UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

MAR 24 1992

Parameter, Inc.
ATTN: Richard A. Lofy
13380 Watertown Plank Road
Elm Grove, Wisconsin 53122

Dear Mr. Lofy:

Subject: Task Order No. 35 Under Contract No. NRC-03-89-027 Entitled "Shutdown Risk and Outage Management Inspection - Indian Point 3" (FIN L-1343)

You are hereby authorized to commence work on the subject task order effective March 24, 1992 with an established ceiling of $22,942.91.

In accordance with Section G.6, Task Order Procedures, of the subject contract, this letter definitizes Task Order No. 35. This effort shall be performed in accordance with the enclosed Statement of Work and Parameter Inc.'s technical proposal dated March 16, 1992, incorporated herein by reference.

The period of performance for Task Order No. 35 is March 24, 1992 through June 10, 1992. The total cost ceiling is $22,942.91. The amount of $22,400.50 represents the total reimbursable costs, the amount of $22.72 represents the facilities capital cost of money, and the amount of $519.69 represents the fixed fee.

Accounting data for Task Order No. 35 is as follows:

B&R No.:	220-19-11-03-0
FIN No.:	L-1343-2
Appropriation No.:	31X0200.220
Obligated Amount:	$22,942.91

The following individual is considered by the Government to be essential to the successful performance of the work hereunder:

D. Waters

The contractor agrees that such personnel shall not be removed from the effort under this task order without compliance with Contract Clause H.1 - Key Personnel.

The issuance of this task order does not amend any terms or conditions of the subject contract.

Your contacts during the course of this task order are:

Technical Matters: Brian E. Thomas, Project Officer
(301) 504-1210

Contractual Matters: Brenda J. DuBose, Contract Administrator
(301) 492-7442

Please indicate your acceptance of this task order by having an official, authorized to bind your organization, execute three copies of this document in the space provided and return two copies to the Contract Administrator. You should retain the third copy for your records.

Sincerely,

Mary Lynn Scott

Mary Lynn Scott, Contracting Officer
Contract Administration Branch No. 1
Division of Contracts and
Property Management
Office of Administration

Enclosure:
As stated

ACCEPTED: Task Order No. 35

NAME Richard C. Lofy

TITLE PRES

DATE 3/30/92

Contract NRC-03-89-027
Parameter, Inc.

ENCLOSURE

STATEMENT OF WORK
Task Order 35

TITLE: Shutdown Risk and Outage Management Inspection - Indian Point 3

DOCKET NUMBER: 50-286 INSPECTION REPORT: 50-286/92-201

FIN: L-1343 NRR Priority No. 1 B&R NUMBER: 220-19-14-03

NRC PROJECT MANAGER: Brian E. Thomas, NRR (301) 504-1210

NRC TEAM LEADER: J. D. Wilcox, NRR (301) 504-2965

PERIOD OF PERFORMANCE: March 24, 1992 through June 10, 1992

BACKGROUND

The Nuclear Regulatory Commission is conducting pilot inspections in the area of shutdown risk and outage management as a part of the overall evaluation and resolution of technical issues associated with shutdown and low power operations. This is the second in a series of inspections to be conducted.

OBJECTIVE

The objective of this task order is to obtain expert technical assistance (one commercial nuclear power plant operations and maintenance specialist) to assist the NRC inspection team in the performance of the shutdown risk and outage management inspection. The specialist shall be thoroughly familiar with the control and conduct of operations of maintenance at commercial nuclear power plants, the planning and scheduling of plant outage activities and standard U.S. nuclear industry operating practices and regulatory requirements.

WORK REQUIREMENTS AND SCHEDULE

The work specified in this Statement of Work (SOW) falls within Section C.1.3 of the basic contract's SOW. The contractor shall provide one commercial nuclear power plant operations and maintenance specialist to assist the NRC in conducting the subject inspection. The contractor shall provide the qualified specialist and the necessary facilities, materials, and services to assist the NRC staff to prepare for, conduct, and document the subject inspection as specified below:

	Task	Schedule Completion
1.	Prepare for the subject inspection by reviewing inspection related background documentation and records and prepare input to the inspection plan.	One day prior to the inspection.
2.	Travel to the plant site and provide technical assistance to the NRC inspection team. The inspection will be performed in accordance with the Inspection Plan and the draft temporary instruction for the conduct of shutdown risk and outage management inspections. During the inspection the specialists shall provide technical assistance necessary for the accomplishment of the inspection requirements identified in Sections 5.02.a.3, 5.02.b.4, and other sections as assigned by the Team Leader of the attached draft temporary instruction. Backshift coverage may be necessary. The specialist shall be familiar with U.S. nuclear power plant operating practices, NRC inspection techniques, and regulatory requirements.	The on-site inspection is scheduled to take place on or about the weeks of March 29 through April 3, 1992 and May 14 through 22, 1992
3.	Conduct home-office inspection activities.	The home-office inspection is scheduled to take place for one intervening week between the first and second weeks of on-site inspection.
4.	Prepare inspection report	Documentation of the inspection activities, findings and results is to take place at the contractor's office on or about May 25 through 29, 1992.

REPORTING REQUIREMENTS

Technical reports

At the completion of Task 1, provide inspection plan input to the NRC Team Leader as specified in Section f.3.1(a) of the basic contract. The format and scope to this input shall be as directed by the NRC Team Leader.

During Task 2, the contractor's specialist shall provide daily reports to the NRC Team Leader. The format and scope of these reports shall be as provided by the NRC Team Leader as specified in Section F.3.1(b) of the basic contract.

At the completion of Task 4, the contractor shall deliver the specialist's final inspection report input (feeder report) to the NRC project Manager (original and one copy) with one hard copy and one computer diskette version (IBM WordPerfect) the NRC Team Leader. This final inspection report input will be as specified in Sections F.3.1(c) and F.3.1(d) of the basic contract. The specialist's feeder report will serve as documentation of the specialist's inspection report. As a minimum, the specialist's report input shall include the following:

For each area inspected, a description of the activities and general findings and conclusions reached regarding the adequacy of the areas.

For each area with a concern or finding, a discussion of the concern or finding with technical bases.

A first draft of the report will be provided to the NRC Team Leader on or before May 29, 1992.

NOTE: The contractor is not required to undertake any further efforts toward report finalization. For example, management review of the feeder report beyond its submittal to the Team Leader and project manager is not needed.

Business Letter Reports

The contractor will provide monthly progress reports in accordance with Section F.3.2 of the basic contract.

MEETINGS AND TRAVEL

One, one person, six day trip (on or about March 29 through April 3, 1992) to the Indian Point Unit 3 site (located near Buchanan, NY) to assist the NRC inspection team in conducting the subject inspection.

One, one person, nine day trip (on or about May 14 through 22, 1992) to the Indian Point Unit 3 site (located near Buchanan, NY) to assist the NRC inspection team in conducting the subject inspection.

The contractor's specialist shall coordinate all travel arrangements with the NRC Team Leader.

ESTIMATED LEVEL OF EFFORT

Number	Discipline	Effort
	Project Manager	20 hours
1	Operation/Maintenance Inspector	221 hours
	Support Staff	10 hours

The estimated level of effort for the specialist consists of 16 hours of home office and field inspection preparation, 125 hours of on-site inspection activities (50 hours, 1st inspection phase; 75 hours, 2nd inspection phase), 40 hours for inspection activities to be conducted at the contractor's home office during the intervening weeks between on-site inspections, and 40 hours of inspection documentation at the contractor's home office.

It shall be the responsibility of the contractor to assign technical staff, employees, and subcontractors who have the required educational background, experience, or combination thereof, to meet both the technical and regulatory objectives of the work specified in the SOW. The NRC will rely on representation made by the contractor concerning the qualifications of the personnel proposed for assignment to this task order including assurance that all information contained in the technical and cost proposals, including resumes and conflict of interest disclosures, is accurate and truthful.

APPLICABLE SPECIAL PROVISIONS

The work specified in the SOW is licensee 100% fee recoverable. The contractor shall provide fee recovery information in the monthly progress reports in accordance with the requirements of the basic contract.

The contractor's specialist assigned to this task order will have to be badged for unescorted access privilege at the plant site. The contractor shall provide all documentation required for badging (as identified by the NRC Team Leader) at the plant site.

Questions concerning badging and the plant site access shall be addressed to the NRC Team Leader.

NRC FURNISHED MATERIALS

Documents required to prepare for the subject inspection will be provided by the NRC Team Leader.

DRAFT

Attachment 1

RSIB

DRAFT TEMPORARY INSTRUCTION 2515/XXX

SHUTDOWN RISK AND OUTAGE MANAGEMENT INSPECTION

2515/XXX-01 PURPOSE

This Temporary Instruction (TI) provides guidance for performing a qualitative assessment of a plant's vulnerability to the initiation and progression of accident sequences during shutdown conditions.

2515/XXX-02 OBJECTIVES

The primary objective of this inspection is to assess the quality of a licensee's outage planning and conduct with respect to minimizing the risk of initiation of accident sequences during shutdown conditions. A secondary objective is to assess the ability of a licensee to cope with events during shutdown conditions which may arise due to inadequate planning or control of plant evolutions or work activities.

2515/XXX-03 BACKGROUND

The NRC staff has been conducting a broad evaluation of safety risks that are unique to nuclear power plant operation in the shutdown and low power conditions. Two general conclusions have been reached with regard to risk during shutdown and low power operation. They are:

(1) Non-routine activities and the availability of less equipment during shutdown increases the probability of complex events which challenge operators in unfamiliar ways; and,

(2) The lack of rigorous consideration of accident sequences during shutdown operations has resulted in potentially unavailable or inadequate instrumentation, emergency procedures, and unavailable mitigative equipment.

The continued occurrence of events during shutdown conditions which impact upon the ability to remove decay heat indicate the importance of carefully planning and coordinating anticipated outages of equipment, tests of systems and components, and plant evolutions.

2515/XXX-04 INSPECTION REQUIREMENTS

The activities outlined in Sections 04.01 and 04.02 are to be accomplished during this inspection. Emphasis is to be placed on assessing the licensee's effectiveness in planning and safely controlling plant activities during shutdown conditions. Direct observations of licensee activities should be emphasized. The inspection should be directed at safe performance and not simply compliance with the limited regulatory requirements associated with the control of plant configuration during shutdown conditions. The inspection should focus on a licensee's processes for assuring reliable decay heat removal, reliable on-site and off-site power sources, control of reactor coolant inventory and maintenance of containment capability.

Inspection guidance is provided in Sections 05.01 and 05.02 which includes a broad list of possible administrative and technical inspection attributes for assessing the quality of the planning and conduct of an outage. It is not the intent of this TI to verify all elements of programs relating to these attributes.

04.01 Pre-Outage Inspection. The following general activities should be accomplished prior to the beginning of a planned outage:

a. Assess the degree of management involvement and oversight of the outage planning.

b. Assess the methodology for control of activities focusing on the relationships among significant work activities and the availability of electrical power supplies, decay heat removal systems, reactor coolant inventory control systems, and containment integrity. Determine how this methodology is reflected in the schedule for the particular outage inspected.

c. Assess operator response procedures, contingency plans, and training for mitigation of events involving a loss of decay heat removal capability, loss of reactor coolant inventory, and loss of electrical power sources during shutdown conditions.

04.02 In-Progress Outage Inspection. The following general activities should be accomplished during an outage:

a. Assess the controls, procedures and training related to the performance of plant evolutions that affect availability of electrical power supplies, decay heat removal systems, reactor coolant inventory control systems, and containment integrity during shutdown conditions.

b. Assess the interfaces and communication channels between operations, maintenance, and other plant support personnel, particularly as they are implemented during significant plant evolutions and restoration of systems and components to operable status following maintenance, modifications, surveillance or testing.

c. Assess outage control activities including the scheduling and supervision of work activities and control of changes to the outage schedule by examining the conduct of these activities.

d. Assess the degree of management involvement and oversight of ongoing outage activities.

04.03 References.

a. Generic Letter 88-17, "Loss of Decay Heat Removal."

b. NUREG-1410, "Loss of Vital AC Power and the Residual Heat Removal System During Mid-Loop Operation at Vogtle Unit 1 on March 20, 1990."

c. Information Notice 90-65, "Recent Operating Experience on Loss of Reactor Coolant Inventory While in a Shutdown Condition."

d. Information Notice 91-22, "Four Outage Events Involving Loss of AC Power or Coolant Spills."

e. SECY-91-283, "Evaluation of Shutdown and Low Power Risk Issues," dated September 9, 1991.

f. "Onsite Review of Nuclear Power Plant Low-Power/Shutdown (LPS) Planning and Operation - A Preliminary Report," dated September 18, 1991, Gary M. Holahan, Deputy Director, Division of Systems Technology, Office of Nuclear Reactor Regulation.

2515/XXX-05 INSPECTION GUIDANCE

05.01 General Guidance. This inspection should generally be conducted in two phases, a pre-outage inspection and an in-progress outage inspection. The pre-outage inspection may be performed as few as 30-days or as many as 120 days before the commencement of a planned outage. The in-progress outage inspection may be performed at any time during the outage. An effort should be made to conduct the in-progress outage inspection when significant plant evolutions are expected to occur.

The team should generally consist of five members including the team leader. The team should possess expertise in the areas of operations, maintenance planning and scheduling, human factors assessment, training, and probabilistic risk assessment techniques. It is expected that one of the facility resident inspectors will be a team member and provide the team with observations regarding the effectiveness of the licensee's control of specific evolutions during the outage. Likewise, it is expected that one or more team members may supplement the resident staff at specific times during the outage.

05.02 Specific Guidance. The following specific guidance provides a list of activities or attributes that may be inspected in order to accomplish the requirements of each phase of the inspection.

a. Pre-Outage Inspection. This phase of the inspection should focus on the licensee's outage planning and preparation. Review of contingency plans, procedures, and training should also be performed during this phase of the inspection.

1. Evaluate management involvement and oversight of outage planning activities by observing work planning and scheduling activities such as plan-of-the-day meetings or outage planning meetings. Senior management policy and approach are important elements to the conduct of an outage and should be assessed. Outage management guidelines should exist which articulate the need to maintain critical safety functions, recognize site specific vulnerabilities, and specify safety responsibilities and assignments. Determine whether the guidelines require licensee managers to determine and specify outage activities which should be precluded from occuring simultaneously. Ambiguity in senior management policy and actions regarding outage safety can point to weakness in outage planning and controls. Interview personnel at all levels of the plant staff to evaluate if workers understand management directives, policies, and goals.

2. Review the licensee's process for planning and scheduling activities during an outage. The team should focus on the analysis of the safety aspects of the schedule. Determine if plans and schedules are detailed enough to determine when periods

of reduced reactor coolant system (RCS) inventory will occur; when on-site and off-site electrical power sources will be unavailable; when the containment will be open; and when significant testing or other plant evolutions will occur which would render redundant pieces of equipment unavailable. Determine if an effort has been made to reduce the number and duration of times these situations may exist. Licensees may use a variety of planning and scheduling techniques from very sophisticated computer-generated schedules to simple manually derived timelines. Either of these approaches may be acceptable. However, it may not be readily apparent from the schedule developed by the licensee when certain critical system configurations or evolutions will occur. In this case, based on information gathered from the licensee, the team should consider independently developing a timeline of planned activities for the outage focusing on periods when reduced RCS inventory will occur, when electrical power sources will be out of service, and when the containment may be open. Review licensee plans for compensatory measures to be put into effect when these plant conditions exist.

3. Review the licensee process for developing individual work packages. Determine the manner in which work packages are assembled and reviewed. Determine what processes exist that assure adequate coordination between different work activities. Review a number of packages to determine their completeness and thoroughness in defining job requirements and coordinating such activities as equipment tag-outs, confined space permits, fire watches, etc. Determine to what extent packages have been assembled, reviewed and are ready to be worked prior to the start of the outage. Determine also how forced outage planning differs from refueling outage planning. Determine if individual safety reviews of work packages are performed prior to the occurrence of either a planned outage or a forced outage.

4. Review plant procedures and training to determine the degree to which conditions unique to shutdown operations have been addressed. Determine if normal operating procedures contain appropriate cautions or warnings when actions prescribed by the procedure may cause perturbations in either RCS inventory or the availability of on-site or off-site electrical power sources. Determine if there is a process to evaluate shutdown events for applicability to the plant and whether the review identifies appropriate lessons learned. Determine and evaluate how the licensee trains on these events. It is generally acknowledged that current plant simulators do not simulate shutdown conditions in great detail. The team may be able to develop, with the aid of the licensee, a very limited number of simulator scenarios which may demonstrate the loss of decay heat capability as a result of either the loss of on-site or off-site electrical power sources or RCS inventory. These scenarios may be used to do a limited validation of existing procedures or demonstrate weaknesses that may exist in either procedures or training.

5. Many of the guidelines for responding to events during shutdown conditions may be contained in a number of different procedures. These procedures may include responses to loss of on-site or off-

site electrical power, loss of RCS inventory, loss of decay heat removal, loss of instrument air, or loss of service or component cooling water. However, it should not be necessary to identify the actual event or cause of the event to achieve effective mitigation. The team should perform operator walkthroughs with as many of these procedures as possible. Specifically, written instructions and training should reasonably assure that emergency procedures or the equivalent apply to reduced inventory operation. The ability to close containment and the procedures for establishing containment integrity should be verified. When performing walkthroughs or simulations the following should be determined:

(a) the procedures can be physically implemented considering equipment accessibility or other human factors such as poor lighting or poor equipment labeling;

(b) the procedures can be implemented within the time frames allotted considering the actual course of accident events;

(c) environmental conditions (temperature, steam, flooding, etc.) that would exist during the event should not prevent accomplishment of mitigative actions;

(d) the procedures can be effectively used by plant personnel in the control room and other parts of the plant as necessary;

(e) training with use of the procedures is adequate; and

(f) a program exists to update and improve the procedures.

b. In-Progress Outage Inspection. The second phase of the inspection should focus on the day-to-day conduct of the outage. In particular, special attention should be placed on evaluating the control of changes to the outage schedule, control of work activities, control of system alignments, and communications between the operations staff and support personnel.

1. Observe the conduct of operations personnel both inside and outside the control room during shutdown conditions. The inspection in the area of conduct of operations does not necessitate periods of continuous control room observation but should seek to make observations during periods of high activity inside the control room. The team should seek to observe evolutions such as system filling or draining, realignment of electrical power sources, or other evolutions that may affect decay heat removal capability. Observation of activities during backshift hours is also suggested. Based on these observations, determine the quality of operator professionalism, attentiveness, awareness of plant status, communications, control of plant evolutions, response to alarms and other abnormal indications, adequacy of training, and overall planning and control of plant and shift activities. Determine the operator's ability to monitor key plant parameters in order to diagnose abnormal conditions or to classify an emergency during an accident. Assess the effectiveness of shift turnovers by observing as many

different turnovers as possible. Determine if adequate time is allotted for the conduct of the turnovers and if control room documentation (e.g., shift logs and night orders) is useful and available.

2. While observing routine activities inside the control room, evaluate access control and traffic in the control room. Determine whether collateral duties of operators (e.g., filling out tag-outs and interfacing with maintenance and surveillance test personnel) have an adverse effect on the operator's ability to monitor plant status. Determine the effectiveness with which operation personnel appropriately control support activities in progress, including maintenance, troubleshooting, and testing activities which can potentially influence plant system operations. Verify that maintenance and modification activities are coordinated with the control room personnel and that appropriate briefings and turnovers are held with control room operators. Determine the extent to which licensed operators recognize the supervisory responsibilities associated with their license and assess their effectiveness in directing the activities of nonlicensed operators, technicians, and craftspersons. Determine the qualification and license status of on-shift operators. Ensure that the requirements controlling overtime and minimum shift staffing are satisfied.

3. Accompany an auxiliary operator during routine rounds, or otherwise tour the plant. Observe the auxiliary operator's attentiveness to out of the ordinary plant situations. Assess the adequacy of housekeeping, avoidance of fire hazards, radiological controls, lighting, equipment labeling, and vital area access controls. Inspect portions of selected safety systems and evaluate the licensee configuration control practices. Confirm that valve and breaker positions conform to procedure requirements and that positions required by procedure are consistent with those on controlled plant drawings and system lineup procedures. Select several safety system tag-outs for inspection. Verify that operators thoroughly perform equipment tagging and isolation. Verify that tags are properly hung and that equipment has been placed in the designated position. Determine if equipment status changes are appropriately documented. Determine if the licensee has adequate controls to ensure the independent verification of system alignment and the performance of functional testing when returning equipment to service. It is recommended that an inspector accompany an auxiliary operator as a system alignment is performed to provide insight into the licensee system alignment practices. Most licensees normally allow only operations personnel to change the position of valves, breakers, or switches. If other non-operations personnel are allowed to operate equipment, it is important that the team assess the degree and manner in which control room personnel remain cognizant of changes in equipment status.

4. Verify that maintenance and modification work is performed in accordance with current written and approved instructions. Verify that the instructions are detailed enough to guide the performance the intended maintenance. The inspection in the area

of control of work activities should focus on assessing the coordination of activities rather than assessing the effectiveness of any particular maintenance or testing. Verify that equipment isolation and tagging is appropriate and conforms to procedural requirements. Determine if appropriate control of post-maintenance testing following the conduct of maintenance activities exists by verifying required administrative approvals were obtained before testing was started. Special attention should be given to those activities which reduce the number of available electrical power sources, affect redundant decay heat removal equipment, or could change the RCS inventory. Lack of adequate controls over activities in the plant switchyard have resulted in losses of offsite power sources. Activities related to work on service water systems have indirectly affected decay heat removal capability. Local leak rate testing of containment penetrations have affected both containment integrity and have caused perturbations in RCS inventory when isolation valves were opened and allowed an RCS interfacing system to be drained. The existence of fire hazards and the impairment of fire protection or mitigation systems should be assessed. Licensee control and management of contractor specific work should also be assessed as an element of the control of work activities.

5. Determine how changes to the outage schedule are controlled during the outage. Determine who has the authority to make changes and by what means those changes are implemented. Determine how changes are communicated to plant personnel, in particular to the operating shift crews. Determine if the safety impact of changes to the schedule are assessed on a real-time basis.

2515/XXX-06 REPORTING REQUIREMENTS

The inspection findings and conclusions shall be documented in an inspection report. A copy of the inspection report shall be forwarded, in addition to the normal distribution, to the Directors, Division of Reactor Inspection and Safeguards, and Division of Systems Technology, Office of Nuclear Reactor Regulation.

2515/XXX-07 COMPLETION SCHEDULE

This team inspection will commence in October 1992. The actual completion date for all sites will be dependent upon the outage schedules of the various licensees.

2515/XXX-08 EXPIRATION

This TI shall remain in effect for two years from the date of issuance.

2515/XXX-09 CONTACT

Any questions regarding this temporary instruction should be addressed to R. A. Gramm (FTS) 964-2957 or J. R. Ball (FTS) 964-2975. Requests for contractor support to implement this TI should be made directly to DRIS via memorandum.

2515/XXX-10 STATISTICAL DATA REPORTING

For RITS input, the actual inspection effort should be recorded against 2515/XXX. At the discretion of the team leader and regional management, credit may be taken for completion of appropriate MC 2515 inspection modules on the basis of the efforts expended on this TI.

2515/XXX-11 ORIGINATING ORGANIZATION INFORMATION

11.01 Organizational Responsibility. The Special Inspection Branch (RSIB) of the Division of Reactor Inspection and Safeguards (DRIS), NRR will provide support and overall guidance for these inspections. Specific technical questions may be addressed through RSIB to either to the Reactor Systems Branch (SRXB) or the Electrical Systems Branch (SELB) of the Division of Systems Technology (DST).

11.02 Estimated Resources. Each inspection is planned for about five weeks for five persons (25 staff weeks) with one week of preparation (5 staff weeks), two weeks (10 staff weeks) of actual inspection effort, one intermediate week (excluding the assigned resident inspector) in-office review (4 staff weeks), one intermediate week for the assigned resident inspector and the team leader to follow significant plant evolutions while the team is offsite (2 staff weeks), and one week (5 staff weeks) for report writing. Some additional time (approximately 3 weeks) will be required by the team leader to issue the final report and one week of miscellaneous inspection support for staff briefings, participation in pre-exit and exit meetings and for providing assistance to the team leader (1 staff week) is anticipated. Thus, the total resources required for activities directly related to the performance of this inspection is approximately 30 staff weeks per site.

11.03 Inspection Implementation Latitude. The expectation is that this TI will be performed at essentially every site and that the inspection requirements identified in Sections 04.01 and 04.02 will be accomplished. A regional evaluation that has been approved at the regional division director level and that has concurrence by the Director, Division of Reactor Inspections and Safeguards, may conclude that the inspection scope requirements can be reduced or that the inspection can be waived for unique situations.

11.04 Parallel Inspection Procedures. The inspection procedures that this TI may satisfy totally or in part are listed below. Where credit is taken, the inspection report should note the inspection procedure number per MC-610. The region should make final determination based on the scope and documentation of the inspection.

42700	61726	71710	TI 2515/92
60705	62703	93802	TI 2515/101
60710	71707	93804	TI 2515/103

END