UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

August 13, 2019

Mr. Adam C. Heflin, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION – INTEGRATED INSPECTION REPORT 05000482/2019002

Dear Mr. Heflin:

On June 30, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Wolf Creek Generating Station. On July 11, 2019, the NRC inspectors discussed the results of this inspection with Mr. C. Reasoner, Senior Vice President and Chief Nuclear Officer, and other members of your staff. The results of this inspection are documented in the enclosed report.

NRC inspectors documented one Severity Level IV violation with no associated finding. The NRC is treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

Further, inspectors documented one licensee-identified violation, which was determined to be Severity Level IV in this report. The NRC is treating this violation as an NCV consistent with Section 2.3.2.a of the Enforcement Policy.

If you contest the violations, or significance or severity of the violations, documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the NRC Resident Inspector at the Wolf Creek Generating Station.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Neil F. O'Keefe, Chief
Reactor Projects Branch B

Docket No. 50-482
License No. NPF-42

Enclosure:
Inspection Report 05000482/2019002

cc w/encl: Electronic Distribution to
Wolf Creek Generating Station

U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	05000482
License Number:	NPF-42
Report Number:	05000482/2019002
Enterprise Identifier:	I-2019-002-0012
Licensee:	Wolf Creek Nuclear Operating Corp.
Facility:	Wolf Creek Generating Station
Location:	Burlington, Kansas
Inspection Dates:	April 1, 2019, to June 30, 2019
Inspectors:	R. Azua, Senior Reactor Inspector W. Cullum, Reactor Inspector D. Dodson, Senior Resident Inspector P. Elkmann, Senior Emergency Preparedness Inspector G. George, Senior Reactor Inspector S. Makor, Reactor Inspector J. Melfi, Acting Resident Inspector B. Tharakan, Senior Project Engineer F. Thomas, Acting Senior Resident Inspector
Approved By:	Neil F. O'Keefe, Chief Reactor Projects Branch B Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Wolf Creek Generating Station in accordance with the Reactor Oversight Process (ROP). The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

Failure to Submit a Revision to Section 9.1.4.3 of the Wolf Creek Updated Final Safety Analysis Report			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Not Applicable	NCV 05000482/2019002-01 Open/Closed	Not Applicable	71111.17T
The inspectors identified a Severity Level IV, non-cited violation of 10 CFR 50.71(e)(4) for the licensee's failure to revise Updated Final Safety Analysis Report, Section 9.1.4.3, to reflect changes to the reactor head load drop analysis.			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
LER	05000482/2018-002-00	Modification Activities Affected Control Room Envelope Boundary Causing a Condition Prohibited by Technical Specifications	71153	Closed

PLANT STATUS

Wolf Creek Generating Station began the inspection period operating at full power. On May 24, 2019, licensee conducted an unplanned power reduction to approximately 96 percent power following the loss of the start-up transformer, due to an external fault between cable terminations. After that event, the plant operated at or near full power for the rest of the period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed plant status activities described in IMC 2515 Appendix D, "Plant Status" and conducted routine reviews using IP 71152, "Problem Identification and Resolution." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

(1) Residual heat removal train A on April 9, 2019
(2) Component cooling water train A on June 25, 2019
(3) Safety injection train B on June 25, 2019
(4) Offsite circuit train B on June 28, 2019

71111.04S - Equipment Alignment

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated system configurations during a complete walkdown of the essential service water system on June 6, 2019.

71111.05A - Fire Protection (Annual)

Annual Inspection (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated fire brigade performance on April 12, 2019.

71111.05Q - Fire Protection

Quarterly Inspection (IP Section 03.01) (4 Samples)

The inspectors evaluated fire protection program implementation in the following selected areas:

(1) Essential service water pump house A and B, elevation 2,000 feet, fire areas ESW-1 and ESW-2, on June 6, 2019
(2) Auxiliary building, elevation 2,026 feet, fire areas A-27 and A-28, on June 26, 2019
(3) Control building, elevation 2,073 feet, fire area C-22, on June 26, 2019
(4) Fuel building, elevation 2,026 feet, fire areas F-4 and F-5, on June 26, 2019

71111.06 - Flood Protection Measures

Inspection Activities - Underground Cables (IP Section 02.02c.) (1 Sample)

The inspectors evaluated cable submergence protection in:

(1) Essential service water manhole MHE2B

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

(1) The inspectors observed and evaluated licensed operator performance in the control room during a planned power reduction to approximately 85 percent followed by planned turbine valve testing by under instruction reactor operators on April 25, 2019.

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

(1) The inspectors observed and evaluated crew performance evaluation activities on April 22, 2019.

71111.12 - Maintenance Effectiveness

Routine Maintenance Effectiveness Inspection (IP Section 02.01) (1 Sample)

The inspectors evaluated the effectiveness of routine maintenance activities associated with the following equipment and/or safety significant functions:

(1) Train A control room air condition unit SGK04A was declared inoperable due to cylinder head temperature increase on September 11, 2018

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated the risk assessments for the following planned and emergent work activities:

(1) Planned maintenance outages for the train B control room air conditioning unit and pressurizer backup heaters on April 3, 2019
(2) Start-up transformer unplanned cable connection repair on May 24, 2019

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 02.02) (2 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

(1) Component cooling water pump A surge tank level decrease on May 6, 2019
(2) Heavy forklift entered heavy load exclusion zone driving over buried trains A and B essential service water supply and return piping on May 23, 2019

71111.17T - Evaluations of Changes, Tests, and Experiments

Sample Selection (IP Section 02.01) (32 Samples)

From April 29 to May 2, 2019, the inspectors reviewed the 10 CFR 50.59 safety evaluations, screenings, and/or applicability determinations associated with following changes:

(1) Procedure ALR 00-089B, Diesel Generator Fuel Tank A Level LO, Revision 16 (Applicability Determination)
(2) Calculation JE-J-002, Estimation of Emergency Fuel Oil Storage Tank Level Indication Loop, Revision 0 (Screen)
(3) Design Change Package DCP 14811, Install Piping Support on Pipe KC079KBF-6 to Seismically Qualify Piping, Revision 2 (Screen)
(4) Design Change Package DCP 14780, Replace EDG Crankcase Pressure Transmitter With Gauge, Revision 0 (Screen)
(5) Procedure STS EJ-100B, RHR System Inservice Pump B Test, Revision 46 (Screen)
(6) Minor Change Package MCP 14870, SJHV0137 High Temp Wire, Revision 0 (Screen)
(7) Design Change Package DCP 14520, Replacement for obsolete fisher 7810 valve and 656 actuator, Revision 0 (Screen)
(8) Design Change Package DCP 14788, Containment air cooler coil replacement for SGN01B, Revision 2 (Screen)
(9) Design Change Package DCP 14917, Manual valve installation on SI test header, Revision 0 (Screen)
(10) Design Change Package DCP 20161, Removal of interlock to motor-driven feedwater pump motor start, Revision 0 (Screen)
(11) Procedure SYS EM-121, ECCS Check Valve Leak Check, Revision 0 (Screen)
(12) Procedure SYS EM-200, Safety Injection Operation to Seat Accumulator Line Check Valves, Revision 0 (Screen)

(13) Procedure SYS KJ-300, Removal of EDG support systems, Revision 0 (Screen)
(14) Design Change Package DCP 15081, New RHR Pressure Transmitter EJPT0027 and NPIS Point, Revision 0 (Screen)
(15) Change Package CCP 013192, Replacement Speed Switch and Added Power Supply for Emergency Diesel Generator, Revision 0 (Screen)
(16) Field Change Notice FCN 14209, Square D Masterpact Breaker (GE AKR Replacement) & DCGM01A/B Repowering from NG Load Centers, Revision 7 (Screen)
(17) Design Change Package DCP 14598, Replacement Transformer for XSL2G, Revision 0 (Screen)
(18) Design Change Package DCP 14800, Installation of Digital Out-of-Step Relays, Revision 0 (Screen)
(19) Minor Change Package MCP 15036, Siemens Circuit Breaker Type 5-3AH-GER-350-1200-78 Equivalency for Existing Type 5-3AF-GER-350-1200-78 Breaker, Revision 0 (Screen)
(20) Procedure OFN NB-042, Loss of Offsite Power to NB01 (NB02) with EDG Paralleled, Revision 11 (Screen)
(21) Procedure OFN SB-008, Instrument Malfunctions, Revision 44 (Screen)
(22) Procedure SYS KJ-123, Post Maintenance Run of Emergency Diesel Generator A, Revision 62 (Screen)
(23) Procedure EMG ES-32, Post-SGTR Cooldown Using Blowdown, Revision 19 (Screen)
(24) Procedure EMG CS-02, Loss of All AC Power Recovery with SI Required, Revision 24 (Screen)
(25) Procedure OFN SG-003, Natural Events, Revision 36 (Screen)
(26) Evaluation No. 59 2016-0002, Dedicated Operator to Support Maintenance Activity on GKD0081, Revision 0 (Evaluation)
(27) Evaluation No. 59 2017-0001, Install Open Phase Detection (OPD) on Startup Transformer and OPD Trip Function for No. 7 Transformer, Revision 0 (Evaluation)
(28) Evaluation No. 59 2018-0001, Radiological Consequences of a Fuel Handling Accident in the Fuel Handling Building during Can Sipping, Revision 0 (Evaluation)
(29) Evaluation No. 59 2017-0002, Wolf Creek Generating Station Simplified Head Assembly Drop Analysis Revision, Revision 1 (Evaluation)
(30) Evaluation No. 59 2018-0002, Change SR Detector Actuation from Automatic to Manual, Revision 0 (Evaluation)
(31) Evaluation No. 59 2018-0003, Operation of Class 1E Compensatory Cooling during Post-Modification Testing, Revision 1 (Evaluation)
(32) Evaluation No. 59 2017-0003, Temporarily Secure Cavity Cooling Fans to Support NI-31 Degraded Cooling Issue, Revision 0 (Evaluation)

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (2 Samples)

The inspectors evaluated the following temporary or permanent modifications:

(1) Design Equivalent Change Package 020280 to approve use "as is" for terminal lug on start-up transformer low voltage bushing
(2) Temporary Modification TMO-19-002-BG, "Leak Sealant Injection for Internal Leakage Through BGV0214," associated with the regenerative heat exchanger

71111.19 - Post-Maintenance Testing

Post Maintenance Test Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated the following post maintenance tests:

(1) Pressurizer backup heater group B testing following planned maintenance on April 3, 2019
(2) Residual heat removal pump suction from the refueling water storage tank valve (BNHV8812A/B) testing following emergent maintenance on April 9, 2019
(3) Start-up transformer XMR01 testing following emergent maintenance on May 27, 2019

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

FLEX Testing (IP Section 03.02) (1 Sample)

(1) FLEX equipment testing - 150 KW and 500 KW diesel generator loaded test runs on June 11, 2019

Inservice Testing (IP Section 03.01) (2 Samples)

(1) STS EJ-201B, "Train B [Residual Heat Removal] System Inservice Valve Test," on Aril 8, 2019
(2) STS AL-210D, "[Auxiliary Feedwater] Inservice Check Valve Test," on June 5, 2019

Surveillance Tests (other) (IP Section 03.01) (4 Samples)

(1) STS IC-260, "Channel Operation Test Auxiliary Feedwater Pump Suction Pressure Low Transfer to [Essential Service Water]," on April 1, 2019
(2) STS GG-001A,"Emergency Exhaust Filtration System Train A Operability Test," on April 18, 2019
(3) STS IC-805B, "Channel Calibration of NB02 Grid Degraded Voltage, Time Delay Trip," on May 7, 2019
(4) STS IC-615B, "Slave Relay Test K615 Train B Safety Injection," on June 3, 2019

71114.08 - Exercise Evaluation Scenario Review

Inspection Review (IP Section 02.01 - 02.04) (1 Sample)

The inspectors reviewed the licensee's preliminary exercise scenario which was submitted to the NRC on March 28, 2019. The inspectors discussed the preliminary scenario with Mr. M. Dekat, Superintendent, Emergency Planning, on April 29, 2019. The inspectors' review does not constitute NRC approval of the scenario.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

MS07: High Pressure Injection Systems (IP Section 02.06) (1 Sample)

(1) July 1, 2018, through June 30, 2019

MS10: Cooling Water Support Systems (IP Section 02.09) (1 Sample)

(1) July 1, 2018, through June 30, 2019

71152 - Problem Identification and Resolution

Semiannual Trend Review (IP Section 02.02) (2 Samples)

(1) The inspectors reviewed the licensee's corrective action program for potential adverse trends in the area of safety conscious work environment (SCWE) and mitigating system performance indicator accounting and reporting that might be indicative of more significant safety issues.
(2) The inspectors reviewed the licensee's corrective action program for trends in human performance and equipment reliability that might be indicative of more significant safety issues.

71153 – Follow-up of Events and Notices of Enforcement Discretion

Event Report (IP Section 03.02) (1 Sample)

The inspectors evaluated the following licensee event reports (LERs):

(1) LER 05000482/2018-002-00, "Modification Activities Affected Control Room Envelope Boundary Causing a Condition Prohibited by Technical Specifications" (ADAMS Accession: ML19065A049). The circumstances and performance deficiency surrounding this LER are documented in Section 71152 – Problem Identification and Resolution of Inspection Report 05000482/2018003.

INSPECTION RESULTS

Observation: Semiannual Trend Review	71152
The inspectors reviewed the licensee's corrective action program for trends in the area of SCWE. SCWE The NRC conducted several inspections during the assessment period to assess the corrective actions taken to address the existing SCWE cross-cutting theme, including observations made in a Problem Identification and Resolution Inspection (Inspection Report 05000482/2018007 (ADAMS ML18218A265)) and a quarterly Integrated Inspection (Report 05000482/2018004 (ADAMS ML19042A089)). Based on these inspections and	

review of the licensee's actions taken and planned, as well as the issuance of the violation of 10 CFR 50.7, the NRC determined that a theme in the SCWE area continued to exist.

Consistent with NRC guidance, the licensee's progress on addressing the SCWE theme will be reviewed on a semiannual basis. During the current inspection, the inspectors' review included consideration of previous NRC reviews of the licensee's progress in addressing the SCWE theme, recent actions that Wolf Creek has completed or planned to address the cross-cutting theme in the SCWE area, and consideration of recent enforcement actions taken by the NRC.

The inspectors reviewed approximately 60 condition reports during this effort that were directly or potentially related to SCWE. The number of condition reports from June 2018 to December 2018 were compared against the number of SCWE condition reports that were written between January 2019 to June 2019, the specific content of the SCWE condition reports was evaluated, and the number of anonymous SCWE condition reports was assessed.

Assessment

With regard to actions taken to address the cross-cutting theme in the SCWE area, it appears that the licensee is applying the corrective actions as described in their identified plan. Many of the corrective actions taken include senior management presentations to the staff (referred to as Blitzes), group training for managers, group training for employees, and procedural changes. These activities (Blitzes, training and procedural changes) are not yet complete, and the licensee has not yet evaluated the effectiveness of these actions. The inspectors reviewed the licensee's actions and did not identify any significant concerns.

Regarding the trend of SCWE-related condition reports, there did appear to be an increase in number compared to previous time periods. Upon review, the inspectors determined that the increase in number of SCWE-related condition reports coincided with the scheduled management presentations on SCWE (Blitzes), indicating that the topic was gaining more attention across the site. A closer review of these condition reports identified a number that would fall into the Non-Condition Adverse to Quality (NCAQ) category. The inspectors concluded that the increase in SCWE-related condition reports was not unusual and did not represent a degradation in the licensee's SCWE. However, the inspectors noted that the number of anonymous condition reports did not appear to decrease, indicating that there are still employees who do not feel comfortable bringing their concerns directly to their management.

Observation: Semiannual Trend Review	71152

The inspectors reviewed the licensee's corrective action program for trends in human performance and equipment reliability that might be indicative of more significant safety issues.

Human Performance

During this past quarter, the licensee experienced multiple human performance issues associated with procedure implementation. The following condition reports were written for events that have occurred in the quarter:

- CR 132789 and CR 132791 – On May 29, 2019, during maintenance work to replace batteries associated with an uninterruptable power supply for security related facilities, the site experienced a loss of power to the main security building. Human error was determined to be the cause. Specifically, while implementing maintenance procedures to align equipment for battery replacement, technicians accidentally disconnected power to the main security building.

- CR 132303: On May 9, 2019, while performing chemical and volume control system diaphragm valve torqueing and post maintenance tests for the boron thermal regeneration system (BTRS) in preparation for the outage, operators identified that letdown flow unexpectedly went to 0 gallons per minute during a valve stroke. Logs indicate that operators returned the subject valve to the closed position, which restored letdown flow to the initial value. Further investigation revealed that the procedure did not direct operators to place the subject valve in manual. The cause was determined to be lack of adequate rigor during the procedure change process.

- CR 132451: On May 8, 2019, maintenance technicians completed a clean and inspect work order in the wrong cabinet on the BTRS. The technicians were signed on to the appropriate clearance order for the work order they were using. However, the labeling for the two cabinets was unclear, and the technicians did not stop to resolve which was the correct cabinet, which led to the technicians performing work in the wrong cabinet.

- CR 131452: On April 10, 2019, while performing a post-maintenance test on the B instrument air compressor, a control room operator failed to verify that the train B essential service water supply valve to the B instrument air compressor was open. The compressor had been filled and vented, but there was no cooling water flow through the compressor. Thus, when the compressor was started and loaded, it tripped on high temperature.

On May 16, 2019, CR132471 was initiated by the licensee to document an adverse trend in maintenance performance. Condition Reports 132451 and 132791 were added to CR 132471 as examples for the trend analysis. This condition report concluded that the maintenance organization demonstrated less than adequate performance due to inattention to detail and mis-judgement. It also concluded that individuals rationalized proceeding in the face of uncertainty instead of stopping when unsure. Furthermore, on April 11, 2019, CR 131489 was initiated to document a site trend for failure to use effective human performance error reduction tools. All of the above mentioned human performance issues have a commonality of a lack of attention to detail in implementing procedures.

Overall, inspectors determined that the licensee has adequately captured the above issues in their corrective action program. Also, the licensee has taken timely action to identify a low-level trend in human performance and implement corrective actions.

<u>Equipment Reliability - Communications Issues with Radiation Monitors</u>

In May and June 2019 the licensee experienced several instances of system communications failures that led to the inoperability of safety-related radiation monitors. These issues were documented in the following condition reports, that were written within one month:

- CR 132680: On May 23, 2019, the train A fuel building exhaust radiation monitor (GGRE0027) was declared inoperable due to having lost communications from field computer point (RM-80) to the control and display panel in the control room (RM-23).

- CR 133199: On June 13, 2019, operators declared the train B fuel building exhaust radiation monitor (GGRE0028) inoperable due to communications failure experienced while performing channel operational testing on GGRE0028.

- CR 133212: On June 17, 2019, the licensee declared the train A control building supply air radiation monitor (GKRE0005) inoperable due to a communications failure. Technical Specification 3.3.7, Condition A required operators to place one train of Control room emergency ventilation system in control room ventilation isolation mode.

- CR 133314: On June 19, 2019, the licensee identified that five radiation monitors had exceeded their established Maintenance Rule performance criteria for cumulative unavailability. The three-aforementioned safety-related radiation monitors were included in the five radiation monitors reviewed in this condition report.

The above-mentioned issues with the GGRE0027, GGRE0028, and GKRE0005 radiation monitors, have a commonality of communications failure. These failures indicate a low-level trend for decreasing radiation monitor reliability combined with a trend of increased unavailability time for radiation monitors. The inspectors noted that these trends appeared to indicate a lack of priority for radiation monitor repair.

Failure to Submit a Revision to Section 9.1.4.3 of the Wolf Creek Updated Final Safety Analysis Report

Cornerstone	Severity	Cross-Cutting Aspect	Report Section
Not Applicable	Severity Level IV NCV 05000482/2019002-01 Open/Closed	Not Applicable	71111.17T

The inspectors identified a Severity Level IV, non-cited violation of 10 CFR 50.71(e)(4) for the licensee's failure to file a revision of Section 9.1.4.3, "Safety Evaluation," of the Wolf Creek Final Safety Analysis Report, which reflected changes to the reactor head load drop analysis.

Description: Section 9.1.4.3 of the Wolf Creek Updated Final Safety Analysis Report contains the safety evaluation for various fuel handling system accidents. One of the fuel handling accidents postulated is a fuel handling accident caused by a drop of the reactor vessel head caused by failure of the polar crane. Updated Final Safety Analysis Report (UFSAR), page 9.1-53 to page 9.1-70, contain the analysis methodology, accident cases, input assumptions such as weight and dissipation factors, and results for the postulated drop of the reactor vessel head assembly.

In November 2017 the licensee approved Calculation 0720517.01-C-001, "Wolf Creek Generating Station (WCGS) Simplified Head Assembly (SHA) Drop Analysis," Revision 1. This calculation updated the previous reactor vessel head drop analysis to include an increased reactor vessel head assembly weight due to insulation changes and addition of canopy seal clamp assemblies. Additionally, inputs for the reactor vessel weight, reactor vessel nozzle stiffness, support stiffness, and energy dissipation factors were changed to produce more conservative results. These analyses were performed with two

new accident cases at drop heights of 28.5 feet and 32 feet above the vessel flange, respectively. The change to design inputs resulted in the calculation results being more conservative than the results reflected in the UFSAR Section 9.1.4.3 for bending stress, vessel nozzle displacement, and support displacement. To support the calculation changes, the licensee completed a 10 CFR 50.59 safety evaluation (approved in December 2017) to determine that the change in design inputs and results would not require a license amendment from the NRC.

Step 6.2.1 of Procedure AP 26A-003, "10 CFR 50.59 Reviews," directs the licensee to initiate a change to the UFSAR if the proposed change causes the existing information in the UFSAR is no longer correct. However, during the May 2019 NRC inspection, the inspectors identified that the action to update the UFSAR was still open and no revision to UFSAR, Section 9.1.4.3, was being actively pursued.

Since the change to the reactor vessel head drop analysis in the UFSAR was approved, the licensee has submitted two annual revisions of the UFSAR to the NRC, in March 2018 and on March 11, 2019. Title 10 CFR 50.71(e) requires annual updates to the UFSAR which reflect all changes up to a maximum 6 months prior to the date of filing. In this case, the licensee failed to submit a revision of UFSAR, Section 9.1.4.3, in their March 11, 2019, submittal (ADAMS Accession No. ML19092A099).

Corrective Actions: The licensee entered the issue into the corrective action program to generate a Final Safety Analysis Report change request.

Corrective Action References: Condition Report 132010

Performance Assessment: The inspectors determined this violation was associated with a minor performance deficiency. The licensee's failure to meet Procedure AP 26A-003, "10 CFR 50.59 Reviews," Revision 14, Step 6.2.1 to initiate a change to the UFSAR when a change makes the existing UFSAR information no longer correct was a performance deficiency.

Enforcement: The ROP's significance determination process does not specifically consider the regulatory process impact in its assessment of licensee performance. Therefore, it is necessary to address this violation which impedes the NRC's ability to regulate using traditional enforcement to adequately deter non-compliance.

Severity: Because this performance deficiency had the potential to impact the NRC's ability to perform its regulatory function, it is necessary to address this violation using traditional enforcement to adequately deter non-compliance. Using the NRC Enforcement Policy, dated May 15, 2018, the violation was determined to be a Severity Level IV violation in accordance with Section 6.1.d.3, because the lack of up-to-date information in the UFSAR had not resulted in any unacceptable changes to the facility or procedures.

Violation: Title 10 CFR Part 50.71(e) requires, in part, each person licensed to operate a nuclear power reactor under the provisions of § 50.21 or § 50.22, and each applicant for a combined license under Part 52 of this chapter, shall update periodically, as provided in paragraphs (e)(3) and (4) of this section, the Final Safety Analysis Report (FSAR) originally submitted as part of the application for the license, to assure that the information included in the report contains the latest information developed. This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the applicant or licensee or prepared by the applicant or licensee pursuant to Commission requirement since the submittal of the original FSAR, or as appropriate, the last update to the

FSAR under this section. The submittal shall include the effects of all changes made in the facility or procedures as described in the FSAR; all safety analyses and evaluations performed by the applicant or licensee either in support of approved license amendments or in support of conclusions that changes did not require a license amendment in accordance with § 50.59(c)(2) or, in the case of a license that references a certified design, in accordance with § 52.98(c) of this chapter; and all analyses of new safety issues performed by or on behalf of the applicant or licensee at Commission request.

Title 10 CFR Part 50.71(e)(4) requires, in part, subsequent revisions must be filed annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months. The revisions must reflect all changes up to a maximum of 6 months prior to the date of filing.

Contrary to the above, on March 11, 2019, the licensee made a subsequent revision to the UFSAR and failed to include all changes up to a maximum of 6 months prior to the date of filing. Specifically, on March 11, 2019, the licensee failed to update FSAR Section 9.1.4.3 to reflect the effects of a December 2017, § 50.59 safety evaluation which concluded that changes to the safety analysis for the postulated drop of the reactor vessel head during refueling activities would not require a license amendment.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Licensee Identified Non-Cited Violation	71152 Problem Identification and Resolution
This violation of very low safety-significance was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.	
Violation: Title 10 CFR Part 50.71 (e) requires, in part, that each person licensed to operate a nuclear power reactor under the provisions of § 50.21 or § 50.22, and each applicant for a combined license under part 52 of this chapter, shall update periodically, as provided in paragraphs (e) (3) and (4) of this section, the Final Safety Analysis Report (FSAR) originally submitted as part of the application for the license, to assure that the information included in the report contains the latest information developed. This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the applicant or licensee or prepared by the applicant or licensee pursuant to Commission requirement since the submittal of the original FSAR, or as appropriate, the last update to the FSAR under this section. The submittal shall include the effects of all changes made in the facility or procedures as described in the FSAR; all safety analyses and evaluations performed by the applicant or licensee either in support of approved license amendments or in support of conclusions that changes did not require a license amendment in accordance with § 50.59(c)(2) or, in the case of a license that references a certified design, in accordance with § 52.98(c) of this chapter; and all analyses of new safety issues performed by or on behalf of the applicant or licensee at Commission request. Title 10 CFR Part 50.71(e)(4) requires that subsequent revisions must be filed annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months. The revisions must reflect all changes up to a maximum of 6 months prior to the date of filling.	

Contrary to the above, between March 11, 2017 and March 11, 2019, the licensee made two subsequent revisions to the UFSAR and the changes did not reflect all changes up to a maximum of 6 months prior to the date of filing. Specifically, the licensee failed to update FSAR Section 13.2.2 to reflect the removal of requirements for six preplanned lecture series during a two-year training cycle for Nuclear Station Operators (NSOs) and two preplanned lecture series during a two-year training cycle for Treatment Systems Operators (TSOs).

Significance/Severity Level: Using the NRC Enforcement Policy, dated May 15, 2018, the violation was determined to be a Severity Level IV violation in accordance with Section 6.1.d.3, because the lack of up-to-date information in the UFSAR had not resulted in any unacceptable changes to the facility or procedures.

Corrective Action Reference(s): Condition Reports 127609, 133798, and 133810.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On May 2, 2019, the inspectors presented the Inspection Procedure 71111.17T, "Evaluations of Changes, Tests, or Experiments," results to Mr. J. McCoy, Site Vice President, and other members of the licensee staff.

- On July 11, 2019, the inspectors presented the integrated inspection results to Mr. C. Reasoner, Sr. Vice President and Chief Nuclear Officer, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Corrective Action Documents	Condition Report	133555	
	Drawings	M-12EG01	Piping & Instrumentation Diagram Component Cooling Water Storage System	25
		M-12EJ01	Piping and Instrumentation Diagram Residual Heat Removal System	55
		M-12EM01	Piping & Instrumentation Diagram High Pressure Coolant Injection System	45
	Procedures	CKL EF-120	Component Cooling Water System Valve, Switch and Breaker Lineup	49
		CKL EJ-120	RHR System Lineup	46
		CKL EM-120	Safety Injection System Valve, Switch and Breaker Lineup	33
71111.04S		CKL EF-120	Essential Service Water Valve, Breaker and Switch Lineup	54
71111.05A	Miscellaneous	APF 10-105-02	Fire Drill Scenario and Critique Report	04/12/2019
71111.05Q	Corrective Action Documents	Condition Report	131029	
	Miscellaneous		Fire Hazard Analysis	
	Procedures	AP 10-106	Fire Preplans	18A
71111.06	Work Orders		17-434627-003	
71111.11Q	Corrective Action Documents	Condition Report	131888	
	Miscellaneous	A18-048	SMP Brief Description - 'A' MFRV Has Full Open Indication in the Plant	07/12/2018
		LR 4412801	Simulator Scenario	04/22/2019
	Procedures	AP 21-001	Conduct of Operations	83A
		STS AC-001	Main Turbine Valve Cycle Test	54A
71111.12	Miscellaneous		System Health Report: GK - Control Building HVAC	04/01/2016 to 06/30/2016
			System Health Report: GK - Control Building HVAC	01/01/2018 to 06/30/2018

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			System Health Report: GK - Control Building HVAC	01/01/2017 to 06/30/2017
			System Health Report: GK - Control Building HVAC	01/01/2016 to 03/31/2016
			System Health Report: GK - Control Building HVAC	07/01/2016 to 12/31/2016
			System Health Report: GK - Control Building HVAC	07/01/2017 to 12/31/2017
			Maintenance Rule Final Scope Evaluation: System GK - Control Building HVAC System, Function GK-01	07/22/2019
			Maintenance Rule Final Scope Evaluation: System GK - Control Building HVAC System, Function GK-03	07/22/2019
			Maintenance Rule Final Scope Evaluation: System GK - Control Building HVAC System, Function GK-04	07/22/2019
			Maintenance Rule Final Scope Evaluation: System GK - Control Building HVAC System, Function GK-05	07/22/2019
			Maintenance Rule Final Scope Evaluation: System GK - Control Building HVAC System, Function GK-02	07/22/2019
		EDI 23M-050	Engineering Desktop Instruction Monitoring Performance to Criteria and Goals: Justification for Considering a Functional Failure not an MPFF - CR 126508	10/11/2018
	Work Orders		15-400195-010, 18-444800-000, 18-444800-001, 18-444800-002, 18-444800-003, 18-444800-004, 18-444800-005, 18-444800-006, 18-444800-007, 18-444800-008, 18-444800-009, 18-444800-011, 18-444800-012, 18-444800-013	
71111.13	Miscellaneous	APF 22C-003-01	On-Line Nuclear Safety and Generation Risk Assessment: Schedule Week 19-0201	02/12/2019
	Procedures	STS NB-005	Breaker Alignment Verification	34A
71111.15	Corrective Action	Condition Report	131981	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents			
	Miscellaneous		Operations Archive Log	04/27/2019 to 05/07/2019
		APF 30B-004-01	Essential Required Reading - Op Eval of EF-19-001	05/24/2019
		WCRE-03	Wolf Creek Tank Document	31
71111.17T	Corrective Action Documents	Condition Reports	91552, 106725, 132010, 132040	
	Drawings	E-13KJ01A	Schematic Diagram Diesel Generator KJ01A Engine Control (Start/Stop Circuit)	16
		E-13KJ01B	Schematic Diagram Diesel Generator KKJ01A Engine Control (D/G Trips)	7
		E-13KJ02	Schematic Diagram Diesel Generator KKJ01A Annunciator and Miscellaneous Circuits	8
		M-12EM01	Piping and Instrumentation Diagram High Pressure Coolant Injection System	45
		M-12KJ03	Piping and Instrumentation Diagram Standby Diesel Generator "A" Lube Oil System	18
		M-12KJ03	Piping and Instrumentation Diagram Standby Diesel Generator "A" Lube System	17
		M-627A-00108	Schedule for Q Listed Dampers	6
	Miscellaneous	DCP 014520	Replacement for Obsolete Fisher 7810 Valve and Actuator	0
		DCP 014788	Containment Air Cooler Replacement for SGN01B	2
		DCP 014917	Manual Valve Installation on SI Test header	0
		DCP 020060	Change SR Detector Actuation from Automatic to Manual	0
		DCP 020161	Removal of Interlock to Motor Driven Feedwater Pump Motor Start	0
		DCP 13192	Replacement Speed Switch & Added Power Supply for Emergency Diesel Generator	1
		DCP 14209	Square D Masterpact Breaker (GE AKR Replacement) & DCGM01A/B Repowering from NG Load Centers	10
		DCP 14570	Install Open Phase Detection on Startup Transformer and OPD Trip Function for No. 7	3
		DCP 14598	Replacement Transformer for XSL2G	1

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		DCP 14800	Installation of Digital Out of Step Relays	0
		DCP 15036	Siemens Circuit Breaker Type 5-3AH-GER-350-1200-78 Equivalency for Existing Type 5-3AF-GER-350-1200-78 Breaker	0
		DCP 15081	New RHR Pressure Transmitter EJPIT0027 and NPIS Point	2
		DCP 20060	Change SR Detector Actuation from Automatic to Manual	0
		M-627A-00078	Instruction Manual for Dampers American Warming and Ventilation	W08
		QH-201901796	50.59 Pre-Inspection Self-Assessment	04/15/2019
		SWO 12-350418-024	Evaluation for Allowing Securing SGN01B when Containment Temperature is Greater than 95°F	3
		SWO 16-417067-008	Required Function of GKD0081	08/30/2016
	Procedures	AI 26A-003	Regulatory Evaluations (Other Than 10 CFR 50.59)	16
		ALR 00-77E	SR HI VOLT FAIL	14
		AP 26A-003	10 CFR 50.59 Reviews	14
		CKL EM-120	Safety Injection System Lineup Checklists	33
		GEN 00-002	Cold Shutdown to How Standby	102
		GEN 00-003	Hot Standby to Minimum Load	101
		GEN 00-005	Minimum Load to Hot Standby	92
		OFN MA-038	Rapid Plant Shutdown	30
		OFN NB-042	Loss of Offsite Power to Nb01 (Nb02) With EDG Paralleled	11
		OFN SB-008	Instrument Malfunctions	47
		STN AE-007	Startup Main Feedwater Pump Operational Test	12A
		SYS DF-120	Rod Control System Operation	41
		SYS EM-121	ECCS Check Valve Leak Check	0
		SYS EM-200	Safety Injection Operation to Seat Accumulator Line Check Valves	0
		SYS GK-122	Manual CRVIS Line-Up	22
		SYS KJ-123	Post Maintenance Run of Emergency Diesel Generator AV	62
		SYS KJ-300	Removal of EDG Support Systems	0
71111.18	Corrective Action Documents	Condition Report	133162	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Drawings	M-12BG01	Piping and Instrumentation Diagram - Chemical and Volume Control System	20
		M-12BG01	Piping & Instrumentation Diagram Chemical and Volume Control System	19
		M-12LF09	Piping and Instrumentation Diagram Reactor Bldg and Hot Machine Shop Floor and Equipment Drain System	8
		M-13BG26	Piping Isometric - CVCS Cation, Mixed Bed Demineralizers "A" and "B" - Aux Bldg.	6
		M-13BG26	Small Piping Isometric Chemical and Volume Control System Reactor Building	4
	Miscellaneous		HVT Series Termination 5-35kV Class - High Voltage Termination for Copper Tape, Wire Shield, Lead Sheath and UniShield Cable	08/18/1998
		020280	Design Equivalent Change Package: Damaged Terminal Lug on Startup Transformer Low Voltage Bushing	0
		APF 05C-004-01	Basic Engineering Disposition: XMR01 Startup Transformer Testing Acceptance - CR132693	05/27/2019
		APF 29B-003-01	Surveillance Test Routing Sheet (STRS): RCS Water Inventory Balance Using the NPIS Computer	06/12/2019
		APF 29B-003-01	Surveillance Test Routing Sheet (STRS): RCS Water Inventory Balance Using the NPIS Computer	06/13/2019
		APF 29B-003-01	Surveillance Test Routing Sheet (STRS): RCS Water Inventory Balance Using the NPIS Computer	06/14/2019
		E-003.3-00030	Instruction Manual for Power Transformers	W15
		E-003.3-00054	Westinghouse Electric Corporation Instructions for Forced-Air Cooling Equipment Unit Fan Assembly	W01
		FSC-N-6B	Compound Information Sheet: Furmanite	6
		IP-ENG-001	Standard Design Process	0
		RPF 02-210-01	WCGS Radiological Survey Map - Survey M-20190612-9	06/12/2019
		TMO 19-002-BG	Design Equivalent Change Package - Temporary Modification Order (TMO) - Leak Sealant Injection (MPM LR-001) For Internal Leakage Through BGV0214	0
		TMO 19-002-BG	Design Equivalent Change Package: Leak Sealant Injection (MPM LR-001) for Internal Leakage Through BGV0214	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Procedures	AP 21I-001	Temporary Configuration Changes	15
		MPE MR-002	Start-Up Transformer Maintenance Activities	2
		MPE XF-001	Transformer (COPS) Visual and Fan Test Run Inspection	10
		MPM LR-001	Leak Sealant Injection	9
		RM-3-010	Connecting 37pt. CT Junction Block	1
	Work Orders		18-440283-002	
			18-440283-003	
71111.19	Miscellaneous		Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power Operated Gate Valves" - Wolf Creek Generating Station Unit 1 (TAC No. M93540)	09/02/1999
		18-441116-001	Votes Infinity Valve Diagnostic System: Rising Stem Thrust Evaluation	04/09/2019
		96-48	Information Notice 96-48, Supplement 1: Motor-Operated Valve Performance Issues	07/24/1998
		98-00810	Technical Update 98-01 and Technical Update 98-01 Supplement #1	07/17/1998
		APF 05-002-01	Engineering Screening: 09120	0
		APF 05-002-05	Engineering Disposition: Margin Optimization for Motor Operated Valves EJHV8804A & EJHV8804B	1
		APF 05-002-05	Engineering Disposition: Margin Optimization for Motor Operated Valves BNHV8812A & BNHV8812B	0
		APF 05-002-05	Engineering Disposition: MOV Thrust/Torque Per Limitorque Technical Update 98-01 & Supplement 1	0
		APF 05-002-06	Change Package: Configuration Item Identification & Reference Form	0
		APF 05-002-07	Pre-implementation Planning Review: 09120	0
		APF 05D-001-01	Calculation Cover Sheet: Thrust/Torque Calculation for BNHV8812A and BNHV8812B	8
		APF 05D-001-02	Calculation Change Notice No. BN-M-011-008-CN001	2
		APF 26A-003-01	Regulatory Screening: CCP 09118	1
		APF 26A-003-01	Regulatory Screening: CCP 09120	0
		APF 26A-003-01	Regulatory Screening: DCP 07950	0
		APF 26A-003-03	10 CFR 50.59 Unreviewed Safety Question Determination: CCP 09118	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		APF 28A-001-01	Performance Improvement Request Initiation: PIR 962484	10/04/1996
		PM File: 48523	Megger Test Group B - PG022 Backup Immersion Heaters (Located in the Pressurizer)	
	Procedures	AI 23D-003	MOV Trending and Periodic Verification Program	3
		AI 29B-003	Guidance to Prevent Unacceptable Preconditioning Prior to Testing	2
		STS MT-001B	PG22 Pressurizer Heater Verification	5
		STS NB-005	Breaker Alignment Verification	34A
		STS PE-007	Periodic Verification of Motor Operated Valves	5A
	Work Orders		17-432997-000, 17-433510-026, 18-436910-000	
71111.22	Corrective Action Documents	Condition Reports	133126, 133131	
	Drawings	10466-J-110-0357	Auxiliary Feedwater System Aux. Fw. Supply Pressure From Condensate Storage Tank	6
		M-12EJ01	Piping and Instrumentation Diagram Residual Heat Removal System	55
	Miscellaneous		Supplemental Brief Sheet - STS IC-615A/B	
		APF 05-013-01	E-1R8902 Physical Separation Exemptions	10
		APF 15C-002-01	Procedure Cover Sheet: Fuel Building Emergency Exhaust Operations	33
		APF 29B-003-01	Surveillance Testing Routing Sheet (STRS): Slave Relay Test K615 Train B Safety Injection	06/03/2019
		APF 29B-003-01	Surveillance Test Routing Sheet (STRS): Manual/Auto Fast Start, Sync & Loading of EDG NE02	06/03/2019
		APF 29B-003-01	Surveillance Test Routing Sheet (STRS): Train B RHR System Inservice Valve Test	04/08/2019
		APF 29B-003-01	Surveillance Test Routing Sheet (STRS): Emergency Exhaust Filter System Train A Operability Test	04/18/2019
		ET 19-0002	Docket No. 50-482: License Amendment Request to Revise Technical Specification 3.3.5, "Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation	03/18/2019
		FD521	Flex 150KW Generator #2 Operating Instruction	2
	Procedures	AI 16C-013	Work Order Planning Feedback Guidelines	3
		AP 21A-002	Diverse and Flexible Coping Mitigation Strategies (FLEX)	3

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Program	
		FSG-05	Initial Assessment and Flex Equipment Staging	3
		STS EJ-201B	Train B RHR System Inservice Valve Test	6
		STS GG-001A	Emergency Exhaust Filtration System Train A Operability Test	23
		STS IC-260	Channel Operational Test Auxiliary Feedwater Pump Suction Pressure Low Transfer to ESW	18
		STS IC-615B	Slave Relay Test K615 Train B Safety Injection	30
		STS IC-805B	Channel Calibration of NB02 Grid Degraded Voltage, Time Delay Trip	16
		STS KJ-015B	Manual/Auto Fast Start, Sync & Loading of EDG NE02	46
		SYS GG-200	Fuel Building Emergency Exhaust Operations	33
	Work Orders		18-441767-000, 18-444651-000, 18-446778-000, 18-446778-001, 18-446779-000, 18-446779-001	
71151	Miscellaneous		System Health Report: EF - Essential Service Water	07/01/2018 to 12/31/2018
			MSPI Derivation Report - MSPI High Pressure Injection System - Unreliability Index	03/2019
			MSPI Derivation Report - MSPI High Pressure Injection System - Unavailability Index	03/2019
			MSPI Derivation Report - MSPI Cooling Water System - Unavailability Index	03/2019
			MSPI Derivation Report - MSPI Cooling Water System - Unreliability Index	03/2019
		NEI 99-02	Regulatory Assessment Performance Indicator Guideline	7
	Procedures	AI 26A-008	NRC/INPO/WANO Performance Indicator and MOR Reporting	1
		AI 34-006	Performance Indicator Program Instructions	2
		AP 26A-007	NRC Performance Indicators	11
71152	Corrective Action Documents	Condition Reports	119954, 124341, 124460, 124584, 124605, 125504, 126229, 126252, 126332, 126458, 126591, 126799, 127044, 127187, 127236, 127701, 127960, 128024, 128024, 128099, 128099, 128111, 128111, 128143, 128144, 128248, 128253, 128340,	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			128344, 128347, 128361, 128471, 128538, 128709, 128789, 128909, 129172, 129208, 129507, 129577, 130078, 130135, 130198, 130443, 131489, 131596, 131870, 132303, 132360, 132471, 132652, 132680, 132744, 132791, 133199, 133245, 133314	
	Miscellaneous		Senior Leadership Review Team Agenda	06/20/2019
			Operating Manual Uninterruptible Power Supply - Digital Energy SG Series	2008
		AIF 13C-003-01	PARB Questionnaire	2A
		AIF 13C-003-02	Work Environment Support Plan	1
		AP 18A-001	Employee Concerns Program	
		AP 36-001	Nuclear Safety Culture	
		APF 21-001-01	Shift Manager Relief Checklist: On-Coming SM Review Prior to Assuming Shift - Nights	06/18/2019
		LO14 073 00	Process and Effluent Radiation Monitoring System - Lesson Plan - GK RE 05	13
		OP 01-02	Leadership Development Program	0
		RCA 128909	Root Cause Analysis (RCA) 128909 - Level II Traditional Enforcement Violation	
	Procedures	AI 13C-003	Personnel Action Review Board (PARB)	7
		AI 28A-100	Condition Report Resolution	15
		AP 06-004	Equipment Important to Emergency Response	9B
		AP 18-001	Emerging Concerns	0
		AP 28A-100	Correction Action Program	24
		SYS BG-221	CVCS Diaphragm Valve Torquing and PMTS	11
	Work Orders		18-444690-000	
71153	Corrective Action Documents	Condition Report	127691	

WOLF CREEK GENERATING STATION – INTEGRATED INSPECTION REPORT 05000482/2019002, August 13, 2019

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ADAMS ACCESSION NUMBER: ML19225D316

☒ SUNSI Review	ADAMS:	☐ Non-Publicly Available	☒ Non-Sensitive	Keyword:
By: NO'Keefe	☒ Yes ☐ No	☒ Publicly Available	☐ Sensitive	NRC-002

OFFICE	ASRI:DRP/B	ARI:DRS/IPAT	SRI:DRS/IPAT	SRI:DRP/B	AC:DRS/EB1	C:DRS/EB2
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SIGNATURE	*/RA/*	*/RA/*	*/RA/*	*/RA/*	*/RA/*	*/RA/*
DATE	08/06/2019	08/05/2019	08/12/2019	08/02/2019	07/31/2019	08/01/2019
OFFICE	C:DRS/RCB	TL:DRS/IPAT	C:DRS/OB	C:DNMS/RIB	BC:DRP/B	
NAME	MHaire	RKellar	GWerner	GWarnick	NO'Keefe	
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