



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

February 5, 2021

Mr. John Krakuszeski
Site Vice President
Duke Energy Progress, LLC
470 River Road, SE (M/C BNP001)
Southport, NC 28461

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT – INTEGRATED INSPECTION
REPORT 05000324/2020004 AND 05000325/2020004; 07200006/2020002

Dear Mr. Krakuszeski:

On December 31, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Brunswick Steam Electric Plant. On January 28, 2021, the NRC inspectors discussed the results of this inspection with Mr. Jay Ratliff 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,

/RA/

Stewart N. Bailey, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Docket Nos. 05000324 and 05000325
License Nos. DPR-62 and DPR-71

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT – INTEGRATED INSPECTION
 REPORT 05000324/2020004 AND 05000325/2020004: 07200006/2020002
 Dated February 4, 2021

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

Docket Numbers: 05000324 and 05000325

License Numbers: DPR-62 and DPR-71

Report Numbers: 05000324/2020004 and 05000325/2020004; 07200006/2020002

Enterprise Identifier: I-2020-004-0053; I-2020-002-0080

Licensee: Duke Energy Progress, LLC

Facility: Brunswick Steam Electric Plant

Location: Southport, NC

Inspection Dates: October 01, 2020 to December 31, 2020

Inspectors: G. Smith, Senior Resident Inspector
J. Steward, Resident Inspector
D. Bacon, Senior Operations Engineer
C. Fontana, Emergency Preparedness Inspector
S. Sanchez, Senior Emergency Preparedness Insp
J. Walker, Emergency Response Inspector

Approved By: Stewart N. Bailey, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Brunswick Steam Electric Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

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

Additional Tracking Items

None.

PLANT STATUS

Unit 1 began the period at 100 percent (full) rated thermal power (RTP) and operated there until October 25, 2020, when power was reduced to 82 percent RTP due to planned maintenance on the Weatherspoon line. Following maintenance on the high voltage line, the unit was returned to full RTP where it continued to operate until November 13, when power was reduced to 70 percent RTP for a planned control rod sequence exchange and turbine valve testing. Following the testing and sequence exchange, as well as two follow on rod improvements, the unit was restored to full RTP on November 16, where the unit continued to operate for the remainder of the period.

Unit 2 began the period at full RTP and operated there until October 6, when power was reduced to 97 percent RTP due to excessive temperatures measured on the 'C' phase no-load disconnect of the main generator. The unit remained at 97 percent RTP until October 9 when the main generator was taken offline and the reactor output was reduced to 20 percent RTP. Following repairs to the no-load disconnect, the unit was synced to the grid on October 9 and power was restored to full RTP on October 13. The unit continued to operate at full RTP until November 6 when power was reduced to 70 percent RTP for a planned control rod sequence exchange and turbine valve testing. Following the testing and sequence exchange, as well as two follow-on rod improvements, the unit was restored to full RTP on November 10, where the unit continued to operate for the remainder of the period. The only exceptions were three separate and brief (less than one day) power reductions to 75 percent conducted for rod improvements on November 24, December 11 and December 21.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed plant status activities described in IMC 2515, Appendix D, "Plant Status," and conducted routine reviews using IP 71152, "Problem Identification and Resolution." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the Coronavirus Disease 2019 (COVID-19), resident inspectors were directed to begin teleworking and to remotely access licensee information using available technology. During this time, the resident inspectors performed periodic site visits each week; conducted plant status activities as described in IMC 2515, Appendix D, "Plant Status"; observed risk-significant activities; and completed on-site portions of IPs. In addition, resident and regional baseline inspections were evaluated to determine if all or portions of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on-site. The inspections documented below met the objectives and requirements for completion of the IP.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather Sample (IP Section 03.01) (1 Sample)

- (1) On December 31, the inspectors completed an evaluation of the readiness for seasonal extreme weather conditions prior to the onset of seasonal cold temperatures for the following systems: service water system and emergency diesel generators.

71111.04 - Equipment Alignment

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

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Emergency Diesel Generator (EDG)-4 while EDG-3 was out of service (OOS) for planned maintenance on November 6, 2020
- (2) Unit 2 'A' residual heat removal (RHR) train while the 'B' RHR train was OOS for a planned outage on November 19, 2020
- (3) Unit 2 'B' RHR train while the 'A' RHR train was OOS for a planned outage on December 9, 2020

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated system configurations during a complete walkdown of the safety-related high pressure coolant injection (HPCI) system on November 24, 2020.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Augmented Off-Gas Building on December 2, 2020
- (2) Service Water Building, 13 ft 4 in and 4 ft elevation (EL), on December 3, 2020
- (3) Service Water Building Pump Area, 20 ft EL, on December 3, 2020

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (1 Sample)

On December 31, the inspectors completed an evaluation of the internal flooding mitigation protections in the:

- (1) Service Water Building

Cable Degradation (IP Section 03.02) (1 Sample)

The inspectors evaluated cable submergence protection in:

- (1) Manhole, 2-MH-WT3, in accordance with work order (WO) 20417097 on November 10, 2020

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

Requalification Examination Results (IP Section 03.03) (1 Sample)

The licensee completed the annual requalification operating examinations required to be administered to all licensed operators in accordance with Title 10 of the *Code of Federal Regulations* 55.59(a)(2), "Requalification Requirements," of the NRC's "Operator's Licenses." During the week of November 23, 2020, the inspector performed an in-office review of the overall pass/fail results of the individual operating examinations and the crew simulator operating examinations in accordance with Inspection Procedure (IP) 71111.11, "Licensed Operator Requalification Program." These results were compared to the thresholds established in Section 3.02, "Requalification Examination Results," of IP 71111.11.

- (1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam completed on September 30, 2020.

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

- (1) The inspectors observed and evaluated licensed operator performance in the control room during a Unit 2 downpower to 89 percent for a planned rod improvement on December 21, 2020.

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated two separate licensed operator crews during execution of licensee-evaluated simulator scenarios on November 11, 2020. The simulator scenario involved the following:
 - Average power range monitor critical fault,
 - '2B' condensate booster pump trip
 - Loss of the '2D' balance-of-plant 4160V bus
 - HPCI flow indicating controller power loss
 - Small break loss of coolant accident (LOCA)
 - Automatic depressurization timer failure
 - Emergency depressurization at top of active fuel

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

On December 31, 2020, the inspectors completed an evaluation of the effectiveness of maintenance to ensure the following structures, systems, and components (SSCs) remained capable of performing their intended function:

- (1) Failure of 2-E41-F003, HPCI isolation valve, to stroke closed (CR 2334678) on June 11, 2020
- (2) Valve 1-E51-F007, reactor recirculation isolation cooling (RCIC) inboard isolation valve, failed local leak rate testing (CR 2318815) on March 2, 2020

Aging Management (IP Section 03.03) (1 Sample)

The inspectors evaluated the effectiveness of the aging management program for the following SSCs that did not meet their inspection or test acceptance criteria:

- (1) Fire Protection Service Water Sprinkler System Buried Pipe Failure (NCR 2348007) on November 28, 2020

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Unit 2 elevated risk due to 2C conventional service water pump unavailable due to maintenance on October 21, 2020
- (2) Unit 2 elevated risk due to a planned outage on the 'B' train RHR system from November 16 to November 18
- (3) Unit 2 elevated risk due to a planned outage on the 'A' train RHR system on December 10

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (4 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Ground on the 250 VDC 1A Battery System (NCR 2351669)
- (2) Station Battery Rack End Spacing (NCR 2353064)
- (3) Non-EQ parts used to repair penetration1-X-104A (NCR 2362162)
- (4) Replace 1-E11-F047B-MO (EQ Cycles) (NCR 2349816)

71111.19 - Post-Maintenance Testing

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

The inspectors evaluated the following post-maintenance test activities to verify system operability and functionality:

- (1) 2PT-24.1-2, Service Water Pump and Discharge Valve Operability Test following maintenance on the 2C conventional service water (CSW) pump strainer on October 21, 2020
- (2) Post maintenance test (PMT) on EDG-1 following planned maintenance outage on August 27, 2020 in accordance with (IAW) 0PT12.2A, No. 1 Diesel Generator Monthly Load Test, Rev. 120
- (3) PMT 2A Conventional Service Water Pump following Discharge Strainer inspection IAW WO 20340445 on November 6, 2020
- (4) EDG-4 Monthly Load Test following replacement of lube oil temperature control valve thermal element (power pill) IAW work order (WO) 20377260 on November 19, 2020.
- (5) PMT on 2-E11-F007B, RHR Pump B Minimum Flow Bypass Valve following Limatorque MOV maintenance and Diagnostic Testing IAW WO 20304710 on December 2, 2020

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (4 Samples)

- (1) Standby Gas Treatment System Operability Test on November 12, 2020
- (2) Reactor protection system (RPS) Scram Discharge Volume Hi Water Level Channel Functional Test and Channel Calibration on November 25, 2020
- (3) 0PT-07.2.4A, Core Spray System Operability Test - Loop A (RS)
- (4) 0PT-12.2C, No. 3 Diesel Generator Monthly Load Test, Rev 120

Inservice Testing (IP Section 03.01) (1 Sample)

- (1) LPCI/RHR System Operability Test – Loop ‘B’ on November 5, 2020

FLEX Testing (IP Section 03.02) (1 Sample)

- (1) 0PT-12.27, Flex Diesel Generator 1 and 2 Test Procedure (FLEX) on November 23, 2020.

71114.01 - Exercise Evaluation

Inspection Review (IP Section 02.01-02.11) (1 Sample)

- (1) The inspectors evaluated the biennial emergency plan exercise during the week of November 30, 2020. The simulated scenario began with an existing minor fuel defect that worsened when a main turbine control valve failed closed, causing a positive reactivity spike, increased radiation levels in the reactor coolant, and ultimately, a manual reactor scram. A steam line break in the reactor water cleanup system

occurred, thus meeting the conditions for declaring a Site Area Emergency due to loss of the reactor coolant system and loss of primary containment. Eventually, main stack radiation readings used for dose assessment reached 5000 mrem thyroid committed dose equivalent at or beyond the site boundary. This met the conditions for declaring a General Emergency, and eventually allowed the Offsite Response Organizations to demonstrate their ability to implement emergency actions.

71114.04 - Emergency Action Level and Emergency Plan Changes

Inspection Review (IP Section 02.01-02.03) (1 Sample)

- (1) The inspectors evaluated submitted Emergency Action Level, Emergency Plan, and Emergency Plan Implementing Procedure changes during the week of November 30, 2020. This evaluation does not constitute NRC approval.

71114.06 - Drill Evaluation

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

The inspectors evaluated:

- (1) Licensed operator requalification simulator training observation on November 11, 2020.

71114.08 - Exercise Evaluation Scenario Review

Inspection Review (IP Section 02.01 - 02.04) (1 Sample)

- (1) The inspectors reviewed and evaluated in-office, the proposed scenario for the biennial emergency plan exercise at least 30 days prior to the day of the exercise.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

EP01: Drill/Exercise Performance (IP Section 02.12) (1 Sample)

- (1) Unit 1 (April 1, 2019, through September 30, 2020)
Unit 2 (April 1, 2019, through September 30, 2020)

EP02: ERO Drill Participation (IP Section 02.13) (1 Sample)

- (1) Unit 1 (April 1, 2019, through September 30, 2020)
Unit 2 (April 1, 2019, through September 30, 2020)

EP03: Alert & Notification System Reliability (IP Section 02.14) (1 Sample)

- (1) Unit 1 (April 1, 2019, through September 30, 2020)
Unit 2 (April 1, 2019, through September 30, 2020)

MS07: High Pressure Injection Systems (IP Section 02.06) (2 Samples)

- (1) Unit 1 (October 01, 2019 through September 30, 2020)
- (2) Unit 2 (October 01, 2019 through September 30, 2020)

MS08: Heat Removal Systems (IP Section 02.07) (2 Samples)

- (1) Unit 1 (October 01, 2019 through September 30, 2020)
- (2) Unit 2 (October 01, 2019 through September 30, 2020)

MS09: Residual Heat Removal Systems (IP Section 02.08) (2 Samples)

- (1) Unit 1 (October 01, 2019 through September 30, 2020)
- (2) Unit 2 (October 01, 2019 through September 30, 2020)

71152 - Problem Identification and Resolution

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

- (1) On December 31, 2020, the inspectors completed a review of the licensee's corrective action program. This review focused on identifying any trends that might be indicative of a more significant safety issue. Observations are documented in the results section of this report

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

As part of the annual follow-up for selected issues (AFSI), the inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

- (1) AFSI: NCR 2321700 - All Bypass Valves Failed Open on Unit 1
- (2) AFSI: NCR 2321942 - Safety Relief Valve 'F' Investigate and Repair

71153 - Followup of Events and Notices of Enforcement Discretion

Personnel Performance (IP Section 03.03) (1 Sample)

- (1) The inspectors evaluated a Unit 1 loss of off-site power event and the licensee's performance on August 4, 2020.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

60855.1 - Operation of an Independent Spent Fuel Storage Installation at Operating Plants

Operation of an Independent Spent Fuel Storage Installation at Operating Plants (1 Sample)

- (1) The inspectors evaluated the licensee's activities related to long-term operation and monitoring of their independent spent fuel storage installation (ISFSI). The inspectors performed a tour of the ISFSI platform including the roof area to evaluate the overall operation of the dry cask system. Additionally, the inspectors evaluated the licensee's independent spent fuel storage installation Unit 2 cask loading of Canister

BNP-61BTH-2-E-2H-CH01 (CH01) on October 19, 2020, and Canister BNP-61BTH-2-E-2H-CH02 (CH02) on October 26, 2020. Specifically, the inspectors evaluated the following activities:

- Fuel selection and fuel loading
- Heavy load movement of loaded dry storage canister CH01 into horizontal storage module (HSM) 42 on October 22, 2020, and loaded dry storage canister CH02 into HSM 44 on October 30, 2020
- Drying and backfill evolutions
- Closure welding and non-destructive weld evaluations
- Transfer and transport evolutions
- Radiological field surveys

INSPECTION RESULTS

Observation: Semi-Annual Trend Review	71152
<p>The inspectors performed a trend analysis on the licensee’s corrective action program to identify trends that could indicate the existence of a more significant safety issue. The inspectors focused their review on equipment performance trends, but also considered the results of inspector daily condition report screenings, licensee trending efforts, and licensee human performance results. The review nominally considered the 6-month period of July 2020 through December 2020, although some examples extended beyond those dates when the scope of the trend warranted. The inspectors compared their results with the licensee’s analysis of trends. Additionally, the inspectors reviewed the adequacy of corrective actions associated with a sample of the issues identified in the licensee’s trend reports. The inspectors also reviewed corrective action documents that were processed by the licensee to identify potential adverse trends in the condition of structures, systems, and/or components as evidenced by acceptance of long-standing non-conforming or degraded conditions.</p> <p>This trend analysis focused on valve and pump failures based on the inspectors daily review of the condition reports entered into the corrective action program. However, upon a more detailed review, the inspectors noted that the failures, in totality, did not arise to a significant trend. The most significant failure (CR2343883) was documented on August 3, 2020, where post removal testing discovered that three safety relief valves on Unit 1 had failed their lift acceptance criteria.</p>	

Observation: Annual Follow-up of Selected Issue: Unit 1 manual scram due to unexpected opening of all steam bypass valves	71152
<p>The inspectors conducted a detailed review of CR 2321700, “Unit 1 All Bypass Valves Failed Open.” The inspectors chose this sample because it dealt with a significant breakdown in the procedural development, review, and execution process where a procedural weakness was not identified and operators not familiar with the procedure made errors in setting the reactor coolant system pressure in the turbine control system. This ultimately led to a manual reactor trip. The licensee performed a detailed root cause analysis and developed several corrective actions to address the deficiencies. The inspectors determined that the licensee’s plan to address this issue was reasonably commensurate with the safety significance of equipment that might be affected by this type of programmatic failure.</p>	

A non-cited violation for this issue was documented in inspection report 05000325/324/2020002 as item NCV 05000325/2020002-01. The intent of this focused review was to ensure the corrective actions adequately addressed this review.

Observation: Annual Follow-up of Selected Issue: Failure of safety relief valve (SRV) results in forced reactor shutdown	71152
<p>The inspectors conducted a detailed review of CR 2321942, "SRV 'F' Investigate/Repair." The inspectors chose this sample because it dealt with a failure of the 'F' SRV in conjunction with a failure of its associated vacuum breaker. Failures of both valves resulted in reactor coolant system leakage directly into the drywell which necessitated a plant shutdown. The licensee performed a detailed root cause analysis and developed several corrective actions to address the deficiencies.</p> <p>The root cause was determined to be loosening of the stem-to-piston connection in the main body assembly. This ultimately led to a misalignment of the piston in the main body of the SRV. The corrective actions included replacing the 'F' SRV as well as upgrading the preventative maintenance program to replace SRVs after 24 valve cycles to minimize the loosening of the piston connection. A detailed material analysis was used to understand the fretting wear of the threaded stem/piston joint. The leakage past the vacuum breaker was due to securing the routine containment purge which led to a temporary increase in drywell pressure. This elevated drywell pressure essentially allowed the vacuum breaker to temporarily open and allow steam from the 'F' SRV into the drywell. Ultimately, the licensee determined that excessive valve cycles could eventually lead to this phenomenon. The inspectors determined that the licensee's plan to address this issue was reasonably commensurate with the safety significance of equipment that might be affected by this type of equipment failure.</p>	

EXIT MEETINGS AND DEBRIEFS

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

- On January 28, 2021, the inspectors presented the integrated inspection results to Mr. Jay Ratliff and other members of the licensee staff.
- On December 4, 2020, the inspectors presented the Emergency Preparedness Exercise Inspection results to Mr. J. Krakuszeski and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
60855.1	Procedures	0ISFS-102	DSC Loading and Storage	9
		0ISFS-103	ISFS HSM Temperature Monitoring	3
		0ISFS-105	NUHOMS 61 BTH Dry Storage Canister Welding	8
	Work Orders	20346185		11/10/2020
71111.01	Procedures	0AP-62	Seasonal Preparations	7
		AD-WC-ALL 0230	Seasonal Readiness	1
71111.04	Drawings	D-02523 Sheet 1	Reactor Building High Pressure Coolant Injection System Piping Diagram	59
		D-02523 Sheet 2	Reactor Building High Pressure Coolant System Piping Diagram	54
		D-25023 Sheet 1	Reactor Building High Pressure Coolant Injection System Piping Diagram	61
		D-25023 Sheet 2	High Pressure Coolant Injection System Piping Diagram	54
	Procedures	0OP50.1	Diesel Generator Emergency Power System Operating Procedure	99
		1OP-19	High Pressure Coolant Injection Operating Procedure	100
		2OP-17	Residual Heat Removal Operating System	182
		2OP-19	High Pressure Coolant Injection System Operating Procedure	146
		SD-17	Residual Heat Removal System	20
		SD-39	Emergency Diesel Generators	22
71111.05	Fire Plans	0PFP-13	General Fire Plan	54
		AD-EG-ALL-1532	NFPA 805 Pre-Fire Plans	1
	Procedures	0PLP-01.2	Fire Protection System Operability, Action, and Surveillance Requirements	51
		AD-EG-ALL-1520	Transient Combustible Control	13
71111.06	Calculations	0MISCEL-1044	Internal Flood Quantification for Service Water Intake Structure	0
	Procedures	DBD-144	External and Internal Flooding Topical Design Basis Document	1

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Work Orders	20417097		11/10/2020
		20417097	2-MH-WT3, Manhole Inspection	11/10/2020
		WO 20332833	2-X-LSH-3136, Functional check of SW intake level switch	12/03/2020
71111.11Q	Miscellaneous	LORX-001	Licensed Operator Requalification Scenario Drill Guide	18a
	Procedures	0GP-12	Power Changes	92
		AD-OP-ALL-1000	Conduct of Operations	17
71111.12	Corrective Action Documents	2348007	Fire Protection Service Water Sprinkler System Buried Pipe Leak	11/28/2020
	Miscellaneous	Electronic Database	MRule Manager	12/31/2020
		NUMARC 93-01	Industry Guidelines for monitoring the effectiveness of maintenance at Nuclear Power Plants	4A
	Procedures	AD-EG-ALL-1210	Maintenance Rule Program	2
	Work Orders	20412891	Underground pipe leak	11/28/2020
71111.13	Procedures	0AP-025	BNP Integrated Scheduling	59
		AD-OP-ALL-0201	Protected Equipment	7
		AD-WC-ALL-0200	On-Line Work Management	17
		AD-WC-ALL-0250	Work Implementation and Completion	12
		AD-WC-ALL-0410	Work Activity Integrated Risk Management	10
71111.15	Procedures	AD-OP-ALL-0105	Operability Determinations and Functionality Assessments	4
71111.19	Procedures	0PM-MO009	AC and DC Limitorque Motor Operated Valve Preventative Maintenance Procedure	21
		0PT-08.2.2B	LPCI/RHR System Operability Test - Loop B	109
		0PT-12.2D	No.4 Diesel Generator Monthly Load Test	123
	Work Orders	20304710		12/02/2020
		20340445		11/06/2020
		20377260		11/19/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.22	Procedures	0PT-08.2.2B	LPCI/RHR System Operability Test - Loop B	108
		0PT-15.6	Standby Gas Treatment System Operability Test	35
		2MST-RPS27Q	RPS Scram Discharge Volume Hi Water Level Channel Functional Test and Channel Calibration	20
	Work Orders	20407020		11/5/2020
71151	Procedures	AD-PI-ALL-0700	Performance Indicators	2
71152	Procedures	AD-PI-ALL-0100	Corrective Action Program	21