



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

November 14, 2019

EA-14-193

Mr. Christopher Church  
Site Vice President  
Monticello Nuclear Generating Plant  
Northern States Power Company, Minnesota  
2807 West County Road 75  
Monticello, MN 55362-9637

**SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT – INTEGRATED INSPECTION  
REPORT 05000263/2019003 AND 07200058/2019001**

Dear Mr. Church:

On September 30, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Monticello Nuclear Generating Plant. On October 22, 2019, the NRC inspectors discussed the results of this inspection with Mr. C. Church, Site Vice President and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspectors did not identify any finding or violation of more than minor significance.

Additionally, this inspection focused on assessing one open Condition (V.9) related to Confirmatory Order EA-14-193, issued December 21, 2015 (ML15344A459). Previously Confirmatory Order Conditions V.1, V.2, V.3, V.4, V.5, V.6, V.7, and V.8 were closed in NRC Inspection Report (IR) Nos. 05000263/2017008, 07200058/2017001, 05000263/2018004 and 07200058/2018002. The inspector review of Condition V.9 was satisfactory and the Condition is closed.

The NRC has determined that the results of this inspection, in conjunction with previously completed inspection activities related to interim milestones, provide adequate assurance that the required terms as directed by the December 21, 2015, Confirmatory Order have been satisfied by Northern States Power Company, Minnesota. Confirmatory Order EA-14-193 is closed.

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 Mohammed Shuaibi Acting for/***

Julio F. Lara, Director  
Division of Reactor Projects

Docket No. 05000263 and 07200058  
License No. DPR-22

Enclosure:  
As stated

cc: Distribution via LISTSERV®

Letter to Christopher Church from Julio Lara dated November 14, 2019.

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT – INTEGRATED INSPECTION REPORT 05000263/2019003 AND 07200058/2019001

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**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Number: 05000263 and 07200058

License Number: DPR-22

Report Number: 05000263/2019003 and 07200058/2019001

Enterprise Identifier: I-2019-003-0062 and I-2019-001-0151

Licensee: Northern States Power Company, Minnesota

Facility: Monticello Nuclear Generating Plant

Location: Monticello, MN

Inspection Dates: July 01, 2019 to September 30, 2019

Inspectors: N. Egan, Sr Physical Security Inspector  
T. Go, Health Physicist  
L. Haeg, Senior Resident Inspector  
D. Krause, Resident Inspector  
V. Myers, Senior Health Physicist  
P. Negrete, Security Specialist  
V. Petrella, Reactor Inspector  
K. Pusateri, Resident Inspector  
J. Robbins, Reactor Inspector  
N. Shah, Project Engineer  
M. Ziolkowski, Sr Physical Security Inspector  
P. Zurawski, Senior Resident Inspector

Approved By: Hironori Peterson, Chief  
Branch 3  
Division of Reactor Projects

Enclosure

## SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Monticello Nuclear Generating Plant in accordance with the Reactor Oversight Process. 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

No findings or violations of more than minor significance were identified.

### Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
LER	05000263/2019-002-00	LER 2019-002-00 for Monticello Nuclear Generating Plant, Two Manual Primary Containment Isolation Valves Found Open Resulting in a Condition Prohibited by Technical Specification	71153	Closed
OR	EA-14-193	Confirmatory Order for NDE on Dry Cask Condition V.9	92702	Closed

## **PLANT STATUS**

Monticello began the inspection period operating at approximately 100 percent power and, with the following exceptions, remained at that level throughout the inspection period. Environmental temperature and canal discharge temperatures resulted in power reductions to the following approximate power levels: July 15, 2019 (90 percent); July 18, 2019 (90 percent); and July 19, 2019 (80 percent). On September 14, 2019, the unit was down-powered to 73 percent for quarterly turbine valve testing. The unit was returned to 100 percent after each power reduction.

## **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**

### 71111.01 - Adverse Weather Protection

#### Impending Severe Weather Sample (IP Section 03.03) (1 Sample)

- (1) The inspectors evaluated readiness for impending adverse weather conditions for extreme hot weather affecting Canal Discharge Temperatures on July 16, 2019

### 71111.04Q - Equipment Alignment

#### Partial Walkdown Sample (IP Section 03.01) (3 Samples)

- (1) 12 Standby Liquid Control (SBLC) System protected while 11 SBLC in maintenance on August 5, 2019
- (2) Reactor Core Isolation Cooling (RCIC) System while protected on September 17, 2019
- (3) #13, 250 VDC System while protected on September 18, 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 "A" Reactor Protection System (RPS) train that was protected while troubleshooting "B" RPS train on July 23, 2019

71111.05Q - Fire Protection

Quarterly Inspection (IP Section 03.01) (5 Samples)

- (1) Fire Zone (FZ) 03-A - Recirculation Motor Generator area on July 26, 2019
- (2) FZ 13-C - Turbine Building 911 level motor control center on July 30, 2019
- (3) FZ 31-A - Emergency Filtration Train, 1st Floor - Division I on August 6, 2019
- (4) FZ 13-B - Rx Feed Water Pump and Lube Oil Reservoir on September 7, 2019
- (5) FZ 05-C - Fuel Pool Skimmer Tank Room on September 27, 2019

71111.06 - Flood Protection Measures

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

- (1) Vaults 2MH01, 2MH02, 2MH03, 2MH04, CP100, NMH301, NMH302 on August 2, 2019

71111.07A - Heat Sink Performance

Annual Review (IP Section 02.01) (1 Sample)

- (1) 11 Emergency Diesel Generator (EDG) Emergency Service Water (ESW) Heat Exchanger on July 15, 2019

71111.07T - Heat Sink Performance

Triennial Review (IP Section 02.02) (3 Samples)

- (1) Residual Heat Removal Division 2 Heat Exchanger, E-200B
- (2) 13 Residual Heat Removal Pump Motor Cooler, P-202C
- (3) Ultimate Heat Sink, Section 02.02d, specifically Sections 02.02d.6 and 02.02d.7 were completed

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 minimum shift staffing activities arising from labor actions on September 5, 2019

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (2 Samples)

- (1) The inspectors observed and evaluated Licensed Operator Requalification; MT-LOR-19D-001V, Crew 2 on August 12, 2019
- (2) The inspectors observed and evaluated Licensed Operator Requalification; Monticello Emergency Preparedness Evaluated Exercise on September 10, 2019

### 71111.12 - Maintenance Effectiveness

#### Routine Maintenance Effectiveness Inspection (IP Section 02.01) (2 Samples)

- (1) Structural Monitoring of Condensate Storage Tanks on August 28, 2019
- (2) 11 and 12 Emergency Diesel Generators on August 29, 2019

### 71111.13 - Maintenance Risk Assessments and Emergent Work Control

#### Risk Assessment and Management Sample (IP Section 03.01) (4 Samples)

- (1) CV-3134: "D" Moisture Separator Drain Tank Drain Valve failure on July 15, 2019
- (2) G-6: Security Diesel Engine Cycling issues on July 15, 2019
- (3) DPIS-2-129B, Recirculation Loops DP-LPCI Select interlock; Troubleshoot and Repair, on September 15, 2019
- (4) VD-9051B, "A" Control Room Ventilation Fresh Air Damper Excessive Oil Leak on September 25, 2019

### 71111.15 - Operability Determinations and Functionality Assessments

#### Operability Determination or Functionality Assessment (IP Section 02.02) (4 Samples)

- (1) Control Rod Drives (CRD) Refurbished without ASME X1 RR Plan on August 1, 2019
- (2) Emergency Core Cooling System (ECCS) Instrumentation Recirculation Riser Differential Pressure Instrumentation Switch (DPIS) failed on August 15, 2019
- (3) 12 ESW Pump Discharge Check valve missed IST Surveillance on August 22, 2019
- (4) Drywell Spray Valve thrust exceeding design basis on September 9, 2019

### 71111.18 - Plant Modifications

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

- (1) Use of low-side switches for DPIS-2-129B, high side failed on August 16, 2019
- (2) Removed bad temperature signal point from TR-2-2-31; 11 Recirculation Pump, on September 30, 2019

### 71111.19 - Post-Maintenance Testing

#### Post-Maintenance Test Sample (IP Section 03.01) (5 Samples)

- (1) OPS-G-3A, 11 EDG #2 Air start Post Maintenance Test (PMT) on July 16, 2019
- (2) RM-7858A, A Stack WRGM PMT on July 18, 2019
- (3) 12 EDG PMT on July 23, 2019
- (4) OPS-PCIV-2092; RCIC Cooling Water to Barometric Condenser PMT/TRS on September 8, 2019
- (5) MO-1751; 11 Core Spray Injection Outboard Isolation Valve PMT on September 11, 2019



## 71111.22 - Surveillance Testing

### Surveillance Tests (other) (IP Section 03.01) (1 Sample)

- (1) "A" Standby Gas Treatment System Filtration Test on July 20, 2019

### Inservice Testing (IP Section 03.01) (1 Sample)

- (1) 0255-09-IA-1; Recirculation System Valve Operability Test on September 10, 2019

### RCS Leakage Detection Testing (IP Section 03.01) (1 Sample)

- (1) 0255-01-IIC-2; Reactor Heat Removal (RHR) System Loop "B" Biennial Leakage Inspection on August 21, 2019

### FLEX Testing (IP Section 03.02) (1 Sample)

- (1) #12 Flex 480V Portable Diesel Generator G-507 on July 16, 2019

## 71114.06 - Drill Evaluation

### Select Emergency Preparedness Drills and/or Training for Observation (IP Section 03.01) (1 Sample)

- (1) Monticello Full-Scale Emergency Preparedness Drill on August 6, 2019

### Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)

- (1) Licensed Operator Requalification; (DEP) MT-LOR-19D-001V, Crew 1 on August 19, 2019

## **RADIATION SAFETY**

### 71124.05 - Radiation Monitoring Instrumentation

#### Walk Downs and Observations (IP Section 02.01) (1 Sample)

The inspectors evaluated radiation monitoring instrumentation during plant walkdowns.

- (1) The inspectors reviewed the following:

#### Portable Survey Instruments

- RO-20 Ion Chamber SN RO79; Calibration Due Date 03/14/2020
- Ludlum Model 9-3; SN 93-1; Calibration Due Date 10/04/2019
- RO-2 SN RO46; Calibration Due Date 03/03/2020
- Portable ARM DRM-2 MGP SN 534030; Calibration Due Date 06/10/2020
- Alpha/Beta Counter iSolo Canberra No. 2; Calibration Due Date 11/28/2019

#### Source Check Demonstration

- Telepole TP-5; Calibration Due Date 09/11/2020

- Small Article Monitor (SAM); Source Checked on 09/12/2019
- ARGOS 2-B at 931' Elevation Turbine Building; Calibrated on 09/12/2019

Area Radiation Monitors and Continuous Air Monitors

- A-1 Refuel Floor Low Range
- A-2 Refuel Floor High Range
- A-6 1001' Decon Area
- A-7 985' Sample Hood
- A-8 Reactor Clean Up Demineralizer Area
- A-19 Chemistry Lab
- F-1 Off-Gas Stg Bldg Foyer
- F-2 Off Gas Stg Foyer High Range
- RM-79932 DryWell CAM Rad Monitor at 935' Elevation Reactor Building

Personnel Contamination Monitors, Portal Monitors and Small Article Monitors

- ARGOS 2-B at 931' Turbine Building; Calibrated on 09/12/2019
- Small Article Monitor (SAM)
- PM-3 GEM-5; Canberra Portal Monitors

Calibration and Testing Program (IP Section 02.02) (1 Sample)

The inspectors evaluated the calibration and testing program implementation.

- (1) The inspectors reviewed the following:

Alarm Setpoint and Calibration Method Check of Personnel Contamination Monitors, Portal Monitors and Small Article Monitors

- Small Article Monitor (SAM); Source Checked on 09/12/2019
- ARGOS 2-B at 931' Turbine Building; Calibrated on 09/12/2019

Failure to Meet Calibration or Source Check Acceptance Criteria

- ARGOS 2-B at 931' Turbine Building; Calibrated on 09/12/2019

71124.06 - Radioactive Gaseous and Liquid Effluent Treatment

Walk Downs and Observations (IP Section 02.01) (1 Sample)

The inspectors walked down the following gaseous and liquid radioactive effluent monitoring and filtered ventilation systems to assess the material condition and verify proper alignment according to plant design:

- (1)
- Reactor Building Wide Range Gaseous Monitors
  - Plant Stack Wide Range Gaseous Monitors
  - Service Water Liquid Monitor
  - Discharge Canal Liquid Monitor
  - Turbine Building Normal Waste Sump Liquid Monitor
  - Standby Gas Treatment Filtration System

#### Calibration and Testing Program (Process & Effluent Monitors) (IP Section 02.02) (1 Sample)

The inspectors reviewed the following gaseous and liquid effluent monitor instrument calibrations and tests:

- (1)
  - Plant Stack Wide Range Gaseous Effluent Monitor Train "A"
  - Service Water Liquid Effluent Monitor
  - Turbine Building Normal Waste Sump Liquid Monitor

#### Sampling and Analysis (IP Section 02.03) (1 Sample)

The inspectors reviewed the following:

- (1) Radioactive Effluent Sampling and Analysis Activities
  - Plant Stack Continuous Discharge Sampling
  - Reactor Building Continuous Discharge Sampling
  - Turbine Building Normal Waste Sump Discharge Sampling

#### Instrumentation and Equipment (IP Section 02.04) (1 Sample)

The inspectors reviewed the following radioactive effluent discharge system surveillance test results:

- (1) Standby Gas Treatment System

#### Dose Calculations (IP Section 02.05) (1 Sample)

The inspectors reviewed the following to assess public dose:

- (1) Liquid and Gaseous Discharge Permits
  - Drywell Purging via Stack, MTGB2018-101
  - Plant Stack Continuous, MTGC2019-026
  - Reactor Building Vent Continuous, MTCG2019-032

##### Annual Radiological Effluent Release Reports

- 2017 Annual Radiological Effluent Release Report
- 2018 Annual Radiological Effluent Release Report

##### Abnormal Gaseous or Liquid Tank Discharges

- Abnormal Liquid Discharge, MTLB2007-002

#### 71124.07 - Radiological Environmental Monitoring Program

##### Site Inspection (IP Section 02.01) (1 Sample)

The inspectors evaluated the radiological environmental monitoring program implementation.

(1) The inspectors reviewed the following:

Walkdowns, Calibrations, and Maintenance Record Review

- Air Station M-1 Location within 11 miles at Sector NW (Control)
- Air Station M-2 Location within 0.8 miles at Sector SE
- Air Station M-3 Location within 0.6 miles at Sector ESE
- Air Station M-4 Location within 0.8 miles at Sector SSE
- Air Station M-5 Location within 2.6 miles at Sector SE
- TLD M09A County Road 75, 0.38 miles at Sector SSW
- TLD M10A County Road 75, 0.38 miles at Sector SW
- TLD M07A Parking Lot H, 0.47 miles at Sector SSE
- TLD M04S Pinewood School, 2.3 miles at Sector SE
- TLD M06S Monticello Public Works. 2.6 miles at Sector SE
- No. 5829; REMP Air Samplers Calibration; dated 02/13/2018
- Dose Assessment for Operation of MNGP During 2018 Calendar Year Calculation
- 154-Rascal Data Validation MET/Rad Data Sources; dated 07/23/2019

Environmental Sample Collections and Preparation Observation

- River Water M-8(c) Upstream of the Plant within 1000 ft Upstream of the Plant Intake
- River Water M-9 Downstream of the Plant within 1000 ft Downstream of the Plant Discharge
- Vegetation M-41 Training Center within 0.8 miles at Sector SSE
- Vegetation M-42 Biology Station Road within 0.6 miles at Sector SE

Licensee Actions in Response to Missed Sample, Inoperable Sampler, Lost TLD or Anomalous Measurement

- River Water Sampling Upstream M-8; water frozen entire month, no composite for 2018
- Air Station M-2; station lost power from the service drop, sampler was restarted on 06/08/2018 with temporary power
- Fish Samples M-8 and M-9; invertebrate samples were collected late due to unsafe river conditions; Spring 2018
- M-8 on the 4th Quarter 2018 quarterly composites were not collected; due to frozen water; dated 11/07/2018

Sampling Program for the Potential of Licensed Material Entering Groundwater

- Monitoring Well MW-9A has indicated elevated tritium level; tritium plume originated from process water that migrated through turbine building; it was discovered in 2009 and corrected in 2011 after analysis and remediation
- Monitoring Well MW-10; tritium is regularly identified on this well part of the groundwater monitoring of below grade piping under the Turbine Building

Groundwater Protection Initiative (GPI) Implementation (IP Section 02.02) (1 Sample)

- (1) The inspector reviewed licensee's actions as a result of a leak through MW-9A surveillance originated from process water that migrated through turbine building that was discovered in 2009 and it was corrected in 2011. Ongoing surveillance per Groundwater Protection Initiative at the time of the inspection.

**OTHER ACTIVITIES – BASELINE**

71151 - Performance Indicator Verification

MS06: Emergency AC Power Systems (IP Section 02.05) (1 Sample)

- (1) Unit 1 (07/01/2018 – 06/30/2019)

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

- (1) Unit 1 (07/01/2018 – 06/30/2019)

MS08: Heat Removal Systems (IP Section 02.07) (1 Sample)

- (1) Unit 1 (07/01/2018 – 06/30/2019)

BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (1 Sample)

- (1) Unit 1 01/01/2018 - 12/31/2018

OR01: Occupational Exposure Control Effectiveness Sample (IP Section 02.15) (1 Sample)

- (1) Unit 1 01/01/2018 - 12/31/2018

PR01: Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual  
Radiological Effluent Occurrences (RETS/ODCM) Radiological Effluent Occurrences Sample  
(IP Section 02.16) (1 Sample)

- (1) Unit 1 01/01/2018 - 12/31/2018

71152 - Problem Identification and Resolution

Semiannual Trend Review (IP Section 02.02) (1 Sample)

- (1) The inspectors reviewed the licensee's corrective action and adverse condition monitoring programs for potential adverse trends involving safety system leakage that might be indicative of a safety issue during the weeks of September 16 & 23, 2019.

Annual Follow-up of Selected Issues (IP Section 02.03) (2 Samples)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

- (1) Repeat issues with RCIC Primary Containment Isolation Valve (PCIV) instrumentation on September 30, 2019
- (2) Repetitive leaking vent/siphon quick connect fitting prior to completing sealing operations on Dry Shielded Canisters dated February 6 through September 30, 2019

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

##### Event Report (IP Section 03.02) (1 Sample)

- (1) LER 2019-002, Two Manual Primary Containment Isolation Valves found open resulting in a condition prohibited by Technical Specifications (ADAMS accession: ML19221B735.) Inspector review of the circumstances of this LER was conducted as part of Inspection Report 05000263/2019002. A Green Non-Cited Violation of Technical Specification 5.4.1.a had been identified in Section 71153 of that report.

#### **OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL**

##### 92702 – Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, And Alternative Dispute Resolution Confirmatory Orders

##### Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, And Alternative Dispute Resolution Confirmatory Orders (1 Sample)

- (1) The inspectors reviewed documents to determine if adequate corrective actions had been implemented associated with Confirmatory Order (CO) EA-14-193, and NRC IR Nos. 05000263/2015008 and 07200058/2014001. Specifically, the inspectors evaluated the corrective actions associated with CO Condition V.9: Completion Letter.

##### 92709 - Licensee Strike Contingency Plans

##### Licensee Strike Contingency Plans (1 Sample)

- (1) On August 31, 2019, at midnight, the contract between the United Security Professionals (USP) Local 2, who represent security supervisors, and G4S expired. In preparation for the strike/lockout, the NRC inspectors evaluated the adequacy of the licensee's contingency plan. The inspectors assessed the adequacy of the strike/lockout staffing levels, staff training and qualifications, safety conscious working environment, and site access in meeting operational and security requirements.

##### 92711 - Continued Implementation of Strike Plans During An Extended Strike

##### Continued Implementation of Strike Plans During An Extended Strike (1 Sample)

- (1) On August 31, 2019, at midnight, the contract between the United Security Professionals (USP) Local 2, which represents MNGP's security supervisors, and G4S expired. During the strike/lockout, the NRC inspectors evaluated the adequacy of the licensee's implementation of its contingency plan. The inspectors assessed:
  1. The augmented security supervisor force transition of duty

2. The continuity of security force operation
3. The impact of plant operations, minimum staffing requirements, safety conscious working environment, and site access

92712 - Resumption of Normal Operations After A Strike

Resumption of Normal Operations After A Strike (1 Sample)

- (1) On September 6, 2019, a tentative contract between the United Security Professionals (USP) Local 2, which represents MNGP’s security supervisors, and G4S was reached. On September 9, 2019, MNGP’s security supervisors returned to duty. The contract was ratified on September 24, 2019. During the resumption of normal operations following the strike/lockout, the NRC inspectors evaluated the adequacy of the licensee’s transition from a strike/lockout condition to normal plant operation.

**INSPECTION RESULTS**

Observation: Adverse Condition Monitoring Program - Safety System Leakage	71152
<p>The inspectors did a semi-annual review, in aggregate, of safety system leakage issues being monitored as part of the licensee's adverse condition monitoring program. Programmatic requirements and processes were also reviewed to determine whether active safety system leakage adverse conditions were being appropriately tracked, managed, and resolved. The inspectors also reviewed whether the licensee was appropriately monitoring adverse conditions by establishing criteria or set points for which further evaluation or action was designated. The inspectors determined, overall, that the licensee was effectively managing adverse conditions and no concerns were identified as part of this review.</p>	

Observation: RCIC Primary Containment Isolation Valve Issues	71152
<p>As part of routine corrective action program document reviews, the inspectors noted a trend in repetitive issues with reactor core isolation cooling primary containment instrumentation. Specifically, inspector's noted Quality Management Issue (QIM) 501000030703 identified differential pressure indicating switch (DPIS) DPIS-13-84 (RCIC High Steam Flow Isolation) had been found out of its As-Found tolerances on August 13, 2019 during its quarterly calibration. Review of the calibration history for this component determined that the DPIS had been outside of its As-Found tolerances six times in the last two years. In each case the DPIS was restored to within As-Left tolerances with no issues. Inspectors reviewed licensee actions to the QIM and determined the licensee appropriately implemented its corrective program in regard to identification, disposition, and correction of the issue. Given the trend, the inspectors also reviewed the licensee's extent of condition and determined it included a review of calibration history for RCIC high steam flow isolation DPIS (13-83) as well as both HPCI high steam flow switches (DPIS-23-76A &amp; DPIS 23-76B). Overall, the licensee evaluation of the As-Found switch out of tolerances were a result of drift between calibrations and remained in the conservative direction. Inspectors determined the licensee established an action to evaluate expanding the DPIS set-point bands. Overall, the inspectors did not identify any concerns as part of this review.</p>	

Observation: Dry Canister Vent/Siphon Helium Leakage	71152
<p>As part of routine corrective action reviews, the inspectors noted two licensee-identified issues relating to dry storage canister vent/siphon helium leakage. Inspectors determined these issues to be noteworthy of further review because of an open dry cask storage Confirmatory Order. Inspectors determined the licensee appropriately documented the two issues in its corrective action system. The inspectors reviewed licensee corrective actions associated with each issue and did not have any concerns. Additionally, the inspectors determined that as part of the licensee's extent of condition review, two additional helium leakage issues had been identified by the licensee. Similar reviews were conducted by the inspectors with no concerns identified. Overall, inspectors determined the licensee adequately implemented its corrective action program no concerns were identified as part of this review.</p>	

Confirmatory Order (Closed)	Confirmatory Order for NDE on Dry Cask Condition V.9 OR	92702
<p><u>Description:</u></p> <p>Condition V.9 stated "Upon completion of all terms of the Confirmatory Order, Xcel Energy shall submit to the NRC a letter discussing its basis for concluding that the Order has been satisfied." On March 26, 2016, Xcel Energy submitted a letter to describe the completion of actions taken to satisfy all the CO conditions. With the submission of the completion letter on March 26, 2019, CO Condition V.9 is considered complete. Previously CO Conditions V.1, V.2, V.3, V.4, V.5, V.6, V.7, and V.8 were closed in NRC Inspection Report (IR) Nos. 05000263/2017008, 07200058/2017001, 05000263/2018004 and 07200058/2018002.</p> <p>EA 14-193</p>		

**EXIT MEETINGS AND DEBRIEFS**

The inspectors confirmed that proprietary information was controlled to protect from public disclosure.

- On October 22, 2019, the inspectors presented the integrated inspection results to Mr. C. Church, Site Vice President and other members of the licensee staff.
- On July 25, 2019, the inspectors presented the Radioactive Gaseous/Liquid Effluent Treatment and REMP Inspections inspection results to Mr. D. Barker, Plant Manager and other members of the licensee staff.
- On August 23, 2019, the inspectors presented the Exit Meeting inspection results to Mr. D. Barker, Plant Manager and other members of the licensee staff.
- On September 13, 2019, the inspectors presented the Radiation Monitoring inspection results to Mr. C. Church, Site Vice President and other members of the licensee staff.



**DOCUMENTS REVIEWED**

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.01	Corrective Action Documents	501000029549	Down Power due to Environmental Conditions	0
		501000029601	River Appropriation Limits Reached	0
71111.04Q	Drawings	NE-36640-4	250V DC Distribution & Panel Schedule D31, D33	76
		NH-36251	P&ID RCIC (Steam Side)	80
		NH-36252	P&ID RCIC (Water Side)	82
		NH-36253	Standby Liquid Control System	80
		NX-7879-4	Standby Liquid Control System Process Diagram	002
	Miscellaneous	B.09.09-01	250 VDC System; Function and General Description of System	3
	Procedures	0913-01	No. 13 250 VDC Battery Operability Check (Division 1)	35
71111.04S	Drawings	NE-36771-4	Reactor Protection Power System Distribution Panel Y40 & Y50	77
		NX-7834-63	Elementary Diagram RPS MG Set Control	075
		NX-7834-67-10	Elementary Diagram Reactor Protection System	76
	Miscellaneous	B.09.12-05	Reactor Protection Power Supplies - System Operation	31
71111.05Q	Fire Plans	A.3-03-A	Fire Strategy for Zone 3-A - Recirculation Motor Generator Set Room	8
		A.3-05-C	Fire Strategy for Zone 5-C - Fuel Pool Room	6
		A.3-13-B	Fire Strategy for Zone 13-B - Turbine Building (Feed Water Pump Area) - Elevation 911	13
		A.3-13-C	Fire Strategy for Zone 13-C - Turbine Building Basement - MCC Area East	11
		A.3-31-A	Fire Strategy for Zone 31-A - Emergency Filtration Train Building - 1st Floor (Division 1)	11
71111.06	Calculations	07-021	Reactor Building, Turbine Building, & Intake Structure Water Height – Internal Flooding	1-A
		07-029	Reactor Building, Turbine Building, & Intake Structure Water Height – Internal Flooding	0-B
	Drawings	NF-36763	Raceways, Grounding & Direct Buried Cable Runs – South Turbine Generator Building	81
	Miscellaneous	DBD-S.04	Intake Structure	7
71111.07A	Work Orders	700040957	EDG ESW Heat Exchanger Performance Test	08/29/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.07T	Calculations	07-045	RHR Pump Motor Model 5K511DT5410 Cooling Coil Minimum Flow Evaluation	2A
		97-056	Determination of RHR Heat Exchanger U-Values and K-Values at Various Flow Conditions	3
	Calibration Records		LT-1852 and LT-1853 Calibration Records	
	Corrective Action Documents	01517655	13 RHR Motor Outlet Cooling Flow Less Than Required	04/03/2016
		501000007157	13 RHR Motor Flow < 2 gpm via FI-4955	01/11/2018
		501000021445	P-109D Low Pressure During Surveillance	12/27/2018
		501000026135	B FSW Leak in Elbow	04/23/2019
	Corrective Action Documents Resulting from Inspection	501000030960	NRC Question	08/19/2019
		501000030967	2019 UHS - A.6 River Temp Question	08/20/2019
		501000031066	2019 UHS - OG Comp Leak Into Cooling SYS	08/22/2019
	Drawings	NH-36664	P&ID RHR Service Water & Emergency Service Water Systems	95
		NH-36665	P&ID Service Water System & Make-Up Intake Structure	104
	Miscellaneous		11 CW PMP Pit Level and the 12 CW PMP Pit Level Trend Report	
			1R29 SW/MIC Results Summary Table	
			1R28 SW/MIC Results Summary Table	
			IST-ESW Pump 14 Vibration Trends	
			IST-ESW Pump 13 Vibration Trends	
			IST - ESW Pump 12 Vibration Trends	
			IST - ESW Pump 11 Vibration Trends	
			IST - RHRSW Pump 14 Vibration Trends	
			IST - RHRSW Pump 13 Vibration Trends	
			IST - RHRSW Pump 12 Vibration Trends	
			IST - RHRSW Pump 11 Vibration Trends	
NDE Reports	XCEL11-MN1-03	Final Eddy Current Inspection Report NO: XCEL#11-MN1-03 of Residual Heat Removal RHR HX E-200B for Monticello Nuclear Generating Plant RFO25 - March 2011	03/24/2011	
Procedures	A.6	Acts of Nature	60	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		EWI-11.01.14	Buried Piping and Tanks Inspection	1
		FP-PE-FAC-01	FAC Program	17
		FP-PE-SW-01	SW/MIC Program	14
		FP-PE-UPT-01	Underground Piping and Tanks Integrity Program	2
	Work Orders	00394234	PM 4058-1 ("A" RHR Room MTR Cooler Cleaning & Test)	04/09/2011
		00440540	PM 4058-1 ("A" RHR Room MTR Cooler Cleaning & Test)	04/20/2013
		00491126	PM 4126 (Inspect West Service Water Bay)	04/24/2015
		00491127	PM 4125 (Inspect East Service Water Bay)	05/07/2015
		00504142	P-202C/MTR, Replace Motor Cooling Coil	09/01/2015
		00519464	1136-02 RHR Heat Exchanger Efficiency Test - DIV II	02/23/2017
		00529075	0255-11-III-3 13 ESW Pump Flow Test	04/03/2016
		00531773	1404-01 11 EDG ESW Heat Exchanger PRFM Test	11/22/2016
		00533934	PM 4126 (Inspect West Service Water Bay)	05/14/2017
		00534534	0255-05-IA-1-2 "B" RHRSW QRTRLY PMP & Valve Test	06/30/2016
		00534919	0255-11-III-3 13 ESW Pump Flow Test	07/07/2016
		00535068	0255-05-IIC-1 RHRSW System Leakage Test - Loop A	04/25/2017
		00535069	0255-11-IIC-1 ESW System Leakage Test - Loop A	04/22/2017
		00535070	0255-11-IIC-3-1 EDG-ESW Loop A Leak TST-Access Compon	07/10/2016
		00535071	0255-11-IIC-3-2 EDG/ESW Leak Test - Loop A Buried Piping	11/22/2016
		00540063	0255-05-IA-1-2 "B" RHRSW QRTRLY Pump & Valve Test	09/30/2016
		00540526	0255-11-III-3 13 ESW Pump Flow Test	10/14/2016
		00545290	0255-05-IA-1-2 "B" RHRSW QRTRLY Pump & Valve Test	12/28/2016
		00545647	0255-11-III-3 13 ESW Pump Flow Test	01/06/2017
		00549811	0255-05-IA-1-2 "B" RHRSW QRTRLY Pump & Valve Test	03/30/2017
		00550108	0255-11-III-3 13 ESW Pump Flow Test	04/04/2017
		00554448	0255-05-IA-1-2 "B" RHRSW QRTRLY Pump & Valve Test	06/30/2017
		00554799	0255-11-III-3 13 ESW Pump Flow Test	07/06/2017
		533935	E Service Water Bay	09/22/2016
		700014461	RHR Heat Exchanger Efficiency Test	12/18/2018
		700014471	"B" RHRSW Quarterly Pump and Valve Tests	12/28/2017
		700017684	13 ESW Quarterly Pump and Valve Tests	10/05/2017

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		700017685	13 ESW Quarterly Pump and Valve Tests	01/11/2018
		700021812	Comprehensive 12 RHRSW Pump and Valve Tests	04/02/2018
		700026492	RHR Pump 13 and Core Spray Pump 11 Motor Cooler Chemical Cleaning	06/18/2018
		700027873	"B" RHRSW Quarterly Pump and Valve Tests	05/11/2018
		700028135	13 ESW Quarterly Pump and Valve Tests	07/05/2018
		700028543	West Service Water Bay Inspection/Dredging	05/14/2019
		700028562	EDG ESW Heat Exchanger Performance Test	09/05/2018
		700031712	RHR Service Water System Leakage Test - Loop B	04/24/2019
		700031715	Emergency Service Water System Leakage Test - Loop B	05/06/2019
		700031716	EDG-ESW System Leakage Test Loop B Accessible Pressure Boundary Components	08/09/2018
		700032957	13 ESW Comprehensive Pump and Valve Test	04/04/2018
		700033107	"B" RHRSW Quarterly Pump and Valve Tests	06/26/2018
		700033331	13 ESW Quarterly Pump and Valve Tests	10/10/2018
		700033406	East Service Water Bay Inspection/Dredging	04/27/2019
		700036565	"A" RHRSW Quarterly Pump and Valve Tests	12/06/2018
		700037422	"B" RHRSW Quarterly Pump and Valve Tests	09/27/2018
		700037458	"B" RHRSW Quarterly Pump and Valve Tests	12/28/2018
		700038490	13 ESW Quarterly Pump and Valve Tests	01/09/2019
		700042061	12 Emergency Diesel Generator / 12 ESW Quarterly Pump and Valve Tests	02/01/2019
		700045733	"B" RHRSW Quarterly Pump and Valve Tests	03/29/2019
		700046070	13 ESW Quarterly Pump and Valve Tests	04/12/2019
		700050083	"B" RHRSW Quarterly Pump and Valve Tests	06/27/2019
		700054695	MT:1:ESW:ESW5-4-HBD	1
700054695	Pipe	1		
71111.11Q	Miscellaneous		Monticello Nuclear Generating Plant Emergency Plan Full Exercise	09/10/2019
		MT-LOR-19D-001V - RQ-SS-113	Simulator Exercise Guide (Crew 2)	4
71111.12	Corrective Action	501000018660	11 Emergency Diesel Generator Failed to Load	10/15/2018

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
	Documents	501000020519	12 EDG Oil Temperature Trending Down	0	
		501000020848	11 EDG Coolant Leak	0	
		501000020998	12 DGN Engine Signature Analysis Results	0	
		501000021007	11 DGN Engine Signature Analysis Results	0	
		501000024068	Coolant Leak on 11 EDG	0	
		501000025369	11 EDG Procedure Step Not Within Band	0	
		501000025405	Portions of 11 EDG PM and Test Not Performed	0	
		501000027532	NRC Questions on 12 EDG	0	
		501000027722	Small Oil Leak on 11 EDG	0	
		501000028287	Monticello Nuclear Generating Plant Maintenance Rule Condensate Storage Tank Condition Monitoring	0	
		501000029082	11 EDG Oil Seeps	0	
		501000029844	G-3A, 11 EDG Low Oil Level	0	
		501000030102	11 EDG Governor Leaking	0	
		501000030576	11 EDG Oil Pump Increased Oil Leak	0	
		Engineering Evaluations	501000018660	11 Emergency Diesel Generator Failed to Load	1
	602000006755		Maintenance Rule Functional, MSPI and Equipment Reliability Clock Reset Failure Evaluation	10/23/2018	
	NUC2017147		Condensate Storage Tanks, Desludge, Inspection and Repair	0	
	Miscellaneous	2019 Period 1	Plant Health Report--System Report, "Condensate and Reactor Feedwater System"		
		2019 Period 1	System Report--Emergency Diesel Generator		
	Operability Evaluations	501000018660	Past Operability Evaluation for 11 Emergency Diesel Generator Failure to Load	10/24/2018	
	Work Orders	00446817	1385 Periodic Structural Online Inspection	11/04/2013	
		700006331	1385 Periodic Structural Inspection	09/06/2018	
		700036105	Condensate Storage Tank Aging Management Walkdown Completion	12/15/2018	
	71111.13	Corrective Action Documents	501000029418	Security Diesel Test Abort due to Speed Control Issues	0
			501000029526	CV-3134 Not Controlling Level	0
			501000030792	DPIS-2-129B did not Reset	0
			501000031945	VD-9051B Excessive Oil Leak	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Work Orders	700059052	Diesel Engine Emergency Security Power	07/15/2019
		700063297	VD-9051B Excessive Oil	09/17/2019
71111.15	Corrective Action Documents	501000030066	Containment Spray Valves Thrust Exceeds Calculations	0
		501000030237	CRDs Refurbished without ASME XI RR Plan	0
		501000031053	ESWW-1-2 IST Test not Performed in 1R29	0
	Engineering Changes	601000001705	Use of Low Side Contact for DPIS-2-129B	0
	Miscellaneous Procedures	2019-29-041	ASME Section XI Repair/Replacement Plan	08/05/2019
		FP-PE-MOV-07	Motor Operated Valve Program	3
71111.18	Engineering Changes	601000001574	Remove Bad Temperature from TR-2-2-31, Recirculating Pump "A" Motor Temperature Element	05/31/2019
		601000001705	Low Side Output Switch for DPIS-2-129B	08/16/2019
71111.19	Work Orders	700023229	12 Emergency Diesel Generator #1 Air Start PMT	07/25/2019
		700039721	11 Core Spray injection Outboard Valve PMT	09/12/2019
		700039817	4100-2, 11 Diesel Generator G-3A #2 Air Start System	07/16/2019
		700051669	Stack "A" Effluent Noble Gas Monitor PMT	07/20/2019
		700052015	RCIC Quarterly Pump and Valve Tests	08/16/2019
71111.22	Work Orders	700020892-0010	"A" Train Standby Gas Treatment System Filter Tests	08/16/2017
		700024592-0020	"A" Train Standby Gas Treatment System Filter Tests	02/08/2018
		700040870	G-507-Flex Generator Annual Preventative Maintenance	07/15/2019
		700052934	Recirculation System Valve Operability Test	08/25/2019
		700054406	0253-01A, Standby Gas Treatment Train "A" Monthly Test	07/20/2019
		700056662	Residual Heat Removal System Leakage Test - Loop B	08/20/2019
71114.06	Miscellaneous		Monticello Emergency Plan Full Scale Drill Guide/Scenario	08/06/2019
		MT-LOR-19D-001V	Licensed Operator Requalification; (DEP) Crew 1	08/19/2019
71124.05	Calculations	Mirion Service	Calibration of the Canberra Fastscan WBC System at the XCel Energy Monticello Nuclear Generating Plant	02/20/2019
	Calibration Records	0908-177 UTC516834	NSPM RP Instrument Response Investigation Report	02/14/2018
		309888/3098889	NSPM RP Instrument Response Investigation Report	03/21/2018
		AZ-11 UTZ No:478971	ARGOS Calibration	09/12/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Model 89-400	J.L. Shepherd & Associates Model 78-2M Calibrator	01/28/1991
		NSP No. 248 Source No. 81622	Certificate of Radioactivity Calibration of Cs-137 Sealed Source Containment High Range Radiation Monitor	11/01/1981
		PM-7-1 UTC 310244	Portal Monitor Calibration PM-7	06/04/2018
		TP-5 UTC 515541	MG Telepole Calibration	09/11/2019
		WO 700014151-0020	Containment High Range Radiation Detectors Calibration Procedure	04/24/2019
	Corrective Action Documents	501000009743	RP Procedure R.09.14 Outdated Info	03/20/2018
	Corrective Action Documents Resulting from Inspection	501000031850	NRC Observation of Containment High Range Monitor Cal Source Strength	09/13/2019
	Procedures	0428-02	Containment High Range Radiation Detector Calibration Procedure	9
		R.09.14	Micro REM Calibration and Functional Check	10
		R.09.62	ARGOS Contamination Monitors Function Check and Calibration	16
71124.06	Calibration Records	Radiation Safety And Control Services Technical Support Document 17-004	Primary Calibration of Turbine Building Normal Waste Sump at Monticello Nuclear Generating Plant	3
	Corrective Action Documents	501000021912	"B" Stack Wide Range Gaseous Monitor Remains Non-Functional	01/12/2019
		501000022675	Traceability for Stack and Reactor Building Vent Wide Range Gaseous Monitor Calibration	02/01/2019
		501000023937	Incorrect Calibration Coefficient In RADEAS	03/07/2019
	Engineering Changes	28235	Methodology for Determining Stack Noble Gas Release Rates	
	Procedures	I.02.06	Airborne Continuous Release Report	3
		I.02.08	Airborne Batch Release Report	3
		I.02.09	Stack/Reactor Building Vent Sample Analysis	1

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		I.05.09	Stack/Vent Tritium Sampling	11
		I.05.26	Stack Noble Gas Sampling	6
	Work Orders	700021755-0010	Reactor Building Vent Wide Range Gas Monitor Calibration	03/21/2018
		700034829-0010	Service Water Monitor Calibration	11/07/2018
		700036453-0010	Stack Wide Range Gas Monitor Calibration	12/13/2018
		700051669-0010	Stack "A" Effluent Noble Gas Monitor	07/15/2019
71124.07	Corrective Action Documents	501000013464	Missed REMP Air Sample Plant Access Road	06/20/2018
		501000013755	The M0-5S & M0-5SE Environmental REMP TLDs, One Came Up Missing, the Other Damaged	06/28/2018
		603000000923	Missed 2018 REMP Sample Tracking	01/03/2018
	Corrective Action Documents Resulting from Inspection	501000030003	NRC Observation during REMP Walkdown; M-4 Air Sample was Facing Away from the Plant	07/24/2019
	Engineering Evaluations	1015118 Priority Index Worksheet	Guideline For Implementing a Groundwater Protection Program at Nuclear Power Plants	08/23/2017
		AT-0175	10 CFR 50.75(g) Files	09/09/2009 - 07/30/2011
		No. 8010; Docket No. 50-263	ATI Environmental Midwest Lab; Annual Radiological Environmental Operating Report	01/01/2018 - 12/31/2018
		Project #4583-01	2017 ANNUAL GROUNDWATER MONITORING REPORT from Carlson/McCain Engineering Report	05/01/2017
	Miscellaneous	ODCM-07.01	Offsite Dose Calculation Manual; Radiological Environmental Monitoring Program	25
	Procedures	1.05.41	Annual Land Use Census and Critical Receptor Identification	10
		1308	MET Tower Inspection Procedure	21
	Self-Assessments	2018 ARERR	2018 Annual Radioactive Effluent Release Report	05/13/2019
71151	Miscellaneous	QF0739	NRC Performance Indicator Data; Emergency Preparedness – MSPI AC Power; 3rd quarter 2017 – 2nd quarter 2018	08/27/2019
		QF0739	NRC Performance Indicator Data; Emergency Preparedness – MSPI High Pressure Injection Systems; 3rd quarter 2017 – 2nd quarter 2018	08/27/2019
		QF0739	NRC Performance Indicator Data; Emergency Preparedness – MSPI Heat Removal Systems; 3rd quarter 2017 – 2nd	08/27/2019



Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			quarter 2018	
	Procedures	QF0445	NRC/INPO/WANO Collection and Submittal Forms Fuel Performance	3
71152	Corrective Action Documents	50100001614	DPIS-13-84 Out of asFound	0
		501000008279	DPIS-13-84 Found out of as Found	0
		501000015236	DPIS-13-84 Out of as Found	0
		501000019912	DPIS-13-84 Found Outside as-found	0
		501000024127	V-EAC-14B (B CRV) Oil Pressure Low	0
		501000027478	DPIS-13-84 Out of as-found	0
		501000030703	DPIS-13-84 Out as-found	0
	Procedures	501000027329	Drywell Identified Leakage	0
		501000027677	PI-4430B Freon Leak	0
FP-OP-ACM-01		Adverse Condition Monitoring Plan Process	11/29/2016	
71153	Miscellaneous	501000028365	Root Cause Evaluation Report: Primary Containment Isolation Valves Found Open	1
92702	Corrective Action Documents	500001400973	ISFSI DSC 15 Helium Leak When Sealing	0
		501000018344	Unable to Complete DSC Siphon Cover Weld	
		501000018399	NRC Resident Questions 10-10-18	0
		501000021865	DSC-14 Quick-Connect Leak During Closure	0
		501000023368	DSC-12 Leaking Vent Fitting	0
	Miscellaneous		XcelEnergy Confirmatory Order, EA-14-193, Closure Letter	03/26/2019
		50100021865	Prompt Operability Determination	0
92709	Procedures	CD 11.5	Strike Contingency Plan	4
92711	Miscellaneous	QF 1727	10CFR20 Work Hour Limits Waiver (Penrod)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Jelen)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Williams)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Broich)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Peterson)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Ergen)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Morgan)	09/05/2019
		QF 1727	10CFR20 Work Hour Limits Waiver (Flood)	09/05/2019
	QF 1727	10CFR20 Work Hour Limits Waiver (Maciej)	09/05/2019	
Procedures	FP-S-FMP-01	10CFR20 Fatigue Management Fleet Procedure	7	

