

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-282/91023(DRS); 50-306/91023(DRS)

Docket Nos.: 50-282; 50-306 Licenses No. DPR-42, No. DPR-60

Licensee: Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

Facility Name: Prairie Island Nuclear Generating Station
Units 1 and 2

Inspection At: Welch, MN 55089

Inspection Conducted: November 4-8 and 18-22, 1991

Inspectors: J. F. Smith 12-12-91
J. F. Smith Date

G. Replogle 12-12-91
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Others contributing to this inspection:

A. Trusty, INEL, NRC Consultant

Approved By: J. M. Jacobson 12-12-91
J. M. Jacobson, Chief Date
Materials and Processes Section

Inspection Summary
Inspection on November 4-8 and 18-22, 1991 (Report Nos. 50-282/91023(DRS) and 50-306/91023(DRS))
Areas Inspected: Routine, announced safety inspection for the licensee's initial response to Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve (MOV) Testing and Surveillance", (2515/109).

Results:

The licensee demonstrated weaknesses in the following areas:

- The licensee's documents were generally lacking in technical detail and relied heavily on the competence of the staff.

The licensee demonstrated strengths in the following areas:

- The licensee had already initiated action to improve the content of technical documents to reduce reliance on competence of the staff.
- The licensee was highly responsive to all suggestions concerning improvement of the GL-89-10 program.
- The licensee's staff was exceptionally knowledgeable in the area of MOVs.

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DETAILS

1. Persons Contacted

Northern States Power Company (NSP)

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- *# K. Albrecht, General Support Engineer
- # G. Eckholt, Plant Licensing Engineer
- *# B. Brasier, Superintendent, Systems Engineering,
Mechanical
- # G. Gore, Project Engineer
- * A. Hunstad, Staff Engineer
- * B. Johnson, System Electrical Engineer
- # G. Lenertz, Superintendent, Maintenance
- *# J. R. Maki, Superintendent, Electrical Engineering
- *# G. Miller, Superintendent, Technical Services
- # A. L. Myrabo, Maintenance Engineer
- # M. Reddemann, General Superintendent, Electrical &
Instrument Systems
- # J. Ruether, Lead Production Engineer
- # M. Wilding, Technical Support Manager
- # R. Wirkkala, Senior Production Engineer

U. S. Nuclear Regulatory Commission (NRC)

- *# Don Kouloff, Resident Inspector
- # A. Masciantonio, Project Manager

Idaho National Engineering Laboratory (INEL)

- * A. D. Trusty, NRC Consultant

- * Denotes those attending the entrance meeting on
November 4, 1991.
- # Denotes those attending the exit meeting on November 22,
1991.

2. Licensee Action on Previous Inspection Findings (92701)

- a. (Closed) Open Item 50-282/88011-02(DRS); 50-306/88011-02(DRS); Resubmittal of Final IEB 85-03 Report Due to Changes in As-Found Data.

Bulletin 85-03 was superseded by GL 89-10 which does not require submittal of these data. However, the NRC inspectors reviewed the data provided by the licensee to satisfy this open item and found it to be acceptable. This item is closed.

- b. (Closed) Open Item 50-282/88011-03(DRS); 50-306/88011-03(DRS): Development of Acceptance Criteria for Power and Current Traces for MOVs.

The NRC inspectors reviewed the licensee's acceptance criteria for MOV power and current traces and found them to be derived from a recognized industry source and compatible with the requirements of the application. This item is closed.

3. Inspection of the Program Developed in Response to Generic Letter 89-10 (2515/109).

- a. Background

On June 28, 1989, the NRC issued Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve (MOV) Testing and Surveillance", which requested addressees to establish a program to ensure that switch settings for safety-related MOVs and certain other MOVs in safety-related systems are selected, set and maintained properly.

The NRC inspectors followed Temporary Instruction (TI) 2515/109 (January 14, 1991), "Inspection Requirements for Generic Letter 89-10, Safety-Related Motor-Operated Valve Testing and Surveillance," in performing this inspection. The inspection focused on Part 1 of the TI which involves a review of the program being established by the licensee in response to GL 89-10. The licensee had not progressed sufficiently to perform part 2 of the TI which involves a review of program implementation.

- b. Generic Letter 89-10 Program Review

The NRC inspectors reviewed the licensee commitments to the GL. The licensee submitted their response to the GL to the NRC by letter dated December 28, 1989, and committed to meet the intent of GL 89-10.

The NRC inspectors reviewed available documentation to assess the licensee's program addressing GL 89-10 and discussed the program in detail with licensee personnel. Revision 2 of H5, "Motor Operated Valve Program" was being implemented at the time of this inspection. The program appeared to meet the intent of GL 89-10; however, the inspectors noted that the licensee's plan was generally lacking in technical detail and in justification of assumptions.

The licensee was refining its valve testing schedule during the inspection and anticipated completion of all tests within the 5 year period specified by GL 89-10.

(1) Scope of the GL Program

The NRC staff position is that the scope of GL 89-10 includes all safety related MOVs and other MOVs that are position-changeable in safety-related piping systems. In Supplement 1 to the GL, the staff defined "position-changeable" as any MOV in a safety-related piping system that is not blocked from inadvertent operation from the control room.

The NRC inspectors reviewed the scope of the licensee's program as described in its "Motor Operated Valve Program." There are 224 safety-related MOVs at Prairie Island, of which, 206 MOVs are included in the GL 89-10 program. The licensee removed 18 valves from its program within the guidance of the GL. The licensee indicated that these valves would be added to the program description during the next revision to ensure that all safety related valves are accounted for.

The NRC inspectors noted that the licensee had not considered nonsafety-related valves for inclusion in its GL 89-10 program. The licensee acknowledged that there may be nonsafety-related valves in the emergency operating procedures which may require manipulation during design-basis events. The licensee indicated that they would evaluate these valves for inclusion into their GL 89-10 program.

The inspectors reviewed system drawings of the Reactor Coolant System, Chemical and Volume Control System and Safety Injection System to sample for completeness of the MOV list. Based on the review and the discussions, the inspectors determined that the scope of the licensee's program, with the exception of nonsafety-related valves that may affect safety-related systems during design basis events, is consistent with the guidance of GL 89-10.

(2) Design Basis Reviews

The NRC inspectors discussed design basis reviews with licensee personnel. The results of the different areas reviewed by the NRC inspectors are discussed below.

(a) Differential Pressure Requirements

The NRC inspectors reviewed M-H5, "Motor Operated Valve Sizing/Setting Calculations," and discussed differential pressure (dp) requirements with licensee personnel. The licensee indicated that dp values were based on plant operational experience and that the Final Safety Analysis Report (FSAR), Emergency Operating Procedures (EOPs), normal and abnormal procedures were only referred to occasionally. The inspectors noted that the licensee should review the FSAR, EOPs, normal and abnormal procedures for all valves included in the licensee's GL 69-10 program to ensure that the maximum dp that could be encountered by the valves was accounted for in the design basis reviews. The licensee agreed to perform a thorough review of these documents to ensure that the most conservative dp for each valve was used.

(b) Reduced Voltage Capability

The NRC inspectors reviewed several MOV sizing calculations and noted that several MOV motors appeared to be undersized and could not meet the thrust requirements at degraded voltage. The licensee indicated that, in some cases, the bounding dps across the MOVs were overly conservative and that refined calculations would be performed at a later date. The licensee indicated that excess conservatism could be reduced by using realistic dps, using smaller orifice diameters based on vendor drawings, and incorporating head loss due to flow and other parameters. The inspectors cautioned the licensee that in most cases flow in piping upstream of MOVs would not exist due to the closed position of the valves and that head loss due to flow could not be considered in those instances. The inspectors informed the licensee that removing any conservatism from their current design basis assumptions would need to be justified and documented.

The licensee indicated that two new safeguards diesel generators would be operational at Prairie Island by November, 1992. This modification would increase the voltage to the MOVs during design basis

conditions. The licensee is currently updating its degraded voltage calculations to incorporate the affects of the new safeguards diesel generators.

The licensee indicated that the resistance values used for electrical cables in the degraded voltage calculations were based on a maximum temperature of 90 degrees C. The NRC inspectors noted that some electrical cables within the containment may be exposed to higher ambient temperatures during design basis conditions (loss of coolant accident, LOCA). The licensee agreed to reevaluate its degraded voltage calculations to ensure that the elevated containment temperatures experienced during a LOCA would not inhibit valve operation.

The NRC inspectors noted that the licensee did not consider the affects of high ambient temperatures on the performance of MOV motors. The licensee indicated that Limitorque is currently performing testing and analysis to address this issue. The licensee committed to incorporate the affects of high ambient temperatures on MOV motors when testing data is made available.

(c) Completed Design Basis Reviews

The NRC inspectors reviewed several design basis review packages and discussed the performance of the design basis reviews with licensee personnel. The licensee indicated that 159 of the design basis reviews were completed at the time of the inspection. The inspectors noted that the licensee included the maximum dp expected for each valve in the design basis reviews but did not include system flow or other factors that could have an affect on valve performance. The licensee agreed to document the design basis conditions and to include expected flow conditions, and maximum expected dp and the bases for each.

(3) MOV Switch Settings

The NRC inspectors discussed the process for sizing MOVs and setting switches with the licensee. The licensee indicated that the valve

and stem factors used in calculations were those originally obtained from the component manufacturers. The NRC inspectors considered these factors to be nonconservative. The licensee used the original Limiting torque equations, which were also considered to be nonconservative, to determine a required thrust for each valve. The licensee committed to evaluate diagnostic results from full flow/dp tests to ensure that the valve and stem factors used are accurate and that the margins available at the valves are as expected. The licensee committed to reevaluate valve and stem factors as information becomes available.

The licensee used diagnostic equipment to set the torque switches. The inspectors noted that the licensee did not account for diagnostic equipment inaccuracies when establishing minimum torque switch settings. Instead, the licensee used the minimum calculated value as the minimum acceptable thrust value and established an upper limit setting of 110% of the minimum calculated value. The licensee considered the additional 10% to be adequate margin to account for diagnostic equipment inaccuracies. However, the additional 10% did not establish the lower limit of torque switch settings, as would be expected when applying a safety margin. The inspectors informed the licensee that this methodology allowed no margin to account for diagnostic equipment inaccuracies and was not considered to be acceptable. The licensee agreed to account for these inaccuracies in the minimum and maximum torque switch settings and to reevaluate all diagnostic testing that had already been performed on MOVs.

The NRC inspectors noted that inaccuracies for rate-of-loading, actuator wear, valve wear, and torque switch repeatability were not included in torque switch settings. The licensee agreed to perform engineering evaluations to consider these factors when reliable data becomes available. The inspectors informed the licensee that they would be expected to account for these factors in their calculations.

(4) Design Basis Differential Pressure and Flow Testing

The NRC inspectors reviewed the licensee's program and discussed its method of demonstrating the

capability of MOVs with plant personnel. The licensee had completed static testing on 136 valves, full flow/dp testing on 58 valves, and reduced flow/dp testing on 78 valves. Most testing had been performed in accordance with other programs such as ASME Section XI testing, or the licensee's preventive maintenance program. The licensee stated that a large portion of this testing could meet GL 89-10 testing requirements. The inspectors cautioned the licensee that full flow/dp testing greater than 5 years old may be invalid, due to periodic verification requirements. The inspectors noted, however, that testing of valves that had not previously been tested should take precedence over valves for which the 5 year testing period had expired.

The NRC inspectors discussed the performance of full flow/dp testing with licensee personnel. The licensee stated that the pressures and flows used during testing of the MOVs would be the maximum attainable. The NRC inspectors cautioned the licensee that testing at dps and flows less than design basis conditions would require extrapolation of the test results to design basis conditions.

The licensee identified 20 safety-related MOVs within its GL 89-10 program for which full flow/dp testing was not practicable. The licensee also identified 6 other MOVs that could only be tested at a substantially reduced pressure due to safety and/or equipment damage concerns. The NRC inspectors reviewed "Safety Evaluation 312" which documented justification for not full flow/dp testing these valves. The inspectors found that the reasons for excluding these MOVs from full flow/dp testing were consistent with the guidance of GL 89-10.

(5) Periodic Verification of MOV Capability

The current schedule for periodic verification of proper switch settings on MOVs is every 5 years. The licensee indicated that the methods for performing periodic verification of MOV capability had not been determined at the time of the inspection. The NRC inspectors cautioned the licensee that static testing was not an acceptable method for the periodic verification of MOV capability at this time.

c. Associated Programmatic Reviews

The NRC inspectors reviewed other licensee programs associated with MOVs.

(1) Design Control for Thermal Overload Protection

Thermal overloads (TOLs) at Prairie Island were designed to remain in the circuit at all times. The NRC inspectors reviewed the licensee's Motor Operated Valve Thermal Overload Heater Sizing procedure H6 and discussed its content with licensee personnel. The inspectors concluded that the licensee's design philosophy is compatible with the guidance of IEEE Standard 741-1990 for Thermal Overload Trip Criteria and is appropriate for use on the MOVs covered by GL 89-10.

(2) MOV Setpoint Control

The NRC inspectors reviewed the licensee's methods for controlling setpoints. At the time of the inspection, only one person at the plant had responsibility for MOV setpoints. Any work performed on MOVs had to be processed through that person. The licensee recognized the shortcomings of the system and indicated plans to include MOV setpoints in the Setpoint Control System already used for other equipment. Introduction of the MOV setpoints into the system was delayed in order to avoid the confusion of listing data from both the Motor-Operated Valve Analysis and Testing System (MOVATS) and the Valve Operation Test and Evaluation System (VOTES) into a single data base.

(3) Inservice Testing (IST)

The NRC inspectors reviewed the licensee's IST program for MOVs. The licensee's IST program was written to conform with the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition through Winter 1981 Addenda.

The NRC inspectors examined the licensee's air-operated Main Steam Isolation Valves (MSIV) to determine if they were similar to those found to perform erratically at another nuclear power plant. Although these MSIVs are of a similar design, the NRC inspectors found no indications of the problems experienced at the other facility.

(4) Maintenance

Maintenance activities are scheduled by the Mechanical Preventive Maintenance Coordinator and tracked through completion. Preventive Maintenance (PM) procedures were established in accordance with applicable vendor recommendations, equipment operating history, and industry experience. The NRC inspectors reviewed PM procedure D 70.0, "Motor Operated Valve Maintenance Procedures." The inspectors noted that full flow/dp testing was performed after maintenance and refurbishment. The licensee indicated that this testing could be used to meet the GL 89-10 testing requirements. The inspectors noted that testing in such a manner could be considered preconditioning and that testing of preconditioned MOVs would not show that the valves would operate under degraded conditions (just prior to refurbishment). The licensee indicated that performing PMs on the MOVs prior to testing permitted the establishment of a good diagnostic baseline from which future testing could monitor MOV degradation. The licensee committed to testing a significant number of MOVs (10 to 15) in their as-found conditions to show that MOV degradation over the maintenance period would not inhibit MOV operability.

The licensee's nominal PM frequency was 5 years. The NRC inspectors noted that the Limitorque recommended frequency for stem Lubrication was 18 months. For a stem lubrication frequency of 18 months, a stem factor of 0.2 is generally accepted; however, applicability of this stem factor to a 5 year lubrication frequency has not been established. The licensee indicated that the Limitorque recommended frequency was based on frequent repositioning of MOVs and that the repositioning frequency of MOVs at Prairie Island was significantly less. The inspectors also noted, during a plant walkdown, that the stem lubrication had shown significant visual degradation on some MOV stems. The Neverseize lubricant on visible portions of some stems was dry and caked. The effect of this condition on the stem coefficient of friction could not be predicted, but some change might reasonably be expected. The licensee committed to perform diagnostic testing to show that the stem factor had not degraded to a value greater than 0.2 over the 5 year PM frequency and to adopt the

manufacturer's recommended frequency if the results of the testing indicate this to be appropriate.

The NRC inspectors noted that the licensee did not periodically overhaul its MOVs. However, the inspectors also noted that the specified preventive maintenance for MOVs was extensive and included a thorough inspection of all mechanical and electrical components and replacement of all components that showed signs of degradation. Since the failure rate for MOVs at Prairie Island appears to be substantially less than that of industry, the inspectors considered this method to be acceptable.

Guidance for post-maintenance testing was specified by procedure 5AWI 3.12.4, "Post-Maintenance Testing." Specific testing was as specified by system engineers and consisted of such activities as stroke timing, motor current signatures, and diagnostic testing. The NRC inspectors considered the licensee's methods for post-maintenance testing to be adequate.

(5) Training

The NRC inspectors reviewed the training provided to personnel performing work associated with the implementation of the Prairie Island MOV program. The training program at Prairie Island for both staff and contractors appeared to be appropriate for the work to be covered and was administered over a period appropriate for the complexity of the material involved.

(6) Followup and Trending of MOV Maintenance and Problems

Trending of MOV maintenance and problems was facilitated by use of the MH-SRH computer program, which tracked the preventive and corrective maintenance history of all MOVs. Followup of maintenance and problems was performed by the MOV coordinator, using information from the computer program. There was no formal document prescribing this activity. The effectiveness of trending was entirely dependant on the performance of the MOV coordinator.

(7) Operating Experience and Vendor Notification

The NRC inspectors reviewed applicable procedures and discussed the process for handling various information notices from different sources. Plant procedure 5ACD 3.7, "Operating Experience Assessment," controls the evaluation of industry information and experience from sources such as INPO, Westinghouse, Limitorque, NRC and other vendors. The licensee has taken steps to ensure that information received is screened and evaluated by appropriate licensee organizations and that appropriate actions are planned. The NRC inspectors found the licensee's program for the processing and control of operating experience and vendor notifications to be acceptable.

(8) MOV Modifications and Design Changes

The NRC inspectors reviewed licensee procedures for performing design modifications and instituting the design change. No problems were noted in this area.

(9) Diagnostics

The licensee performed original MOV diagnostic work using the MOVATS equipment. The licensee had also purchased two VOTES diagnostic testing machines. The licensee indicated that the VOTES equipment will be used where practicable in the future. However, under certain circumstances, it may be necessary to use MOVATS. At the time of the inspection, initial VOTES training had not been completed for the licensee's personnel.

The NRC inspectors noted that recent INEL research studies have indicated that inaccuracies for various diagnostic systems may be substantially higher than originally reported by the manufacturers. The licensee indicated that inaccuracies for its diagnostic equipment are currently being revised and that new inaccuracy values would be incorporated into the diagnostic testing program when they became available.

(10) Control of Open Maintenance Items

The NRC inspectors reviewed the licensee's methods for controlling open maintenance items. The licensee indicated that priority for each work request was set before the work requests were

distributed. The work requests were distributed to the system engineers, who then tracked them on the RID 100B computer system, which identified every open work request. Additionally, each piece of equipment which was out of service was tracked in the control room logs. The computer program was available to anyone who could sign on to the computer, so dissemination of data concerning the work in progress was available to any interested personnel.

(11) Walkdown

The NRC inspectors performed a walkdown of 42 valves included in the licensee's MOV program. The walkdown was limited to visual external observations as valve maintenance was not performed on any MOV during this inspection period.

The NRC inspectors observed steam generator blowdown isolation valve (MV 32058) dripping oil. The inspectors noted that the dripping oil may be indicative of a breakdown of the MOV gear grease. The licensee should take steps to identify the cause of this potential problem and take appropriate corrective steps.

The NRC inspectors examined 6 valves not included in the licensee's GL 89-10 program. The condition of these valves was markedly inferior to the valves included in the 89-10 program. The licensee indicated that a PM frequency had not been established for valves not included in the GL 89-10 program.

Housekeeping and general plant conditions seemed adequate.

4. Licensee Self-Assessment

The licensee's self assessment program was not a separately identified document. It was included in the Internal Operating Experience Assessment Program which was initiated in 1990. This program dealt primarily with problems involving the Human Performance Enhancement System (HPES); it reviewed component failures and LERs and responded to requests for reviews from any individual in the plant. When practical, reviews were performed by the administrator or three assistants, all of whom were senior reactor operators. Any item which could not be assessed by that group was sent to an appropriate plant engineer for assessment. All items

were tracked by computer. An interesting facet of this program was that the computer was programmed to identify any late items assigned to the engineer whenever he signed onto the system. In essence, the engineer could not use the computer without being reminded that his assessment was late.

The NRC inspectors noted that the Internal Operating Assessment Program does not routinely review maintenance and repair work requests. The system engineer was expected to identify potential problems in these areas. As noted in other areas, this approach relies heavily on the competence of its system engineers. The program is also reactive, investigating areas in which problems have been observed.

5. Licensee Documents Reviewed

The following documents were reviewed by the inspectors during this inspection:

- ASMF Section XI Inservice Testing Implementing Program, H10, Revision 0, dated November 6, 1989.
- Commercial Grade Procurement, N1AWI 6.1.9, Revision 2, dated December 14, 1990.
- Maintenance Work Request (MWR) K8167-AF-Q, dated May 18, 1987.
- MWR L2661-AF-Q, dated May 24, 1987.
- MWR K8165-AF-Q, dated May 26, 1987.
- MWR P1450-RH-Q, dated March 8, 1990.
- MWR N9258-EB-Q, dated March 8, 1990.
- MWR N3609-EB-Q, dated April 29, 1989.
- MWR 3029-EB-Q, dated June 10, 1991.
- MWR R2622-CC-Q, dated May 6, 1991.
- MWR P1703-CL-Q, dated March 19, 1990.
- MWR N3254-RA-Q, dated April 25, 1989.
- MWR P1261-SI-Q, dated March 13, 1990.
- MWR P1279-SI-Q, dated March 8, 1990.
- MWR K8166-AF-Q, dated May 26, 1987.

- MWR N3583-RH-Q, dated April 27, 1989.
 - Motor Operated Valve Actuators Lesson Plan, R8314A-020.
 - Motor Operated Valve Maintenance Procedures, D70.0, Revision 11, dated October 17, 1991.
 - Motor Operated Valve Program, H5, Revision 2, dated October 17, 1991.
- Motor Operated Valve Thermal Overload Heater Sizing, H6, Revision 1, dated October 3, 1991.
- MCV Testing Using Votes, D70.1, Revision 0, dated December 15, 1989.
 - NSP Letter to NRC dated December 28, 1989, Response to NRC Generic letter 89-10, Safety-Related Motor-Operated Valve Testing and Surveillance.
 - Operating Experience Assessment, 5ACD 3.7, Revision 6, dated November 6, 1990.
 - Operating Section Watchstanders Guide, SWI-0-13, Revision 11, July 18, 1991.
 - Preventive Maintenance (PM), I1, Revision 3, dated May 23, 1991.
 - Post Maintenance Testing, 5AWI 3.12.4, Revision 1, dated August 1, 1990.
 - Safety Evaluation 312, Addendum 0, dated November 4, 1991.
 - Testing of Motor Operated Valves Using MOVATS Equipment, D70.2, Revision 2, dated August 3, 1990.

6. Conclusions

The licensee is actively pursuing the development of its program in response to GL 89-10. Some refinement of the licensee's GL 89-10 program will be necessary to assure that the results are conservative. The licensee made several commitments to resolve various NRC concerns. Future inspections will be performed to evaluate the licensee's implementation of the GL 89-10 program.

7. Exit Meeting

The inspectors met with the licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection

on November 22, 1991. The inspectors summarized the purpose and scope of the inspection and the findings. The inspectors also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspectors during the inspection. The licensee did not identify any such documents or processes as proprietary.