted During Control Room Ventilation Outage Due to Programmatic Failures Within the Work Planning and Execution Process"
- NTS 237-180-98-01203, "Tech Spec Knowledge Appraisal"
- Reply to Notice of Violation, October 26, 1998, NRC IR 50-237/249/98021
- NTS 237-180-98-01201, "A Review of Fuel Handling Procedures Performed to Determine Those Requiring Identification of Technical Specification LAOS"
- NTS 237-180-98-01202, "A review of Plant Procedures Performed to Determine Those Requiring Identification of Tech Specs"
- NTS 237-100-98-0090401, "Violation 50-237/249/98009-04"
- DFPP 4100-03, Revision 2, "Fire Watch Procedure"
- DFPP 4175-01, Revision 12, "Fire Barrier Integrity and Maintenance"
- Reply to Notice of Violation, June 9, 1998, NRC IR 50-237/249/98009-04
- NTS 237-100-98-0090401, "Revise DFPP 4100-03 and DFPP 4175-01"
- Reply to Notice of Violation, July 28, 1997, NRC IR 50-237/249/97009
- Memo to Operations Personnel, August 29, 1997, "Raising Our Standards"
- NTS 237-200-97-03603, "DOS 0010-15 Revised to Incorporate Canister and Seal Inspection Verification During Performance of the Surveillance"
- Reply to Notice of Violation, March 11, 1998, NRC IR 50-237/249/97028
- Reply to Notice of Violation, March 11, 1998, Inspection Report 50-237/249/97028.