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SUCLEAR REG	UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30323		
Re	port Nos.: 50-280/93-14 and 50-281/93-14		
Li	censee: Virginia Electric and Power Company Glen Allen, VA 23060		
Do	cket Nos.: 50-280, 50-281 Licen	se Nos.:	DPR-32, DPR-37
Fa	cility Name: Surry Power Station		
In	spection Conducted: June 7-11, 1993		
In	spector: <u>Annes</u> <u>Kulu</u> J. L. Kreh, Badiation Specialist		7 - 8 - 93 Date Signed
Ap	proved by: K. P. Barr, Chief		$\frac{7/9}{93}$ Date Signed
	Emergency Preparedness Section		
	Radiological Protection and Emergency Prep	aredness	Branch
	Division of Radiation Safety and Safeguard	S	

SUMMARY

Scope:

This routine, announced inspection was conducted to assess the operational readiness of the site emergency preparedness program, and included selective review of the following programmatic areas: (1) Emergency Plan and associated implementing procedures; (2) facilities, equipment, instrumentation, and supplies; (3) organization and management control systems; (4) training; and (5) independent and internal audits and reviews.

Results:

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In the areas inspected, no violations or deviations were identified. Program strengths included overall management control of the emergency planning effort, a comprehensive system of surveillances of emergency response facilities and equipment, and independent audits. Several concerns were identified during the inspection and are discussed in detail in Paragraph 5. These were resolved by the licensee through timely and appropriate corrective actions.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *W. Benthall, Supervisor, Licensing
- *E. Collins, Director, Nuclear Emergency Preparedness (Corporate)
- *J. Costello, Station Coordinator, Emergency Planning
- *A. Friedman, Superintendent, Nuclear Training
- M. Gabriele, Assistant Shift Supervisor
- W. Henry, Shift Supervisor
- R. Kulp, Coordinator, Emergency Planning
- T. Kunkle, Assistant Shift Supervisor
- *H. McCallum, Supervisor, Operations Training
- *J. McCarthy, Superintendent, Operations
- W. Moore, Assistant Shift Supervisor
- *A. Price, Assistant Station Manager, Nuclear Safety and Licensing
- M. Small, Assistant Shift Supervisor
- *E. Smith, Jr., Manager, Quality Assurance
- *S. Wood, Senior Instructor, Nuclear Training

Other licensee employees contacted during this inspection included operators, instructors, engineers, auditors, security force members, and administrative personnel.

Nuclear Regulatory Commission

*M. Branch, Senior Resident Inspector S. Tingen, Resident Inspector

*Attended exit interview on June 11, 1993

2. Emergency Plan and Implementing Procedures (82701)

This area was inspected to determine whether significant changes were made in the licensee's emergency preparedness program since February 1992 (the date of the last such inspection of this area), to assess the impact of any such changes on the overall state of emergency preparedness at the facility, and to determine whether the licensee's actions in response to actual emergencies were in accordance with the Emergency Plan and its implementing procedures. Requirements applicable to this area are found in 10 CFR 50.47(b)(16), 10 CFR 50.54(q), Appendix E to 10 CFR Part 50, and the licensee's Emergency Plan.

The inspector reviewed the licensee's system for making changes to the Emergency Plan and the EPIPs. Through selective review of applicable documents, the inspector confirmed that licensee management approved revisions to the Emergency Plan and EPIPs as required. Copies of the Emergency Plan, EPIPs, and Emergency Telephone Directory which were available for use at the TSC and LEOF were checked and found to be current revisions.

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The inspector reviewed all licensee records regarding the transmittal of EPIP revisions to the NRC between March 1, 1992 and May 31, 1993. The records verified that each of the 39 EPIP revisions during that period had been transmitted to the NRC within 30 days of the implementation date, as required.

Since the aforementioned February 1992 inspection, the NRC has formally reviewed and approved Revision 34 to the licensee's Emergency Plan. The version of the Plan in effect at the time of the current inspection was Revision 35, dated September 11, 1992. The significant changes made in this revision were reviewed and discussed with the Station Coordinator, Emergency Planning. These included the incorporation of data from the 1990 census into the evacuation time estimates and population data shown in Tables 6.4a and 6.4b, the addition of TS release EALs for the licensee's Radwaste Facility, and clarification of the ATWT EALs for Alert and Site Area Emergency. The inspector's selective, preliminary review did not identify any decrease in the effectiveness of the licensee's Emergency Plan caused by these and other changes made in Revision 35. The NRC's formal review of Revision 35 changes will be the subject of separate correspondence.

Revisions to the EPIPs since February 1992 were discussed with the Station Coordinator, Emergency Planning. Various minor changes were made to upgrade and/or clarify the EPIPs, including several modifications to the EALs. Extensive modifications were made to the PAR scheme to address a finding from the 1992 exercise (see Paragraph 7.a). EPIP-3.03, "Activation of Operational Support Center," and EPIP 4.17, "Monitoring of Emergency Response Facilities," were revised to reflect the new location for the alternate OSC (further discussed in Paragraph 3). Since the Emergency Plan stated that an alternate OSC was designated but did not specify its location, no Plan change was necessary in this connection.

The inspector verified that current letters of agreement existed between the licensee and the 20 offsite support organizations listed in Appendix 10.1 to the Emergency Plan. The licensee renegotiated all the letters of agreement during 1992 (required once every two years by Section 5.3.3 of the Plan), replacing those dated 1990. Also verified through documental review was the licensee's conduct of the required annual review of EALs with governmental authorities, conducted on September 26, 1992. According to licensee documentation, this was accomplished by means of a presentation to 27 individuals representing governmental agencies and support organizations.

No violations or deviations were identified.

3. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

This area was inspected to determine whether the licensee's ERFs and associated equipment, instrumentation, and supplies were maintained in a state of operational readiness, and to assess the impact of any changes in this area upon the emergency preparedness program. Requirements

applicable to this area are found in 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(q), Section IV.E of Appendix E to 10 CFR Part 50, and the licensee's Emergency Plan.

The inspector toured the TSC, the OSC (both primary and alternate locations), and the LEOF. Selective examination of equipment and supplies indicated that an adequate state of operational readiness was being maintained for these ERFs.

At the inspector's request, the emergency ventilation system for the LEOF was actuated on June 8. The system was designed to develop positive pressure within the LEOF to restrict the infiltration of airborne radioactive material in the event of a severe reactor accident. A permanently installed instrument (manometer) in the LEOF provided a differential pressure measurement in inches of water gauge. The acceptance criterion specified in the licensee's surveillance test for the emergency ventilation system was 0.05 inch; the manometer reading rose to 0.15 inch within 15 seconds. During the February 1992 inspection, the LEOF emergency ventilation system did not function properly (see Paragraph 3 of NRC Inspection Report Nos. 50-280, 50-281/92-05). Licensee management agreed at that time to evaluate the reasons for the performance failure and to take appropriate corrective actions to preclude recurrence. The licensee tracked this commitment under CTS Item No. 1684. Review of the licensee's completed corrective actions, combined with the fully acceptable performance of the LEOF emergency ventilation system during the current inspection, indicated that the subject problem had been thoroughly addressed.

During the annual emergency response exercise in August 1991, scenario developments required the OSC to be evacuated and reestablished at the Unit 1 Emergency Switchgear Room, which was the designated alternate location for the OSC. NRC observers found the alternate OSC facility to be "poor," with a detailed basis for this conclusion provided in Paragraph 8.d of NRC Inspection Report Nos. 50-280, 50-281/91-25. Review of this facility during the February 1992 inspection resulted in the same conclusion. The licensee determined that a different location for the alternate OSC was needed, and tracked this matter as Licensing Issue No. 50713. In October 1992, the alternate OSC was officially redesignated as the ALARA Conference Room, located in the west end of the Service Building. Inspection of this facility disclosed no problems such as had been identified relative to the previous location. Status boards were present for tracking repair/damage control teams, automatic ringdown telephones to the TSC and Control Room were installed, and adjacent locker rooms served as personnel staging areas. A memorandum to all station personnel officially communicated this change in the designation of the alternate OSC, and applicable EPIPs were appropriately revised, as noted in Paragraph 2. The inspector concurred in the licensee's closure of this issue.

The inspector selectively reviewed completed documentation for each of the following facility/equipment surveillance procedures for the period March 1, 1992 through the date of the current inspection:

- 0-EPM-1415-03, LEOF Ventilation System Inspection (annual)
- O-EPM-1415-06, TSC Ventilation System Inspection (18 months or refueling)
- 0-HSP-EP-001, Emergency Plan Radiation Instruments and Emergency Kits Inspection and Checks (performed monthly)
- 0-LSP-CO-001, Monthly Emergency Communications Test
- 0-LSP-CO-002, Quarterly Emergency Communications Test
- 0-LSP-CO-003, Quarterly Health Physics Emergency Radio Communications Test
- 0-LSP-ERF-001, Emergency Response Facility Inventory (quarterly)
- 0-LSP-EW-001, Early Warning System Polling Function Test (semimonthly)
- 0-LSP-EW-002, Early Warning System Siren Activation Monitoring (quarterly)
- 0-MPM-0620-01, TSC and LEOF Ventilation System HEPA and Filter Test Documentation (annual)
- 0-OSP-VS-005, TSC Pressure Test (18 months or refueling)
- 0-OSP-VS-006, LEOF Pressurization Test (18 months or refueling)
- 0-MPM-0620-02, TSC Ventilation System Charcoal Filter Test Analysis Documentation and Verification (annual)
- EWS-E/M1, Emergency Warning System Maintenance (quarterly)
- STP-2.53, ERF and MIDAS Computer Systems (monthly)

The listed surveillance procedures had been performed at the required frequencies, and the documentation indicated that identified problems were corrected expeditiously.

On June 8, the inspector witnessed the performance of the semimonthly polling function test (also known as a "silent" test) of the EWS performed in accordance with procedure O-LSP-EW-001. The test was conducted from the LEOF and was monitored by the licensee's computer-based feedback system. Three of the sirens were unresponsive to the initial poll. As allowed by the referenced procedure, the test was repeated, resulting in an acceptable response from all 61 sirens

comprising the EWS. On June 9, a scheduled, quarterly full-cycle test of the EWS, conducted in accordance with procedure O-LSP-EW-002, was observed by the inspector from the LEOF, where the feedback system allowed for essentially instantaneous monitoring of EWS performance.

The sirens were activated from the Surry County Office of Emergency Services. According to monitoring system information at the LEOF, all EWS sirens actuated successfully, and no operational anomalies of any kind were detected.

The licensee's "1992 EWS Operability Report," as provided to FEMA through the State, showed the average siren availability factor for calendar year 1992 to be 99.5%. This calculation included the results of the semimonthly silent tests, the quarterly growl tests, and the quarterly full-cycle tests.

Based upon ERF walk-downs, observation of licensee activities, review of changes to the EPIPs, inspection of completed surveillance procedures, and statements by licensee representatives, the inspector concluded that no degradation of ERF capabilities had occurred since the NRC inspection of this program area in February 1992.

No violations or deviations were identified.

4. Organization and Management Control (82701)

This area was inspected to determine the effects of any changes in the licensee's emergency organization and/or management control systems on the emergency preparedness program, and to verify that any such changes were properly factored into the Emergency Plan and EPIPs. Requirements applicable to this area are found in 10 CFR 50.47(b)(1) and (16), Section IV.A of Appendix E to 10 CFR Part 50, and the licensee's Emergency Plan.

The organization and management of the emergency preparedness program were reviewed and discussed with licensee representatives. There were no significant organizational or personnel changes in the plant emergency planning group since the last such review in February 1992. The Station Coordinator, Emergency Planning, had served in that position for seven years and reported directly to the Assistant Station Manager, Nuclear Safety and Licensing. An individual holding the title of Coordinator, Emergency Planning, provided full-time assistance. These factors helped to provide a measure of assurance that emergency preparedness at the Surry Power Station would receive appropriate management attention and would have good "visibility" to station personnel.

The inspector discussed the status of offsite interfaces with the Station Coordinator, Emergency Planning. No significant problems were believed to exist relative to these interfaces, according to the licensee representative. This statement appeared to be confirmed by the results of the licensee's QA audit, discussed in Paragraph 6. It is noted here for the record that changes in management personnel for offsite support agencies since the February 1992 inspection included the designation of the Surry County Administrator as Emergency Services Coordinator (replacing the Deputy County Administrator, who resigned) and the assignment of the Fire Chief for the City of Williamsburg as Emergency Services Coordinator (a position which was formerly filled by the Director of the Department of Public Works).

The inspector reviewed the licensee's management strategy for ensuring compliance with the Emergency Plan requirements addressing the planning standard of 10 CFR 50.47(b)(2), which specifies that "timely augmentation of response capabilities is available." The applicable Emergency Plan requirements were contained in Section 5.2 and Tables 5.1 and 5.2. The licensee performed STP-56, "Emergency Plan Augmentation Callout Drill," on a quarterly basis, although this off-hour test involved only notification of emergency responders and determination of their availability, and did not include actual reporting to the station. The results of the five STP-56 tests conducted since May 1992 indicated that the licensee's onsite emergency organization could be augmented in accordance with the referenced Emergency Plan commitments.

The inspector determined that the following NRC Information Notices applicable to emergency planning were received by the licensee and distributed to cognizant personnel, and that any corrective actions deemed appropriate by the licensee were completed or scheduled:

- IN No. 92-08: Revised Protective Action Guidance for Nuclear Incidents
- IN No. 92-32: Problems Identified With Emergency Ventilation Systems for Near-Site (Within 10 Miles) Emergency Operations Facilities and Technical Support Centers
- IN No. 92-38: Implementation Date for the Revision to the EPA Manual of Protective Action Guides and Protective Actions for Nuclear Incidents
- IN No. 92-62: Emergency Response Information Requirements for Radioactive Material Shipments
- IN No. 93-03: Revision to 10 CFR Part 20 Implementation Date
- IN No. 93-07: Classification of Transportation Emergencies

The licensee's management control system for ensuring the timely completion of required tests and surveillances was reviewed and found to be very effective. The numerous emergency preparedness maintenance procedures (listed in Paragraph 3) of variable periodicity were performed in accordance with schedular requirements. The inspector also reviewed and discussed with licensee representatives the Emergency Preparedness Incomplete Items Listing, used to track open items for the licensee's two nuclear stations as well as for the corporate emergency preparedness program. This listing was appropriately detailed, and indicated for each item the responsible organization and individual along with a due date for completion. The licensee was effectively using this tracking system as a management tool for ensuring the completion of corrective action for identified problems in emergency preparedness.

No violations or deviations were identified.

5. Training (82701)

This area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities. Requirements applicable to this area are contained in 10 CFR 50.47(b)(2) and (15), Section IV.E of Appendix E to 10 CFR Part 50, and the licensee's Emergency Plan.

The licensee maintained the Nuclear Power Station Emergency Preparedness Training Program Guide, referenced in Section 8.3 of the Emergency Plan as the governing document for such training. In an effort to gauge the effectiveness of this training program, the inspector conducted an interview on June 10 with one Assistant Shift Supervisor, a position which, according to the licensee's designated line of succession, could assume the responsibilities of the interim SEM. This interview was designed to ascertain the (potential) SEM's understanding of emergency classification, offsite notifications and PARs, site evacuation, emergency worker dose limits, and nondelegable responsibilities of the SEM. This 105-minute interview began with technical questions relating to the duties, responsibilities, and functions of the SEM during an emergency situation, and then presented five accident scenarios that required event classification and PAR formulation, as appropriate. The scenarios were selected by the inspector from a bank of approximately 25 examination guestions provided and validated by the licensee's Training Department. The inspector delineated the guidelines for the interview at the outset, including the "open book" nature of the evaluation. The Station Coordinator, Emergency Planning, was present during the interview to allow for confirmation and firsthand understanding of observations.

The inspector determined that the interviewee had a satisfactory <u>overall</u> understanding of his duties and responsibilities in the event of an emergency, but was not able to adequately execute the associated detailed charges. One problematic point concerned the time allowed for notifying the NRC of an emergency declaration. The "Note" on page 2 of EPIP-2.02, "Notification of NRC" (Revision 10, approved June 1, 1993), stated that "NRC notification shall be made immediately after initial notification of State and local governments and in all cases within 1 hour." The interviewee understood the "1 hour" to be measured from the time at which notifications of State and local governments were 8

completed. This interpretation was not consistent with the regulatory requirement of 10 CFR 50.72(a)(3), which clearly specifies that the one-hour time limit for notifying the NRC is measured from the time of declaration of one of the emergency classes.

Further and more significant problems were disclosed when the interviewee erroneously classified two of the five scenarios presented. Scenario No. 3, concerning an earthquake, was classified as an Alert, whereas the correct classification was SAE per EAL Tab L-1 of EPIP-1.01, "Emergency Manager Controlling Procedure" (Revision 30, approved September 11, 1992). Scenario No. 5, involving the loss of main and auxiliary feedwater systems, was classified as a NOUE, whereas the proper classification was SAE per EAL Tab A-3. In a postinterview discussion, the Assistant Shift Supervisor realized that he had simply not considered all the relevant plant conditions in Scenario No. 3, and agreed that his answer was incorrect. However, he disagreed with the answer designated as correct for Scenario No. 5, stating that in his judgment the applicable EAL ("Total loss of the Main Feedwater AND Auxiliary Feedwater System") was not met by the given conditions. Immediately after the interview, the inspector discussed this matter with three members of the Operations Training staff, who maintained that the instructional emphasis regarding the subject EAL was such that the correct classification should have been obtained by the interviewee. In an attempt to ascertain whether the discrepancy was attributable to a faulty individual interpretation or an ambiguous EAL, the inspector presented the same five scenarios to four additional Senior Reactor Operators. All of these individuals correctly classified the first four scenarios, but two of the four gave the same erroneous answer (with the same rationale) for Scenario No. 5 as did the first interviewee.

After discussion and consideration of the above findings, licensee management elected to take the following actions: (a) clarify the "Note" on Page 2 of EPIP-2.02; (b) clarify the EAL at Tab A-3 regarding loss of function needed to achieve reactor hot shutdown condition; and (c) immediately provide remedial emergency response training to the subject Assistant Shift Supervisor, followed by a written examination, and furnish documentation of same to the NRC Senior Resident Inspector. These planned actions were confirmed by licensee management at the exit interview on June 11. By June 30, the inspector had received additional written information regarding all of the concerns discussed in this paragraph, and had discussed the licensee's follow-up actions in detail with the Station Coordinator, Emergency Planning. The first two issues were addressed by means of appropriate revisions to EPIP-2.02 and EPIP-1.01, respectively. The inspector's review of the EAL revisions in EPIP-1.01 was preliminary; formal NRC review will occur when the licensee incorporates these EAL changes in Appendix 10.8, "Emergency Classification/Initiating conditions Matrix," to the Emergency Plan. The third issue was addressed through the provision to the subject individual on June 11 of six hours of remedial emergency response training, examination, and discussion. The results, which included a score of 100 percent on the examination, were provided to and reviewed

by the Senior Resident Inspector. Based upon the licensee's prompt and appropriate corrective actions with respect to the problems identified in this paragraph, the subject concerns were determined by the inspector on June 30, 1993 to be fully resolved, and no NRC follow-up inspection of these issues is planned.

No violations or deviations were identified.

6. Independent and Internal Reviews/Audits (82701)

This area was inspected to determine whether the licensee had performed an independent audit of the emergency preparedness program, and whether the emergency planning staff had conducted a review of the Plan and the EPIPs. Requirements applicable to this area are found in 10 CFR 50.54(t) and the licensee's Emergency Plan.

The inspector reviewed the report documenting last year's required independent audit of the emergency preparedness program, conducted by the licensee's QA organization during the period April 14 - May 27, 1992 (Report No. 92-08). This was a company-wide audit which examined the emergency response capability for both of the licensee's nuclear stations and the corporate office. The inspector determined that the audit team utilized qualified personnel, including some with emergency planning experience. The audit checklists were comprehensive and detailed, and encompassed appropriate emergency preparedness procedures, regulatory requirements, and guidance. The audit scrutinized the implementation of the Emergency Plan and EPIPs, training, drills and exercises, facilities and equipment, interfaces with offsite agencies, and program documentation. Audit findings appeared to be effectively documented, tracked, and controlled, and were consistently corrected in a timely manner. The inspector reviewed the licensee's corrective actions with a QA specialist, who offered documentation indicating that all of the Surry open items from the audit had been closed by the QA group through follow-up inspection. The most recent required independent audit of the program was completed just prior to the current inspection, and will be documented as QA Audit 93-06. Although the final report on this audit had not yet been issued, the inspector reviewed the finished Executive Summary, which indicated no "findings" and two "enhancement items" for Surry. The annual QA audits of the emergency preparedness program were identified as a program strength.

The annual required internal review of the Plan and EPIPs was documented in a memorandum dated November 23, 1992 from the Station Coordinator, Emergency Planning, to the Station Nuclear Safety and Operating Committee. The review adequately assessed program accomplishments and needed corrective actions.

No violations or deviations were identified.

7. Licensee Action on Previous Inspection Findings

(Closed) IFI 50-335, 50-389/92-21-02: Reviewing methodology for generating PARs.

The licensee made extensive procedural changes following review of the scheme for deriving PARs. During a SAE or General Emergency, a new EPIP-1.06, "Protective Action Recommendations" (Revision 0, dated June 1, 1993), provided the SEM with a much more streamlined and less cumbersome methodology for determining the appropriate PAR for offsite authorities. Also revised were EPIP-4.07, "Protective Measures" (Revision 4, dated June 1, 1993), to incorporate the results of the latest evacuation time estimates, and EPIP-2.01, "Notification of State and Local Governments" (Revision 19, dated June 1, 1993), to simplify the process of transmitting a PAR to offsite authorities.

8. Exit Interview

The inspection scope and results were summarized on June 11, 1993 with those persons indicated in Paragraph 1. The inspector described the areas assessed and discussed the inspection results in detail. Licensee management was informed that the three concerns discussed in Paragraph 5 would be tracked as IFIs, and that an IFI from a previous inspection was considered closed, as noted in Paragraph 7. Dissenting comments were not received from the licensee. Although proprietary information was reviewed during this inspection, none is contained in this report.

Subsequent to the exit interview, documentation was provided by the licensee to the inspector regarding completed corrective actions to address the new IFIs. As delineated in Paragraph 5, the inspector concluded that the licensee had fully resolved the concerns that had been identified as IFIs during the exit interview. On June 30, 1993, the inspector informed the Station Coordinator, Emergency Planning, of this determination.

Index of Abbreviations Used in This Report

ALARA	As Low As Reasonably Achievable
ATWT	Anticipated Transient Without Trip
CFR	Code of Federal Regulations
CTS	Commitment Tracking System
EAL	Emergency Action Level
EPA	Environmental Protection Agency
EPIP	Emergency Plan Implementing Procedure
ERF	Emergency Response Facility
EWS	Early Warning System
FEMA	Federal Emergency Management Agency
HEPA	high-efficiency particulate air
IN	Information Notice
LEOF	Local Emergency Operations Facility
NOUE	Notification of Unusual Event
NRC	Nuclear Regulatory Commission







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Protective Action Recommendation
Quality Assurance
Site Area Emergency
Station Emergency Manager
Technical Specification
Technical Support Center

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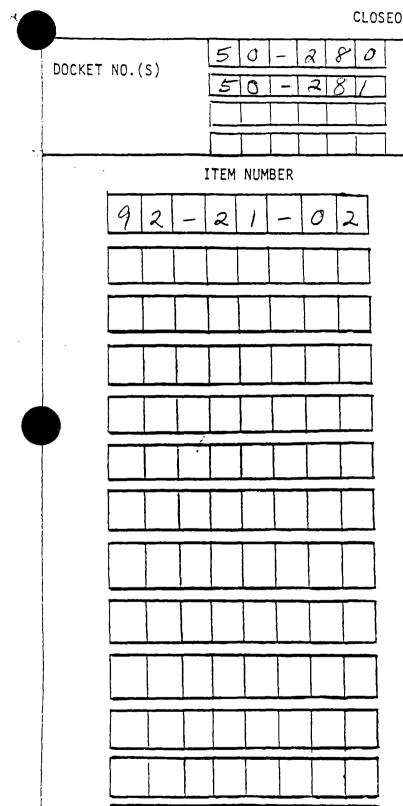
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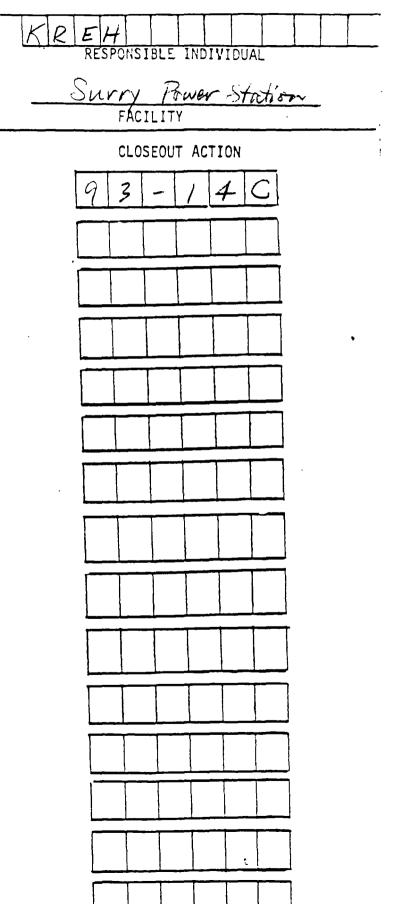
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OUTSTANDING ITEMS LIST (OIL)

CLOSEOUT FORM





SEE REVERSE FOR EXAMPLES