

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos: 50-237/90006(DRS); 50-249/90005(DRS)

Docket Numbers: 50-237; 50-249

Licenses Number: DPR-19; DPR-25

Licensee: Commonwealth Edison

Facility Name: Dresden Nuclear Power Station, Units 2&3

Inspection At: Morris, Illinois

Inspection Conducted: February 5 - March 8, 1990

Inspector: V. P. Longheed
V. P. Longheed

3/28/90
Date

Approved By: Monte P. Phillips
Monte P. Phillips, Chief
Operational Programs Section

3/28/90
Date

Inspection Summary

Inspection on February 5 through March 8, 1990 (Reports No. 50-237/90006(DRS); 50-249/90005 (DRS))

Areas Inspected: Routine announced inspection by a regional based inspector in order to review the containment integrated leak rate test (CILRT) and local leak rate test (LLRT) procedures, review of the CILRT and LLRT test results, limited review of the engineering and technical support programs and closure of open items. Inspection modules used during this inspection were 37700, 41400, 61720, 70307, 70323, 91701 and 91702.

Results: The inspector found that the licensee had upgraded their training program to adequately resolve the concerns expressed by the Diagnostic Evaluation Team. The licensee had also resolved concerns with regard to modifying test acceptance criteria and attention to detail. The licensee's temporary modification program was a strength in that only a limited number of temporary alterations were open on both units, and less than five percent of those open were over six months old.

In regard to their leak rate testing program, the licensee identified several penetrations which required LLRTs but which had not been previously included

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in the program. These were tested during this outage. The licensee committed to complete a study to document the containment isolation valves (CIVS) and to define the testing required for these valves in order to show compliance with requirements. The licensee also committed to submitting this completed study to NRR for approval. Failure to perform LLRTs on these lines was a violation; however, because the licensee identified the violation, took prompt immediate corrective action, as well as long-term actions to prevent recurrence, the requirements of 10 CFR Part 2 Appendix C, Section V.G were met, and no violation was issued.

The inspector had several concerns in regard to the testing methodology used for the LLRTs. These were discussed with the licensee, including discussions held in the region. The licensee committed to revise the methodology used to perform the LLRTs, and to make changes to their CILRT procedure in regard to documentation of valve lineups and proper venting and draining of lines prior to their next CILRT, scheduled for October 1990 on the other unit at the site.

A violation was identified for failure to include in a procedure the requirement to isolate the valves for the service air system prior to the CILRT. The licensee stated that they had verified that the line was closed but did not document this.

An unresolved item was identified in regard to some quarter inch pneumatic lines which penetrate containment. The licensee did not perform LLRTs on these lines and stated that they were instrument lines, and, as such, exempt from the requirement to perform LLRTs. However these lines were pneumatic lines to dampers inside containment; and were not connected to any instrumentation. The licensee agreed to include these lines in the submittal to NRR and that the need to perform LLRTs would be based on NRR's review and acceptance of the licensee's submittal.

Appendix J imposes a limit of .75La for the CILRT, and .6La for the total LLRTs. The as-found (beginning of outage) leak rates for both tests exceeded the allowables. Since the as-found CILRT was above the acceptance criteria, the licensee must obtain approval of their next CILRT schedule from the Commission (per Appendix J).

DETAILS

1. Persons Contacted

Commonwealth Edison

- *G. Bergan, On-site Nuclear Safety
- L. DeCarlo, Training
- *E. Eenigenburg, Station Manager
- *R. Falbo, Regulatory Assurance
- +*J. Geiger, Tech Staff, (CILRT Test Lead Engineer)
- *L. Gerner, Technical Superintendent
- +*J. Glover, Nuclear Engineering Division
- *J. Harrington, Quality Assurance
- +*M. Horbaczewski, Tech Staff (CILRT Test Director)
- *J. Ketowski, Production Superintendent
- *K. Peterman, Regulatory Assurance Supervisor
- *M. Strait, Tech Staff Supervisor

U. S. NRC

- S. DuPont, Senior Resident Inspector
- *D. Hill, Resident Inspector

- *Attended exit interview held February 23, 1990
- +Attended in-region meeting held February 27, 1990

The inspector also interviewed other licensee employees during the course of the inspection, including members of the operations and technical staff.

2. Licensee Action on Previously -Identified Findings

- a. (Closed) Open Item (237/88017-30): "DET Items 2.2.4.1, 2.2.4.2, 2.2.4.3, 2.2.4.5. and 3.4.2 on Inadequate Training Program." The inspector reviewed the licensee's training program interviewed training personnel, and attended a session of the continuing non-licensed operator training program. The inspector determined that the training program for non-licensed personnel was adequate. This item is considered closed.
- b. (Closed) Violations (237/88025-01) and (249/88027-01): "Failure to Carry Out Design Assumptions on a Safety Related Modification (250 VDC Batteries". The licensee revised procedure DAP 5-1, Rev 19 to ensure that design assumptions are properly translated to the field. These items are considered closed.

- c. (Closed) Violations (237/88025-02) and (249/88027-02): "OAD Failure to Obtain Approval from BWRED Prior to Changing the Acceptance Criteria of 250 VDC & 125 VDC Battery Construction Tests". The licensee revised procedure DAP 5-1 to caution that any changes to BWRED acceptance criteria must be coordinated with BWRED prior to making the change. This was verified during the inspection, as discussed in section 3.b. These items are considered closed.
- d. (Closed) Open Item (237/88025-03): "Obvious Errors on the Modification Packages Issued by the Staff Reviewers." Based on the modifications reviewed, the licensee had increased their level of attention to detail, as no errors were discovered. This item is considered closed.
- e. (Closed) Open Items (237/88025-04) and (249/88027-03): "Document Control Should Always Inform Personnel Requesting a Controlled Drawing of All Outstanding ECNs, FCRs, etc." When the inspector requested drawings on the modifications reviewed, the licensee informed the inspector that there were outstanding revisions on some of the drawings, and identified the outstanding work. These items are considered closed.
- f. (Closed) Open Items (237/88025-05) and (249/88027-04): "Procurement Inspection and Dedication of Commercial Grade Components to Regulatory Grade or Safety Related Grade Must be Improved to Meet Generic Letter 89-02". The licensee had made a corporate commitment to improve their procurement process for commercial grade items by January 1, 1990. The licensee had revised their procedures for handling of commercial grade items. Due to the increased efforts made on a corporate basis in this area, these items are considered closed.
- g. (Closed) Open Item (249/86009-04): "Deficiency 2.1-4 from SSOMI: Failure to Assure for Reactor Water Cleanup Leak Detection System that the Documented Basis for the Temperature Trip Setpoint Reflected Actual Conditions." This item is being tracked by NRR as TAC item 63971. It is closed for Region III tracking purposes.
- h. (Closed) Open Item (249/88027-05): " Failure to Follow Procedure: Reactor Building Material Interlock Inner Door Opened and Left Unattended." The licensee took the following immediate steps: (1) Closure of the door, and (2) Permanent posting of a sign instructing that the door was not to be left open. Other corrective actions included revising the pertinent procedures (Dresden Administrative Procedures (DAP) 13-3, Rev. 1, "Unit 2 Reactor Building Trackway Interlock Door Access Control (At the Reactor Building Railroad Door)" and DAP 13-14, Rev. 2, "Unit 3 Reactor Building Material Interlock Access Control (Unit 3 Reactor Building Material Interlock Inner Door)" to eliminate any ambiguity about the door's status. The inspector toured the reactor building and reviewed the procedures. The licensee's actions were considered to be adequate. This item is considered closed.

3. Review of Modification Packages (92702, 37700)

a. Procedures

The inspector reviewed the following licensee procedures, in regard to the modification and commercial grade procurement program, and determined that they were acceptable:

DAP 5-1, Rev. 19, "Plant Modification Program"

DAP 7-4, Rev. 11, "Control of Temporary System Alterations"

DAP 10-2, Rev. 2, "Title 10 of the Code of Federal Regulations Part 50.59, Review Screening and Safety Evaluations"

DAP 11-5, Rev. 8, "Classification of Non-Safety-Related Subcomponents/Parts Used ON/IN Safety-Related Systems, Structures, and Components."

DAP 11-6, Rev. 7, "Request for Purchase Preparation"

DAP 11-7, Rev. 3, "Technical Evaluation of Parts Used in Safety-Related or Environmentally Qualified (EQ) Components"

DAP 11-15, Rev. 0, "Acceptance Testing of Electrical Commercial Grade Items for Use in Safety-Related Applications"

DAP 11-19, Rev. 1, "Dedication of Commercial Grade Items for Safety-Related Applications"

DAP 11-24, Rev. 1, "Receiving Instructions"

b. Modifications

- (1) Modification M12-3-87-43: "Install Signal Isolators on the Reactor Protection System (RPS)." This modification added Class 1E isolators to the RPS in order to isolate the non-safety related recorders from the safety related Neutron Monitoring System.

The inspector reviewed the modification package. As part of the package, the inspector noted that the licensee, in accordance with DAP 5-1, had notified BWRED that the acceptance criteria to the construction tests needed revision prior to performing the test. The inspector concluded, based on this review, that the licensee had resolved the concerns listed in Open Items 237/88025-02 and 249/88027-02.

- (2) Modification M12-3-87-39: "Automatic Blowdown System (ABS) Time Delay Relay Replacement." This modification replaced the time delay relays which were used to initiate the ABS. The old relays, GE Type CR120K, were susceptible to drifting. The new relays, Agastat ETR14D3G, had a better accuracy and response time.

The inspector reviewed the modification package, including the 50.59 safety evaluation, and installation and testing documents, and determined that they were acceptable.

- (3) Modification M12-3-86-24H: "Detailed Control Room Design Review (DCRDR) Human Engineering Deficiencies (HED)" Resolution Core Spray System Panel Rearrangement. This was one of a number of partial modifications which redesigned the Main Control Room Boards in order to resolve human factor concerns over the layout of the control room boards. This particular partial modification moved indicators and controls for the core spray system.

The inspector reviewed the modification package, including the installation and testing packages. The inspector determined that the packages were acceptable.

- c. Temporary Alterations: The inspector reviewed the licensee's temporary alterations. The inspector noted that the licensee had made a concerted effort to limit the number of outstanding temporary alterations, in that there were less than 40 temporary alterations for both units. The inspector also noted that the majority of the temporary alterations were less than six months old. Safety evaluations were properly completed on all the temporary alterations reviewed. This area appeared to be a strength for the licensee.

4. Review of Containment Integrated Leak Rate Test Procedure (70307)

a. Procedure Review

The inspector reviewed surveillance instruction DTS 1600-7 "Unit 2/3 Integrated Primary Containment Leak Rate Test, Revision 9, dated February 1990, relative to the requirements of 10 CFR 50, Appendix J; ANSI N45.4-1972; and the licensee's Technical Specifications. This review was done following the CILRT. The inspector identified several valve lineup problems within the procedure. The licensee committed to revise the procedure prior to the next CILRT, in October 1990.

b. Review of Valve Lineups

The inspector reviewed and discussed the valve lineups for the CILRT with the licensee. The main concerns were the clean demineralized water system and the service air system, as the valve lineups for these systems were not included in the CILRT procedure. The licensee

stated that the systems were isolated, however this was not documented in a specific checklist. The licensee also stated that the service air system was in service (air compressor on) during the CILRT and that the line was not vented downstream of the CIV. (The licensee properly added a penalty to the CILRT results for failure to vent this line. However the inspectors considered requiring imposition of a double penalty since the compressors not only would have prevented air from leaking out but may have added air to the containment. Review of the CILRT results with this additional penalty did not change the overall conclusions.)

The failure to have the valve lineups prescribed by procedures constitutes a violation of 10 CFR Part 50 Appendix B, Criterion V which requires that activities affecting quality be prescribed by instructions, procedures, or drawings and be accomplished in accordance with these procedures. (500249/90005-01(DRS)).

The inspector spot verified that the remainder of the penetrations were, by the procedure, in the proper post-accident lineup. The inspector had questions on some small diameter pneumatic lines which penetrated containment but were not type C tested. The licensee originally stated that these lines were instrument lines; however, it was agreed that further review of these lines was necessary since they were not connected to any instruments. These lines were to be included in the licensee's study on the requirements for CIVs. Upon completion, the licensee agreed to submit this study to NRR for approval. The status of these lines (as to whether an LLRT is required) has been left as an unresolved item, pending submission of the study and acceptance by NRR. (50249/90005-02(DRS)).

c. Clarification of Appendix J Requirements

To ensure the licensee's understanding of Appendix J requirements, and other applicable requirements, the inspector conducted numerous discussion with licensee personnel during the course of the inspection. The following clarifications were provided in order to ensure the licensee's understanding of Appendix J: Item (1) was revised in order to remove some conservatism; Item (2) was repeated because of problems encountered in this area; Item (3) was previously discussed with the licensee, and is formally documented here; and Items (4) and (5) were discussed with the licensee during the exit meeting.

- (1) Periodic Type A, B, and C tests must include as-found results as well as as-left. If Type B and C tests are conducted prior to a Type A, the as-found condition of the containment must be calculated by adding any improvements in leakage rates, which are the results of repairs and adjustments (RA), to the Type A test results using the "minimum pathway leakage" methodology. This method requires that:

- (a) In the case where individual leak rates are assigned to two valves in series (both before and after RA), the penetration through leakage would simply be the smaller of the two valves' leak rates.
 - (b) In the case where a leak rate is obtained by pressurizing between two isolation valves, and the individual valve's leak rate is not quantified, the as-found and as-left penetration through-leakage for each valve would be 50% of the measured leak rate if both valves are repaired.
 - (c) In the case where a leak rate is obtained by pressurizing between two isolation valves and only one valve is repaired, the as-found penetration leak rate shall be taken as either the final measured leak rate or the difference between the measured as-found and as-left leak rate, whichever is smaller. In either case, the as-left Leak rate would be zero.
- (2) Penetrations which are required to be Type C tested as described in the FSAR, the SER, or the Technical Specifications, must be vented inside and outside the containment during the CILRT. All vented penetrations must be drained of water inside the containment and between the penetration valves to ensure exposure of the containment isolation valves to containment air test pressure. The degree of draining of vented penetrations outside of containment is controlled by the requirement that the valves be subjected to the post-accident differential pressure, or proof that the system was built to stringent quality standards comparable to those required for a seismic system.
 - (3) The periodic retest schedule for each penetration subject to Type B or C testing, except for airlocks and penetrations employing a continuous leakage monitoring system, shall be every refueling outage, but in no case shall the interval be greater than two years.
 - (4) All air sources left inside containment during a CILRT shall be vented to atmosphere during the test. If they are not vented, then they shall be monitored. The CILRT penalty taken shall take into account the readability and sensitivity of the monitoring instrumentation. If the air sources are neither vented or monitored, the penalty added to the CILRT results shall assume that the air source went from its design pressure to the test pressure during the course of the test.
 - (5) When determining the results of the Type B and C tests, the minimum readability accuracy and sensitivity of the

instrumentation used shall be accounted for. No leakage rates shall be reported as zero, but shall rather be reported as the minimum discernible value.

5. Test Results Evaluation (70323)

a. CILRT Data Evaluation

A 7 1/2 hour CILRT was performed during February 4, 1990, at 62.7 psia following satisfactory completion of the required temperature stabilization period. Data was collected every 10 minutes. The inspector independently evaluated leak rate data using total time (BN-TOP-1) formulas to verify the licensee's calculations of the leak rate and instrument performance. There was good agreement between the inspector's and licensee's results as indicated by the following summary (units are in weight percent per day).

<u>Measurement</u>	<u>Licensee</u>	<u>Inspector</u>
Leak rate measured during CILRT (Lam)	0.704	0.704
Lam at upper 95% confidence level	0.769	0.770

Appendix J acceptance criteria at 95% UCL: $<0.75 \text{ La} = <1.2 \text{ wt\%/day}$.

At the completion of the CILRT and the supplemental test, the licensee was required to make corrections to the calculated Lam at the 95% UCL due to changes in volume of various water sources inside containment, as well as changes due to non-vented air sources inside containment. The following correction to Lam were recorded and calculated by the licensee.

<u>Water Source</u>	<u>Change in Volume</u>
Equipment Drain Sump	39 cuft;
Floor Drain Sump	4.5 cuft;
Total:	43.5 cuft

Leakage, due to increase in sump levels, was 0.048 wt%/day.

<u>Air Source</u>	<u>Change in Pressure</u>
MSIV Accumulators (4)	52 psi

Leakage, due to air sources, was 0.008 wt%/day.

Total increase in leakage at the 95% UCL was 0.056 wt%/day for a total of 0.826 wt%/day. This is below the acceptance criteria of 1.2 wt%/day.

b. Supplemental Test Data Evaluation

After the satisfactory completion of the CILRT, a known leakage rate of 783 scfh, equivalent to 1.54 wt%/day was induced. Data was collected and analyzed by the licensee every 10 minutes. The inspector independently evaluated leak rate calculations using the data submitted by the licensee, including the post test calibration of the flowmeter, to verify the licensee's results. After 4.167 hours, the supplemental test was terminated with satisfactory results as indicated by the following summary (units are in wt%/day). The results were stable within the acceptance criteria.

<u>Measurement</u>	<u>Licensee</u>	<u>Inspector</u>
Measured leakage rate, Lc, during supplemental test	2.263	2.263
Induced leakage rate, Lo	1.520	1.539
Lc - (Lo + Lam)	0.039	0.020

Appendix J acceptance criteria $-0.400 < [Lc - (Lo + Lam)] < 0.400$

c. CILRT Valve Lineup Penalties

Due to valve configurations which deviated from the ideal penetration valve lineup requirements for the CILRT, the results of LLRTs for such penetrations must be added as a penalty to Lam at the 95% UCL. The following penalties were added using the "minimum pathway leakage" method:

<u>Penetration (System)</u>	<u>Local Leak Rate Test Value</u> (Units are in SCFH)
X-101 (Personnel Airlock)	0.30
X-107A&B (Feedwater)	15.18
X-109A (Isolation Condenser)	0.53
X-111A&B (Shutdown Reactor Cooling)	53.77
X-113 (Reactor Water Cleanup)	0.83
X-116A&B (Low Pressure Coolant Injection (LPCI) to Containment)	} 16.42
X-145, 150A (LPCI to Core)	
X-310A&B (LPCI Test Line)	

X-311A&B (LPCI to Suppression Pool Spray)	
X-119 (Clean Demineralized Water)	2.49
X-120 (Service Air)	3.49
X-122 (Reactor Water Sample)	0
X-138 (Standby Liquid Control)	5.24
X-149A&B (Core Spray)	1.13
X-317 (High Pressure Coolant Injection Turbine Exhaust Line)	0

Total Type C Leakage Penalty: 99.38
(or 0.195 wt%/day)

After taking these local penalties into account, the final upper 95% confidence value for containment leakage was equal to 1.021 wt%/day, which is within the acceptable value of < 1.2 wt%/day. Addition of a "double penalty" for the service air system raises the leakage rate to 1.027 wt%/day, which is still acceptable.

d. As-Found Condition of Containment

The as-found condition is the condition of the containment at the beginning of the outage prior to any repairs or adjustments to the containment boundary. The inspector reviewed the licensee's summary of the containment penetration LLRTs (Type B and C) performed prior to the CILRT in order to determine the amount of leakage rate improvement due to repairs or adjustments. Based on the results reviewed, the inspector determined that the amount of the leakage improvement prior to the CILRT equalled 123.91 scfh, or the equivalent of 0.244 wt%/day. Based on this, the as found containment leakage rate, at the 95% UCL, was 1.265 wt%/day.

The containment was considered to have failed the as-found periodic CILRT.

6. Review of Local Leak Rate Testing (Type B and C) Program (61720)

a. Procedures

The inspector reviewed the following procedures in regard to the licensee's LLRTs:

- (1) DAP 14-5 "Leak Rate Testing Program," Revision 2, including Temporary Change Number 90-103;
- (2) DTS 250-1 "Main Steam Isolation Valve Local Leak Rate (Dry) Test," Revision 8;

- (3) DTS 1600-1 "Local Leak Rate Testing of Primary Containment Isolation Valves," Revision 13;
- (4) DTS 1600-2 "Local Leak Rate Test Procedure - Bellows Seal Penetrations," Revision 6;
- (5) DTS 1600-4 "Local Leak Rate Testing for Electrical Penetrations," Revision 8;
- (6) DTS 1600-4 "Local Leak Rate Testing for Electrical Penetrations," Revision 8;
- (7) DTS 1600-9 "Augmented ASME Section XI Leakage Rate Testing," Revision 0;
- (8) DTS 1600-14 "Local Leak Rate Testing of Personnel Access Lock," Revision 8;
- (9) DTS 1600-15 "Local Leak Rate Testing of Double Gasketed Seals," Revision 7

The inspector had several comments on these procedures, mainly in regard to a correction factor used by the licensee to correct the leakage rates back to design pressure. This is discussed further in Section 6.c below.

b. Newly Identified Penetrations

As a result of a study performed at another site of the licensee's, the licensee identified three penetrations which should have been local leak rate tested, but which had not previously been tested. During this outage, the licensee tested at least one valve in each line (testing was limited by lack of test connections), and the leak rates were acceptable. The licensee committed to perform a study to ensure that all other penetrations have received required testing and that the valves would be properly tested in future outages. 10 CFR Part 50, Appendix J, Section III.C requires testing of containment isolation valves. Failure to test these valves during previous outages was a violation of the above requirement. However, since the licensee identified the item, reported it, took appropriate corrective action as well as long-term actions to prevent recurrence, this violation meets the criteria of 10 CFR Part 2, Appendix C Section V.G for non-cited violations. Therefore, no notice of violation will be issued.

c. Correction Factor

During this outage, the licensee used the pressure decay method for determining the local leak rates. This method interprets a change in pressure as being indicative of the leak rate. Use of this method resulted in average test pressures which were higher or lower

than the accident pressure ($P_a=48$ psig). Since 10 CFR 50 Appendix J requires that CIV testing be performed at P_a , the licensee corrected the leak rates from test pressure to P_a through a correction factor described in their test procedure.

While use of this correction is conservative for test pressures less than P_a , in that it raises the leak rate from what was measured, Appendix J does not allow for extrapolation to P_a for local leak rate tests. Additionally, use of a correction factor in the downward direction (from a test pressure higher than P_a) is non-conservative since a CIV which was leaking through the seat might have a lower leak rate at the higher pressure than it would at P_a . Use of a correction factor in lieu of testing at P_a was a violation of the requirements of Appendix J Section IIIC.2.a. During a meeting in the regional offices held February 27, 1990, the licensee provided information on the derivation of the correction factor. The licensee also stated that they had incorrectly applied the correction factor in certain cases. Some lines had required pressurizing to an extremely high pressure (100 psig) in order to overcome back pressure in the line. The licensee originally correctly these lines down to test pressure, when in reality, the tests were conducted at test pressure. The revised numbers were given to the inspector, and were used in this report.

The inspector performed a calculation of the effects of the correction factor on the CILRT and LLRT results. Using non-corrected results did not increase the results past the third decimal place and were, therefore, deemed inconsequential for this test.

The licensee verbally committed to revising their procedures to use the flow makeup testing method. The licensee stated that if the pressure decay method was used in the future (such as for very large volumes), then a limit of 4% of P_a would be placed on the pressure, and the correction factor would not be used. The use of the pressure decay method in this manner was acceptable to the inspector.

Based on the information provided, the revised numbers, and the licensee's commitment to switch to the flow makeup method, the requirements of 10 CFR 2 Appendix C Section V.A have been met and no violation will be issued.

d. Local Leak Rate Test Results

The licensee's Technical Specifications require that the total of the LLRTs, when calculated by the maximum pathway method and

exclusive of the Main Steam Isolation Valves, be less than 0.6La, which is equivalent to 608.84 scfh. The as-found LLRT total was 3411.09 scfh or ~4La. The final as-left LLRT total was 470.56 scfh, or 0.58La. This high value for the as-left LLRTs was discussed with the licensee. The licensee stated that this was a management decision in order not to extend the outage. The inspector reminded the licensee that leaving this small a margin to their administrative limit for LLRTs may impose operability constraints during the next cycle if future tests during the outage raised the total above 0.6 La. The licensee acknowledged this warning.

7. Unresolved Items

Unresolved items are matters which have been discussed with the licensee and which require further action on the part of either the licensee or the NRC. An unresolved item, requiring action on the licensee's part, was discussed in Paragraph 4.b of this report.

8. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) throughout the inspection. An exit meeting was held prior to leaving the site. Following review of all data submitted by the licensee an additional exit meeting conducted by telephone on March 8, 1990. The inspector summarized the scope and findings of the inspection. The licensee acknowledged these findings. The inspector also discussed the likely informational content of the inspection report with regards to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.