



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

May 7, 2020

Mr. Eric Larson  
Site Vice President  
Entergy Operations, Inc.  
Grand Gulf Nuclear Station  
P.O. Box 756  
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION – TRADITIONAL ENFORCEMENT  
FOLLOW-UP INSPECTION REPORT 05000416/2020014

Dear Mr. Larson:

On April 1, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed a traditional enforcement follow-up inspection at Grand Gulf Nuclear Station and discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

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

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 Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Jason W. Kozal, Chief  
Reactor Projects Branch C  
Division of Reactor Projects

Docket No. 05000416  
License No. NPF-29

Enclosure:  
As stated

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GRAND GULF NUCLEAR STATION – TRADITIONAL ENFORCEMENT FOLLOW-UP  
INSPECTION REPORT 05000416/2020014 – May 7, 2020

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|-----------|-----------|-----------|-----------|----------|--|--|
| OFFICE    | SRI:DRP/C | SHP:DNMS  | SPE:DRP/C | BC:DRP/C |  |  |
| NAME      | RKumana   | MSimmons  | CYoung    | JKozal   |  |  |
| SIGNATURE | /RA/      | /RA/      | /RA/      | /RA/     |  |  |
| DATE      | 4/30/2020 | 4/30/2020 | 4/30/2020 | 5/7/2020 |  |  |

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

Docket Number: 05000416

License Number: NPF-29

Report Number: 05000416/2020014

Enterprise Identifier: I-2020-014-0003

Licensee: Entergy Operations, Inc.

Facility: Grand Gulf Nuclear Station

Location: Port Gibson, MS

Inspection Dates: February 3 to March 27, 2020

Inspectors: R. Kumana, Senior Resident Inspector  
M. Simmons, Senior Health Physicist

Approved By: Jason W. Kozal, Chief  
Reactor Projects Branch C  
Division of Reactor Projects

Enclosure

## **SUMMARY**

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a traditional enforcement follow-up inspection at Grand Gulf Nuclear Station, 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**

None.

## 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 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.

## OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

### 92723 – Follow-up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period

From December 9, 2016, through August 14, 2019, the NRC issued 11 Severity Level IV traditional enforcement violations with 14 examples associated with impeding the regulatory process. These violations, which are listed below, were issued in the following NRC Inspection Reports:

- 05000416/2016007 (ADAMS Accession No. ML16348A222), dated December 9, 2016
- 05000416/2017002 (ADAMS Accession No. ML17220A152), dated August 3, 2017
- 05000416/2017007 (ADAMS Accession No. ML17339A154), dated December 1, 2017
- 05000416/2018004 (ADAMS Accession No. ML19038A437), dated February 7, 2019
- 05000416/2019002 (ADAMS Accession No. ML19226A236), dated August 14, 2019

Specifically, the violations included:

- (1) Failure to Obtain NRC Approval for Changes to the Reactor Protection System, NRC-identified NCV 05000416/2016007-02;
- (2) Failure to Obtain NRC Approval for Changes to Diesel Generator Trips and Flood Mitigation Strategy, NRC-identified NCV 05000416/2016007-03 (two examples);
- (3) Failure to Evaluate Delaying Inspection of Diesel Fuel Oil Storage Tank, NRC-identified NCV 05000416/2016007-04;
- (4) Failure to submit an annual effluent report in accordance with 10 CFR 72.44(d)(3); licensee-identified NCV documented in Inspection Report 05000416/2017002;
- (5) Failure to report the results of the visual inspections of all accessible, susceptible locations of the steam dryer to the NRC staff within 60 days following startup in accordance with License Condition 2.C(46)(f), licensee-identified NCV documented in Inspection Report 05000416/2017002;

- (6) Failure to submit a long-term steam dryer inspection plan based on industry operating experience along with the baseline inspection results for NRC review and approval in accordance with License Condition 2.C(46)(g), licensee-identified NCV documented in Inspection Report 05000416/2017002;
- (7) Failure to notify the NRC within 4 hours of the occurrence of any event or condition that resulted in actuation of the reactor protection system when the reactor was critical in accordance with 10 CFR 50.72(b)(2)(iv)(B), licensee-identified NCV documented in Inspection Report 05000416/2017002;
- (8) Failure to Update the Final Safety Analysis Report, NRC-identified NCV 05000416/2017007-04 (three examples);
- (9) Failure to make a timely event report for an event or condition that could have prevented fulfillment of a safety function (accident mitigation), licensee-identified NCV documented in Inspection Report 05000416/2018001;
- (10) Failure to Update the Updated Final Safety Analysis Report, NRC-identified NCV 05000416/2018004-01;
- (11) Failure to Update the Updated Final Safety Analysis Report, NRC-identified NCV 05000416/2019002-01.

In April 2019, two inspectors performed Inspection Procedure 92723, "Follow-up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period." The inspectors reviewed the licensee's cause evaluations and corrective actions associated with the issues documented above as violations one through ten in order to determine whether the licensee's actions met the Inspection Procedure 92723 inspection objectives, which include: (1) providing assurance that the cause(s) of multiple Severity Level IV traditional enforcement violations are understood by the licensee; (2) providing assurance that the extent of condition and extent of cause of multiple Severity Level IV traditional enforcement violations are identified; and (3) providing assurance that licensee corrective actions to traditional enforcement violations are sufficient to address the cause(s). At that point, the inspectors were not able to conclude that the actions taken by the licensee met the Inspection Procedure 92723 inspection objectives. The results of this inspection were documented in Integrated Inspection Report 05000416/2019002. The inspectors could not conclude that the inspection objectives were met because the collective evaluations and additional causal analyses were being revised as of the completion of the inspection. As a result of the inspection, the licensee voluntarily determined that the conclusions of its collective evaluations needed to be reconsidered. The licensee planned to re-evaluate and revise its collective evaluations (CR-GGN-2019-1002 and CR-GGN-2019-1003) associated with the 10 violations and to review the previous CR-GGN-2015-5057 root cause analysis to ensure that the causes, extent of condition evaluations, extent of cause evaluations, and corrective actions were adequate. The licensee generated Condition Report CR-GGN-2019-2717 to document that adverse condition analyses associated with evaluations CR-GGN-2019-1002 and CR-GGN-2019-1003 did not adequately evaluate issues with configuration control of design and licensing basis documentation. The licensee informed the inspectors that a cause evaluation would be completed to address this concern.

In February 2020, two inspectors returned to review the additional actions taken by the licensee in response to the previous inspection efforts. In addition, the inspectors reviewed the

evaluation associated with the violation documented above as number eleven. The inspectors reviewed the revised cause evaluations and updated corrective actions associated with these issues to determine whether the licensee’s additional actions met the Inspection Procedure 92723 inspection objectives.

The inspectors reviewed the licensee’s collective evaluations (completed at the “Condition Analysis” level) associated with the violations, including evaluations closed to or referenced in the collective evaluations. The evaluations reviewed included:

- (1) CR-GGN-2019-1002, “50.59 Evaluations not Conducted as Required,” which evaluated the causes of 10 CFR 50.59 related violations (three issues with four total examples)
- (2) CR-GGN-2019-1003, “Failure to Submit Reports to the NRC,” which evaluated the causes of failures to make reports to the NRC (five issues/examples) and failures to update the Final Safety Analysis Report (two issues with four total examples)
- (3) CR-GGN-2019-2717, “Failure to Update UFSAR,” which evaluated the causes of failures to update the Final Safety Analysis Report (two issues with four total examples)
- (4) CR-GGN-2019-2948, “Fire Barrier in 06-OP-SP64-R-0047 and the UFSAR do not align,” which evaluated the causes of failures to update the Final Safety Analysis Report with respect to fire barriers (one issue/example)

## INSPECTION RESULTS

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| Assessment: Problem Identification   | 92723 |
| The inspectors determined that the licensee’s evaluations identify how each of the issues were identified, how long each issue existed, and prior opportunities for identification. The inspectors did not identify any deficiencies and concluded the inspection objective was met. |       |

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| Assessment: Cause, Extent of Condition and Extent of Cause Evaluations   | 92723 |
| <p>a. The inspectors determined that each group of Severity Level IV (SL-IV) violations received an evaluation at an appropriate level of detail using systematic methods to identify causes. The inspectors did not identify any deficiencies and concluded the inspection objective was met.</p> <p>b. The inspectors determined that the evaluations included a consideration of how prior occurrences in the same traditional enforcement area were addressed by the licensee, with some weaknesses.</p> <p>The cause evaluations reviewed in April 2019 initially included a review of prior occurrences in the same traditional enforcement area within the three years preceding completion of each evaluation. However, the licensee has had 23 SL-IV NCVs associated with impeding the regulatory process within the past eight years, including the 11 included in this inspection. Based on the significant number of issues, it would have been appropriate to consider all these prior occurrences to determine whether there were other factors that prevented the previous corrective actions from being effective. The inspectors noted that after the April 2019 inspection team identified this weakness, the licensee included a discussion of one condition report associated with prior violations, CR-GGN-2015-5057, in the revised evaluations contained in Condition Reports CR-GGN-2019-01002 and CR-GGN-2019-02717. However, other violations evaluated in Condition Reports CR-GGN-2014-03335 and</p> |       |

CR-GGN-2015-06047 were not included as relevant operating experience in the revised evaluations. The inspectors reviewed these cause evaluations and did not identify any information that would have led to a change in the conclusions of the current evaluations. Overall, the inspectors concluded that the inspection objective was met.

- c. The inspectors determined that the evaluations addressed the extent of condition and the extent of cause of the problem, with some weaknesses.

The inspectors did not identify any deficiencies with the evaluations documented in Condition Reports CR-GGN-2019-1003 and CR-GGN-2019-2717.

The inspectors noted that the extent of condition review for one condition identified in the evaluation documented in Condition Report CR-GGN-2019-02948 was credited to an action that had not yet been completed. This action is to perform a complete review of the Updated Final Safety Analysis Report content against the current plant design documents to identify other procedures for protection against external events that are not aligned with the Updated Final Safety Analysis Report. The action is currently scheduled for completion in December 2021.

In addition, the inspectors had some concerns with the extent of condition review associated with the evaluation documented in Condition Report CR-GGN-2019-01002. This evaluation was associated with violations of 10 CFR 50.59 and focused on multiple examples of evaluations required by 10 CFR 50.59(d) to determine whether changes to the plant required prior NRC approval. The inspectors used the guidance in Inspection Procedure 92723 to determine whether the extent of condition review met the inspection objective.

As part of the review, the licensee evaluated whether the actual condition existed in other areas. The licensee used Procedure EN-LI-118, "Cause Evaluation Process," to perform the extent of condition review. The licensee considered the most likely area for the condition to exist to be in other 10 CFR 50.59 evaluations that were performed in the same time frame as the ones identified in the violations. These evaluations were also considered to be the most likely to impede the regulatory process if not performed correctly. The licensee reviewed all 50.59 evaluations completed using the licensee's Procedure EN-LI-101, "10 CFR 50.59 Evaluations," from 2014 to 2016 that concluded the change did not require NRC approval, in order to determine if any of the evaluations were either not conducted as required or came to an incorrect conclusion. The licensee did not identify any evaluations that should have resulted in seeking prior approval to make the associated changes. However, one evaluation included in the review was one of the examples in NRC-identified NCV 05000416/2016007-03. This evaluation was not recognized as inadequate by the reviewer. This failure to recognize an inadequate evaluation in the extent of condition review was identified by the licensee in Condition Report CR-GGN-2018-04698. In addition, the inspectors determined based on the licensee's evaluation that the identified causes of this condition existed prior to 2014, outside of the time frame included in the review.

The inspectors had concerns that the review did not cover the full time period during which inadequate evaluations may exist, and that the reviewer was not able to recognize an inadequate evaluation. Based on these concerns, the inspectors



independently reviewed a sample of other 10 CFR 50.59 evaluations performed from 2011 to 2013 selected based on the significance of the associated change. The inspectors did not identify any additional improperly completed or technically inadequate evaluations.

Although the licensee's Procedure EN-LI-118 did not require further reviews for the level of evaluation that was performed, the licensee used the procedure to review other similar types of evaluations to determine whether they may have had similar deficiencies. The inspectors determined that these additional reviews performed by the licensee were not effective in identifying the potential for similar conditions to exist in these other areas and were not fully performed in accordance with the procedure. This deficiency is discussed in more detail in the observation section documented below.

The inspectors ultimately concluded that the extent of condition review performed by the licensee, in conjunction with the inspectors' independent review, was adequate to ensure that the extent of condition of inadequate 10 CFR 50.59 evaluations was addressed. In addition, the inspectors did not identify any deficiencies with the extent of cause reviews. However, the inspectors determined that the additional discretionary reviews of other evaluations performed by the licensee were not effective. Because the inspectors concluded that these additional reviews were not required in order to meet the inspection objective, the inspectors concluded that the inspection objective was met.

Assessment: Corrective Actions

92723

- a. The inspectors determined that appropriate corrective actions are specified for each cause identified for the group of violations or that there is an evaluation indicating that no actions are necessary. The inspectors did not identify any deficiencies and concluded the inspection objective was met.
- b. The inspectors determined that the corrective actions have been prioritized with consideration of the regulatory compliance. One corrective action was incorrectly closed to the license basis document change request process. The licensee entered this deficiency into their corrective action program. The inspectors did not identify any additional deficiencies and concluded the inspection objective was met.
- c. The inspectors determined that a schedule has been established for implementing and completing the corrective actions. The inspectors did not identify any deficiencies and concluded the inspection objective was met.
- d. The inspectors determined that measures of success have been developed for determining the effectiveness of the corrective actions to prevent recurrence, with some weaknesses.

The licensee addresses measures for determining the effectiveness of corrective actions by performing "effectiveness reviews" using Procedure EN-LI-118, "Cause Evaluation Process." The inspectors reviewed the effectiveness reviews for the four collective evaluations. The inspectors determined that the planned effectiveness reviews associated with the evaluation documented in Condition Report CR-GGN-2019-02948 did not adequately address all the corrective actions associated with the causal factors. The inspectors also identified deficiencies with the

planned effectiveness reviews associated with the evaluation documented in Condition Report CR-GGN-2019-01002, including failure to meet the requirements of Procedure EN-LI-118 and failure to document the plan correctly in the corrective action program database. The licensee entered these deficiencies into their corrective action program. Overall, the inspectors concluded that the inspection objective was met.

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| Observation: Additional Extent of Condition Reviews were not Performed in Accordance with Licensee Procedures | 92723 |
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The inspectors examined additional extent of condition reviews that the licensee performed to determine whether other evaluations, aside from the 10 CFR 50.59 evaluations performed to determine whether changes to the plant required prior agency approval, had similar problems to those identified with the 10 CFR 50.59 evaluations.

These additional extent of condition reviews were intended to be performed in accordance with the guidance of Procedure EN-LI-118, "Causal Evaluation Process." Procedure EN-LI-118, "Causal Evaluation Process," Revision 29, was in effect at the time the evaluation was completed. The procedure describes how to perform a review of extent of condition in Attachment 9.5. The guidance uses a matrix to determine the level of review based on the perceived likelihood of the condition and the perceived consequence of the condition. When considering additional types of evaluations to review, the licensee determined that one type of similar evaluation met the threshold for performing additional reviews. These were evaluations performed using Procedure EN-LI-100, "Process Applicability Determination," to determine whether any regulations applied to the change. The licensee referred to these types of evaluations as process applicability determinations (PADs). The results of these evaluations determined whether more in-depth evaluations, including possibly 10 CFR 50.59 evaluations, would be performed.

The matrix in Procedure EN-LI-118, Attachment 9.5, allowed the licensee to either correct this extent of condition or provide a basis for not correcting it. The attachment also provides the following guidance for reviewing potential conditions with a large sample size:

"For potential conditions with a large sample size ... sampling may be utilized to support or refute condition existence; however, the sample size should be selected based upon probability of occurrence and significance to safe operations (if the condition is not identified) AND the basis for the sample size selection should be documented."

The licensee credited the action performed under Condition Report CR-GGN-2016-8298, Corrective Action CA-8, "Perform a sample of PADs performed within the past three years to verify changes did not inappropriately screen out of the 50.59 process," as the review to identify and correct any extent of condition that might exist in PADs.

The inspectors examined the review. The reviewer had selected a sample of only 20 PADs out of a total of 1,490 engineering changes performed during the time period from 2014 to 2017. The inspectors found that the licensee did not document the basis for the sample size selection. The inspectors also noted that Procedure EN-LI-118 does not contain any detailed guidance on how to select a sample size. However, the inspectors observed that the licensee had used another procedure, Procedure EN-QV-109, "Audit Process," to select a sample size for other extent of condition reviews. This procedure references the sample size selection guidance in ANSI/ASQ Z1.4, an industry standard for sampling procedures. Had

the licensee used Procedure EN-QV-109 or ANSI/ASQ Z1.4, the reviewer should have selected a sample of at least 50 or 125 PADs, respectively. The licensee did not follow the guidance for sample size in either EN-QV-109 or the standard it references, ANSI/ASQ Z1.4.

The reviewer did not identify any PADs that were inadequate in the review; however, multiple examples of the condition in question were discovered through additional inspection.

In 2019, the licensee performed an extent of condition review of licensing basis document change request (LBDCRs) that consisted of 52 out of 586 LBDCRs conducted between 2015 and 2018. This review identified one PAD that was performed incorrectly for LBDCR 2015-047. This was documented in Condition Report CR-GGN-2019-5609. The associated engineering change was included in the population of 1,490 but was not one of the 20 that were included in the initial review.

Because of the low number of sampled PADs, the inspectors reviewed an additional sample of 10 PADs from the original population of 1,490. In this sample of 10, the inspectors identified 2 PADs that were performed incorrectly. The licensee entered these into their corrective action program as Condition Reports CR-GGN-2020-03239 and CR-GGN-2020-03240.

The inspectors concluded that the licensee did not establish a basis for the sample size of the review that was performed and did not review a reasonably sized sample based on available standards. Furthermore, three incorrectly performed PADs were identified outside of the review that could have been identified as part of a larger sample. Based on the above, the team did not consider the additional extent of condition review performed for PADS to meet the requirements of Procedure EN-LI-118. Because the additional review was not a regulatory requirement, the licensee entered both the deficiencies and the inadequacy of the review into their corrective action program, and the inadequately performed PADs did not impede the regulatory process or meet any of the criteria for a more-than-minor reactor oversight process finding, the inspectors documented this as an observation.

## **EXIT MEETINGS AND DEBRIEFS**

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

- On April 1, 2020, the inspectors presented the traditional enforcement follow-up inspection results to Mr. E. Larson, Site Vice President, and other members of the licensee staff.

**DOCUMENTS REVIEWED**

| Inspection Procedure | Type                        | Designation       | Description or Title  | Revision or Date |
|----------------------|-----------------------------|-------------------|---|------------------|
| 92723                | Corrective Action Documents | CR-GGN-           | 2013-4704, 2014-3335, 2015-5057, 2015-6047, 2016-8298, 2016-8328, 2016-9755, 2016-9757, 2017-1493, 2017-3404, 2017-7970, 2017-9747, 2018-1595, 2018-4698, 2019-1002, 2019-1003, 2019-1007, 2019-1047, 2019-1185, 2019-1390, 2019-1391, 2019-2717, 2019-2948, 2019-5609, 2019-5630, 2020-0910, 2020-1131, 2020-1132, 2020-1175, 2020-1181, 2020-1203, 2020-1215, 2020-1217, 2020-1227, 2020-1234, 2020-1248, 2020-1273, 2020-3239, 2020-3240, 2020-3807, 2020-5872 |                  |
| 92723                | Corrective Action Documents | CR-HQN-           | 2018-1259   |                  |
| 92723                | Miscellaneous               | EC 47473          | Update SSW Inventory Leakage Calculation MC-Q1P41-03016 to Remove Conservatism  | 0                |
| 92723                | Miscellaneous               | EC 57214          | Lower Reactor Water Level Setpoint Setdown Setpoint and Raise High Reactor Reactor Water Level 9 Trip Setpoint  | 0                |
| 92723                | Miscellaneous               | EC 69026          | Update UHS Heat Load Calculation MC-Q1P41-11001 and Make Historical SSW System Leakage Calculation MC-Q1P41-03016   | 0                |
| 92723                | Miscellaneous               | EC 84059          | Refueling Outage Decay Heat Issues  | 0                |
| 92723                | Miscellaneous               | LO-GLO-2019-00044 |   |                  |
| 92723                | Miscellaneous               | LO-GLO-2019-00048 |   |                  |
| 92723                | Miscellaneous               | LO-GLO-2019-00074 |   |                  |
| 92723                | Miscellaneous               | LO-GLO-2019-00075 |   |                  |
| 92723                | Miscellaneous               | LO-GLO-2019-00107 |   |                  |
| 92723                | Miscellaneous               | LO-GLO-2019-00235 |   |                  |
| 92723                | Miscellaneous               | LR-LAR-2019-      |   |                  |

| Inspection Procedure | Type          | Designation | Description or Title   | Revision or Date |
|----------------------|---------------|-------------|--|------------------|
|                      |               | 00192       |  |                  |
| 92723                | Miscellaneous | SE 2011-001 | LDC 2010-031 for Technical Specification Bases 3.6.5.1.1   | 0                |
| 92723                | Miscellaneous | SE 2012-002 | ECN 33228 (EC 22768, 3ECN 29767, ECN 25668)  | 0                |
| 92723                | Miscellaneous | SE 2012-003 | Allow Operation of the SSW Basin Below 7.25 Feet per TRM 3.7.1.1   | 0                |
| 92723                | Miscellaneous | SE 2013-004 | Evaluation to allow ESF Room Coolers 1T4680018 and 1T4680028 to be out of service (at different times) per TRM 6.7.1 | 0                |
| 92723                | Procedures    | 01-S-15-1   | GGNS Plant Reporting Requirements  | 7                |
| 92723                | Procedures    | 08-S-08-5   | Environmental Reporting  | 113              |
| 92723                | Procedures    | EN-DC-115   | Engineering Change Process   | 19               |
| 92723                | Procedures    | EN-DC-115   | Engineering Change Process   | 27               |
| 92723                | Procedures    | EN-DC-213   | Engineering Quality Review   | 7                |
| 92723                | Procedures    | EN-LI-100   | Process Applicability Determination  | 18               |
| 92723                | Procedures    | EN-LI-100   | Process Applicability Determination  | 26               |
| 92723                | Procedures    | EN-LI-101   | 10 CFR 50.59 Evaluations   | 18               |
| 92723                | Procedures    | EN-LI-102   | Corrective Action Program  | 27               |
| 92723                | Procedures    | EN-LI-102   | Corrective Action Program  | 29               |
| 92723                | Procedures    | EN-LI-102   | Corrective Action Program  | 36               |
| 92723                | Procedures    | EN-LI-102   | Corrective Action Program  | 37               |
| 92723                | Procedures    | EN-LI-118   | Causal Analysis Process  | 23               |
| 92723                | Procedures    | EN-LI-118   | Causal Analysis Process  | 29               |
| 92723                | Procedures    | EN-LI-118   | Causal Analysis Process  | 30               |
| 92723                | Procedures    | EN-QV-109   | Audit Process  | 32               |
| 92723                | Procedures    | EN-QV-109   | Audit Process  | 35               |