U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-440/89012

Docket No. 50-440 License No. NPF-58

Licensee: The Cleveland Electric Illuminating Company
10 Center Road
Perry, OH 44081

Facility Name: Perry Nuclear Power Plant, Unit 1

Inspection At: Perry Site, Perry, Ohio

Inspection Conducted: June 27 through October 23, 1989

Inspector: T. E. Vandel for F. A. Maura — Date 11-2-89

T. E. Vandel for V. P. Lougheed — Date 11-2-89

T. E. Vandel for M. R. Merholz — Date 11-2-89

Approved By: T. E. Vandel for Monte P. Phillips, Chief, Operational Programs Section — Date 11-2-89

Inspection Summary

Inspection on June 27 through October 23, 1989 (Report No. 50-440/89012(DRS))
Areas Inspected: Routine announced inspection by regional based inspectors of the containment integrated leak rate test (CILRT) and drywell bypass test procedures; witnessing portions of the CILRT and the drywell bypass test; review of the CILRT and drywell bypass test results; local leak rate test methods and results; and review of actions taken to correct a problem associated with the leakage rate performances of the MSIVs. NRC modules utilized during this inspection included 70307, 70313, 70323, 61720, 90713 and 92700.
Results: Two violations were identified (failure to Type B test gasketed penetrations - Paragraph 4.c; and failure to perform an adequate review of a procedure revision - Paragraph 4.c).

The containment failed its first operational integrated leak rate test due to the high leakage through an untested gasketed penetration.

The licensee has experienced 11 out of 18 MSIV leakage rate failures since the unit became operational. So far the repairs have consisted of lapping or machining the valve seats. Four stems have been replaced. Followup on future valve performance and valve internals data gathering to resolve the problem is an Open Item.

Two additional open items were identified regarding local leak rate testing procedural controls to guarantee penetration test pressure (Paragraph 6.b), and revision of USAR Table 6.2.32 and 6.2.40 to require testing of RCIC exhaust check valve (Paragraph 4.c).

DETAILS

1. Persons Contacted

Cleveland Electric Illuminating Company

**V. Concel, Mechanical/ISI Performance Unit (MIPU) Lead
**G. A. Dunn, Supervisor, Compliance
**W. Farrell, Operations Engineer
*S. F. Kensicki, Director, Perry Plant Technical Department (PPTD)
*R. Matthys, Lead Mechanical, Nuclear Quality Assurance Department (NQAD)
*K. R. Pech, Manager, Technical Section
J. Rivers, Lead In-Service Inspection (ISI) Engineer
B. Schneidman, Operations Engineer, Licensing Compliance

Quadrex Corporation

*D. Peyvan, ILRT Engineer

United Engineer Service Corporation

*R. Shirk, ILRT Engineer

US NRC

*P. Hiland, Senior Resident

*Attended preliminary exit interview of July 7, 1989.
**Attended exit interviews of July 7 and October 23, 1989.

The inspectors also interviewed other licensee employees including members of the operations and technical staff.

2. Licensee Event Report

(Closed) Licensee Event Report No. 89006 (440/89006-LL): All four main steam line (MSL) penetrations failed their local leak rate test. On March 1989, the licensee reported that all four MSLs had exceeded their allowable Technical Specification limit of 25 scfh. Table 1 shows the history of MSL reported leakage rates. The MSIVs at Perry are 26 inch Y-pattern stop valves manufactured by Atwood and Morrill.

Table 1 - History on MSL As Found Leakage Rate

Leakage rate, in SCFH

	MSL A	MSL B	MSL C	MSL D
July 1987	>42.4	>42.4	32	>42.5
September 1987	Not tested	610	Not tested	Not tested
February - March, 1989	261	64	265	45

Additional testing showed that the "A" and "C" inboard and outboard main steam isolation valves (MSIVs) and the "D" outboard MSIV were the main contributors to the MSL leakage. Other valves requiring rework were the "B" MSL leakage control system (LCS) steam tunnel isolation valve and outboard MSIV drain valve, and the "D" MSL-LCS valves. Specific leakage rate values for the MSIVs were not available. During prior outages (July and September 1987) excessive leakage rates were experienced, as noted in Table 1, by the "A" and "C" inboard and outboard MSIVs and the "D" inboard MSIV (July 1987), and the "B" outboard MSIV (September 1987). In summary, 11 out of the 18 MSIVs tested since the plant became operational have experienced excessive leakage rate, but only three MSIVs have experienced repeated failures (the "A" inboard and outboard and the "B" outboard MSIVs).

A review of the maintenance records indicated that most of the repairs performed consisted of machining or lapping the valve seats. Two stems were replaced in 1987 (A and B outboard) and two more in 1989 (B outboard and inboard). Guide rib repairs were required on two valves (A and C outboard) in 1989. General Maintenance Instruction GMI-096, "MSIV Disassembly, Repair, and Reassembly Instruction" was upgraded prior to the 1989 outage to include the recommendations in NUREG-1169; however, the procedure was later revised during the outage to delete the performance of certain data gathering steps. As a result the licensee did not have a complete set of measurements, such as radial clearance between the valve bore and the disc/piston assembly, for each valve which was worked. The inspectors indicated to the licensee that all valve parameters which may have an effect on proper valve operation and leak tightness should be obtained, otherwise it would be very difficult to determine the root cause of repeated failures. Procedural improvements to ensure all necessary valve data would be obtained during disassembly and after repairs were performed, in order to be able to correct the suspected causes of the valve failure as well as to be able to rule out other possible causes, are an Open Item (No. 440/89012-01(DRS)) pending correction of the valve performance deficiencies during the next refueling outage.

The licensee is studying an improved anti-rotation poppet/pilot design to eliminate present concerns regarding seat-to-poppet out of roundness, guide rib wear, poppet-to-body clearance, etc. According to the licensee, plans are to purchase the improved design prior to the next refueling outage, but only to install the components on valves needing repair.

3. Containment Integrated Leak Rate Test Procedure Review (70307)

a. Procedure Review

The inspectors reviewed surveillance instruction SVI-T23-T0394, "Integrated Leak Rate Test," Revision 1, dated June 26, 1989, including Temporary Changes 1-8, and Operations Manual Procedure PAP-1120, "Type A, B, and C Leak Rate Test and Accountability Programs, Revision 1, dated February 22, 1989, relative to the requirements of 10 CFR Part 50, Appendix J, ANSI N45.4-1972, and the Technical Specifications. All inspectors comments were satisfactorily resolved.

b. Clarifications of Appendix J Requirements

To ensure the licensee's understanding of Appendix J requirements, and other applicable requirements, the inspectors conducted numerous discussions with licensee personnel during the course of the inspection. The following is a summary of the clarifications discussed with the licensee.

(1) The Type A test length must be 24 hours or longer to use the mass point method of data reduction. If tests of less than 24 hours are planned, the Bechtel Topical Report, BN-TOP-1, must be followed in its entirety except for any Section which conflicts with Appendix J or Technical Specification requirements. For either methodology, the acceptance criteria is that the measured leakage at the 95% upper confidence limit must be less than 75% of the maximum allowable leak rate for the pressure at which the test was performed.

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

(a) In the case where individual leak rates are assigned to two valves in series (both before and after the RA), the penetration through leakage would simply be the smaller of the two valves' leak rates.

(b) In the case where a leak rate is obtained by pressurizing between two isolation valves and the individual valve's leak rate is not quantified, the as-found and as-left penetration through-leakage for each valve would be 50% of the measured leak rate if both valves are repaired.

(c) In the case where a leak rate is obtained by pressurizing between two isolation valves and only one valve is repaired, the as-found penetration leak rate would conservatively be the final measured leak rate, and the as-left penetration through leak rate would be zero (this assumes the repaired valve leaks zero).

(3) Penetrations which are required to be Type C tested, as described in the FSAR, the SER, or the Technical Specifications, must be vented inside and outside the containment during the CILRT. All vented penetrations must be drained of water inside the containment and between the penetration valves to ensure exposure of the containment isolation valves to containment air test pressure. The degree of draining of vented penetrations outside of containment is controlled by the requirement that the valves be subjected to the post-accident differential pressure, or proof that the system was built to stringent quality assurance standards comparable to those required for a seismic system.

(4) Whenever penetration configurations during a CILRT deviate from the ideal, the results of the LLRTs for such penetrations must be added as a penalty to the CILRT results at the 95% confidence level. This penetration leakage penalty is determined using the "minimum pathway leakage" methodology. This methodology is defined as the minimum leakage value that can be quantified through a penetration leakage path (e.g., the smallest leakage through two valves in series). This assumes no single active failure of redundant leakage barriers. Additionally, any increase in containment sump, fuel pool, reactor water, or suppression pool level during the course of the CILRT must be taken as a penalty to the CILRT results. If penalties exist, they must be added (subtraction is never permitted) to the upper confidence level of the CILRT results.

(5) The start of a CILRT must be noted in the test log at the time the licensee determines that the containment stabilization has been satisfactorily completed. Reinitializing a test in progress must be "forward looking," that is, the new start time must be that time at which the decision to restart is made or a future data set. This also implies that the licensee has determined that the test has failed, and has enough data to quantify the leakage rate. Any deviation from these positions should be discussed, and documented, with the NRC inspector as they occur to avoid later invalidations of the test results. Examples of acceptable deviations of reinitializing the start time of the test in the past are: time at which a leaking penetration which has an obvious effect on the test data was secured, accidental opening and later closing of a valve which has an obvious effect on the test data, the time at which an airlock outer door was closed and the inner door was open.

(6) The supplemental or verification test should start within one hour after the completion of the CILRT. If problems are encountered in the start of the supplemental test, data recording must continue and be considered part of the CILRT until the problems are corrected and the supplemental test can begin.

(7) For the supplemental test, the size of the superimposed leak rate must be between 0.75 and 1.25 times the maximum allowable leak rate, La. The higher the value, the better. The supplemental test must be of sufficient duration to demonstrate the accuracy of the test. The NRC looks for the results to stabilize within the acceptance criteria rather than the results being within the acceptance criteria. Whenever the BN-TOP-1 methodology is being used, the length of the supplemental test cannot be less than approximately one-half the length of the CILRT.

(8) During a CILRT, it may become necessary to reject or delete specific sensors or data points due to drifting or erroneous sensors, or data outliers. Data rejection criteria should be developed and used so that there is consistent, technical basis for data rejection. One example of an acceptable method for data outliers is described in an Appendix ANSI/ANS 56.8-1981. Sensor data rejection criteria should be plant specific and based upon a sensor's trend relative to the average scatter, slope and/or absolute output of the sensor.

(9) An acceptable method for determining if the sum of Type B and C tests exceeds the 0.60 La Appendix J limits is to utilize the "maximum pathway leakage" method. This methodology is defined as the maximum leakage value that can be quantified through a penetration leakage path (e.g., the larger, not total, leakage of two valves in series). This assumes a single active failure to the better of two leakage barriers in series when performing Type B or C tests.

(10) Test connections between containment isolation valves must be administratively controlled to ensure their leak tightness or otherwise be subject to Type C testing. One way to ensure their leak tightness is to cap, with a good seal, the test connection after its use. Test connections between containment atmosphere and inboard isolation valve which exit containment must have two isolation valves in addition to the cap. Proper administrative controls should ensure valve(s) closure and cap re-installation within the local leak rate testing procedure, and with a checklist prior to unit restart.

(11) Whenever a valve is replaced, repaired, or repacked during an outage for which Type A, B, and/or C surveillance testing was scheduled, local leak rate testing for the as-found as well as the as-left condition must be performed on that penetration. In the case of a replaced valve, the as-found test can be

waived except during outages when a Type A test is scheduled, if no containment isolation valve of similar design exists at any of the company's nuclear sites.

(12) The periodic retest schedule for each penetration subject to Type B or Type C testing, except for airlocks and penetrations employing a continuous leakage monitoring system, shall be every refueling outage, but in no case shall the interval be greater than two years.

4. Containment Integrated Leak Rate Test Witnessing (70313)

a. The inspectors reviewed the calibration data and determined all the instruments used in the CILRT had been properly calibrated and that the correct weighting factors had been placed in the computer program as required. The following instrumentation was used throughout the test:

Type	Quantity
RTDs	20
Humidity	12
Pressure gauges	2
Flowmeter	1

b. Temperature Survey

The inspectors witnessed the temperature survey performed on July 4, 1989. Containment ventilation fans were off throughout the survey. Five to seven readings were taken for each subvolume covered by each RTD. The largest temperature variation measured within any subvolume was 1.4°F. A check against the data acquisition reading showed a maximum deviation of 2.4°F. The inspectors had no concerns regarding the results of the temperature survey.

c. Witness of Test

The inspectors witnessed portions of the CILRT on July 6-7, 1989, and noted that test prerequisites were met and that the appropriate revision to the surveillance procedure was followed by test personnel. Valve lineup for the following systems were verified correct to ensure that no fluid could enter the containment atmosphere and that proper venting and draining was provided.

	Penetrations
Nitrogen Supply	117
Safety Related Instrument Air	116, 304
Post Accident Sampling (except valves P87, F157, F158, & F161)	318, 413
Reactor Core Isolation Cooling	106, 422
Service Air	308

	Penetrations
Penetration Pressurization	305, 312
Instrument Air	306
Fire Service CO_2	210

During the valve lineup review the inspectors noted that valve 1E51-F068 was required to be closed for the CILRT. Valve F068 is a normally open, motor operated valve in the RCIC turbine steam exhaust line to the suppression pool. The valve receives no automatic isolation signal. The CILRT valve lineup requiring valve F068 closed was in conformance with the UFSAR Tables 6.2.32 and 6.2.40. The licensee was given a copy of the NRC's decision in a similar case involving the LaSalle Station, which also applied to the Clinton Station. The licensee was informed that both UFSAR tables are were in error and should be corrected at the next amendment submittal. The tables should show that valve 1E51-F068 is to remain open during the CILRT so that valve F040 is the containment boundary, and that both valves F068 and F040 will be Type C tested. This is an Open Item (No. 440/89012-02(DRS)) pending revision to the UFSAR. The licensee revised its CILRT procedure to consider valve F040 the isolation valve for the test.

After 10 hours the Type A test leakage rate at the 95% UCL was > 0.300 wt%/day and increasing, or twice the maximum allowable level. A portion of this leakage was traced to a flange on a seal leakoff line of a residual heat removal relief valve (E12-F055A). Prior to tightening the flange the local leakage rate was measured to be at least 1.62 scfm or approximately 45% of La. The licensee stated that the valve had maintenance performed on it during the refueling outage and that the flange could only be tested during the Type A test. No as-found results were available. The flange was last tested as part of the preoperational CILRT performed in 1985. Since that time valve F055A had been worked on twice requiring breaking of the flange (Work Orders No. 86-1673 and 87-6296). 10 CFR Part 50, Appendix J, Paragraphs II.G and III.D.2 require that the flange on valve E12-F055A and any other similar connection be Type B tested every refueling outage and prior to the requirement for containment integrity if opened for any reason. Failure to test the seal leakoff flange of valve E12-F055A after the performance of Work Orders No. 86-1673 and 87-6286 is a violation of 10 CFR Part 50, Appendix J requirements (No. 440/89012-03).

The licensee also flooded the main steam lines upstream of the Main Steam Isolation Valves (MSIVs) in order to seal a possible leakage path. The MSIVs are not required to be included in the CILRT results as they constitute a separate source term for 10 CFR Part 100 calculations. Following flooding of the main steam lines, the licensee discovered that the reactor vessel water level was decreasing while drywell water level was increasing. The licensee determined that the leakage was due to an open drain line in the

main steam system. This line was vented as part of the CILRT. Failure to properly review the change to the procedure, which allowed flooding of the main steam lines, against existing procedure requirements is considered a violation of 10 CFR Part 50, Appendix B, Criterion VI (No. 440/89012-04).

The flooding of the drywell required the licensee to enter containment, realign CILRT-configured valves to drain the drywell, then align the valves back to their CILRT status. Following all these operations the test was restarted. The inspectors only witnessed the first four hours of the second test. Early data indicated the containment leakage rate was much lower than during the first attempt.

5. Test Results Evaluation (70323)

a. CILRT Data Evaluation

A 24 hour CILRT was performed during July 7-8, 1989, at 25 psia following satisfactory completion of the required temperature stabilization period. Data was collected every 15 minutes. The inspectors independently evaluated leak rate data using mass point time formulas to verify the licensee's calculations of the leak rate and instrument performance. There was good agreement between the inspectors' and licensee's results as indicated by the following summary (units are in weight percent per day).

Measurement	Licensee	Inspectors
Leak rate measured during CILRT (Lam)	0.027	0.027
Lam at upper 95% confidence level	0.029	0.029

Appendix J acceptance criteria at 95% UCL: < 0.75 La = < 0.150 weight percent per day.

At the completion of the CILRT and the supplemental test, the licensee was required to make corrections to the calculated Lam at the 95% UCL due to changes in volume of various water sources inside containment. The following volume changes were recorded by the licensee. The inspectors independently verified that the leakage rate in wt% per day was correct.

Source	Net Volume Change (cuft)
Reactor vessel	133.9
Suppression pool	369.5
Cont. area floor drain sump	63.3
Cont. area equipment drain sump	31.5
Drywell floor drain sump	3.5
Drywell equipment drain sump	46.6
	648.3, equivalent to 0.045 wt%/day

The licensee was also required to make corrections to account for leakage from the control rod drive (CRD) nitrogen accumulators. Thirty three accumulators experienced a decrease in pressure during the CILRT. An additional 16 psi pressure drop was added to each accumulator to account for accuracy of the pressure instrument reading (sensitivity and readability). The inspectors calculated that the increase in leakage rate penalty due to conducting the CILRT with the CRD accumulators pressurized was 0.022 wt% per day. Taking these corrections into account the containment leakage rate at the 95% UCL was 0.096 wt%/day.

b. Supplemental Test Data Evaluation

After the satisfactory completion of the CILRT a known leakage rate of 3.63 scfm, equivalent to 0.200 weight percent per day was induced. Data was collected and analyzed by the licensee every 15 minutes. The inspectors independently evaluated leak rate calculations using the data submitted by the licensee, including the post test calibration of the flowmeter, to verify the licensee's results. After 10 hours, the supplemental test was terminated with satisfactory results as indicated by the following summary (units are in weight percent per day). The results were stable within the acceptable criteria.

Measurement	Licensee	Inspectors
Measured leakage rate, Lc, during supplemental test	0.212	0.212
Induced leakage rate, Lo	0.200	0.208
Lc-(Lo + Lam)	-0.015	-0.023

Appendix J acceptance criteria: $-0.050 \leq [Lc-(Lo + Lam)] \leq 0.050$

c. CILRT Valve Lineup Penalties

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

Penetration	Local Leak Rate Test Value (Units are in SCCM)
106 RCIC Turbine Exhaust	1514.0
131 RWCU Pump Suction	12.5
204 CRD to Rx Pressure Vessel	130.1
310 Nuclear Closed Coding Water Supply	1.0
311 Nuclear Closed Cooling Water Return	10.0
317 Containment Leak Rate	10.0
319 Containment Leak Rate	4.7
404 Chilled Water Supply	10.0
405 Chilled Water Return	129.6
421 RHR Shutdown Cooling Suction	21.6
422 RCIC Steam Line	0.5
423 Main Steam Line Drain	10.0
ECCS Div. I	40.0
Total Type C Leakage Penalty or 0.004 wt%/day	1894.0

After taking these local penalties into account, the final upper 95% confidence value for containment leakage is equal to 0.100 weight percent per day which is within the acceptable value of < 0.150 weight percent per day.

d. As-Found Condition of CILRT

The as-found condition is the condition of the containment at the beginning of the outage prior to any repairs or adjustments to the containment boundary. The inspectors reviewed the licensee's summary of the containment penetration local leak rate tests (Type B and C) performed prior to the CILRT in order to determine the amount of leakage rate improvement due to repairs and adjustments. Based on the results reviewed, the inspectors determined that the amount of leakage improvement prior to the CILRT equaled 2656.2 sccm, or the equivalent of 0.005 wt%/day. However, because the leak off flange on valve E12-F055A leaked in excess of 0.090 wt%/day during the first Type A attempt. and no tests were performed on that flange prior to its disassembly during this outage or following its reassembly after completion of Work Orders No. 16.86-1673 and 87-6286, the as-found condition of the containment is considered to have exceeded the allowable limit of < 0.150 wt%/.day. The containment is considered to have failed its first as-found periodic CILRT.

No violations or deviations were identified.

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

a. Procedure

The inspectors reviewed Administrative Procedures OM1A:PAP-1120, Revision 1, "Type A, B, and C Leak Rate Test and Accountability Program," and PAP-1105, Revision 5, TCN 4, dated April 21, 1989,

"Surveillance Test Control"; and Instrument Maintenance Instruction OM8E: IMI-E2-20, Revision 1, "Volumetrics Leak Rate Monitor Operating Instruction," relative to the requirements of 10 CFR Part 50, Appendix J, and the Technical Specifications. The inspectors' comments were satisfactorily resolved except as noted in the next paragraph.

b. Type B and C Test Pressure

The inspectors reviewed the licensee's procedures and test practices and the Volumetric leak rate monitor used to pressurize the penetration and measure its leakage rate. The inspectors also witnessed portions of the Type B test conducted on the containment Equipment Hatch on July 2, 1989. The penetration test pressure was monitored at the leak rate monitor (LRM). According to the licensee the LRM is used near the penetration with short hose runs; however, if considerable distance to the penetration or high leakage rates are experienced large diameter black hose is used to minimize the line pressure drop. The licensee appeared to be aware of the NRC's concerns to ensure test pressure (Pa) is maintained at the penetration. The test in progress witnessed by the inspector on July 2 was being conducted with the LRM near the penetration test connection; however, a 50 ft length of 1/4" ID hose was being used to connect the LRM to the penetration.

Since the leakage rate during this test was low (64 sccm) the 50 ft of 1/4" hose had no effect on the test pressure. Procedure OM8E, IMI-E2-20, Revision 1, had no controls to ensure the penetration would be tested at Pa regardless of hose length and leakage rate. Based on the inspectors observation of the containment Equipment Hatch test on July 2, and the high leakage rates experienced at several penetrations in the past, the lack of controls and/or guidance on IMI-E2-20, Revision 1, to maintain the test pressure at the penetration or valve under test at Pa throughout the test is considered to be an Open Item (No. 440/89012-05(DRS)) until the procedure is revised to include such controls.

7. Drywell Bypass Test

a. Test Procedure

The inspectors reviewed surveillance Procedure OM7A:SVI-T23-T0400, Revision 2, "Drywell Leak Rate Test," against the requirements of the UFSAR and the Technical Specifications. All inspectors' comments were satisfactorily resolved.

b. Test Witnessing and Review of Test Results

The inspectors witnessed portions of the drywell bypass test conducted on July 2-3, 1989. The instrumentation used for the test had been properly calibrated. The measured bypass leakage rate was 123.3 scfm at a drywell to suppression pool differential pressure of 2.5 psi. The licensee calculated maximum allowable

leakage rate (corresponding to the 10% of a drywell A divided by $\sqrt{K}$ equals 1.68 ft^2; or 0.168 ft^2) as 5786 scfm. Therefore, the measured bypass leakage rate was approximately 2% of the allowable.

No violations or deviations were identified.

8. Review of Perry Unit 1 Reactor Containment Building Integrated Leak Rate Test Report

The inspector reviewed the licensee's "Reactor Containment Building Integrated Leak Rate Test" report submitted to the NRC on October 12, 1989, as ammended by letter dated October 27, 1989, and determined that it accurately reported the leakage rates and events regarding the Unit 1 Type A, B, and C tests performed during the first refueling outage.

No violations or deviations were identified.

9. Open Items

Open items are matters which have been discussed with the licensee which will be reviewed further by the inspector, and which involve some action on the part of the NRC or the licensee or both. Open items disclosed during this inspection are discussed in Paragraphs 2, 4.c. and 6.b. of this report.

10. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) throughout the inspection. A preliminary exit was conducted on July 7, 1989, prior to leaving the site. The final exit interview, following the review of all the data submitted by the licensee, was conducted by telephone on October 23, 1989. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged these findings. The inspectors also discussed the likely informational content of the inspection report with regards to documents or processes reviewed by the inspectors during the inspection. The licensee did not identify any such documents or processes as proprietary.