



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

May 12, 2021

Mrs. Maria Lacal, Executive Vice President
and Chief Nuclear Officer
Arizona Public Service Company
P.O. Box 52034, MS 7602
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION – INTEGRATED
INSPECTION REPORT 05000528/2021001 AND 05000529/2021001 AND
05000530/2021001

Dear Mrs. Lacal:

On March 31, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Palo Verde Nuclear Generating Station. On April 7, 2021, the NRC inspectors 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.

One finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the NRC Resident Inspector at Palo Verde Nuclear Generating Station.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; and the NRC Resident Inspector at Palo Verde Nuclear Generating Station.

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,

John L. Dixon, Jr., Chief
Reactor Projects Branch D
Division of Reactor Projects

Docket Nos. 05000528 and 05000529
and 05000530
License Nos. NPF-41, NPF-51 and NPF-74

Enclosure:
As stated

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PALO VERDE NUCLEAR GENERATING STATION UNITS 1, 2, AND 3.– INTEGRATED INSPECTION REPORT 05000528/2021001 AND 05000529/2021001 AND 05000530/2021001 – DATED MAY 12, 2021

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

Docket Numbers: 05000528, 05000529 and 05000530

License Numbers: NPF-41, NPF-51 and NPF-74

Report Numbers: 05000528/2021001, 05000529/2021001 and 05000530/2021001

Enterprise Identifier: I-2021-001-0090

Licensee: Arizona Public Service Company

Facility: Palo Verde Nuclear Generating Station

Location: Tonopah, AZ

Inspection Dates: January 1, 2021 to March 31, 2021

Inspectors: C. Peabody, Senior Resident Inspector
E. Lantz, Resident Inspector
N. Cuevas, Resident Inspector
R. Alexander, Senior Emergency Preparedness Inspector
N. Greene, Senior Health Physicist
G. Hansen, Senior Emergency Preparedness Inspector
A. Siwy, Senior Resident Inspector
S. Hedger, Emergency Preparedness Inspector
D. Reinert, Reactor Inspector
B. Baca, Health Physicist
D. Antonangeli, Health Physicist

Approved By: John L. Dixon, Jr., Chief
Reactor Projects Branch D
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 Palo Verde Nuclear Generating 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

Failure to Correctly Classify a Condition Adverse to Quality Associated with Turbine Driven Auxiliary Feed Water Pump			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000528, 05000529, 05000530/2021001-01 Open/Closed	[H.6] - Design Margins	71111.06
The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion V, for the licensee’s failure to disposition a condition adverse to quality associated with safety-related cables in accordance with the licensee’s condition reporting procedure. This has led to repeated water intrusion into Class 1E electrical conduits, which could degrade cabling and affect the reliability of the turbine driven auxiliary feedwater (AFW) pump.			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	05000528, 05000529, 05000530/2021001-02	10 CFR Part 37 Requirements URI	71124.08	Open

PLANT STATUS

Unit 1 operated at or near full power for the duration of the inspection period.

Unit 2 entered the inspection period at full power. Between February 22 through 25, 2021, the unit had a short-term planned down power to 40 percent for condenser leakage repairs. Shortly after returning to full power on February 26, 2021, the unit tripped due to inadvertent manipulation of generator output breaker protective relay controls by personnel performing maintenance evolutions in the Palo Verde switchyard. Unit 2 was restarted on February 28, 2021 and remained at or near full power for the remainder of the inspection period.

Unit 3 operated at or near full power for the duration of the inspection period.

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 telework 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

71111.04 - 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) Unit 1, high pressure safety injection B, on January 21, 2021
- (2) Unit 2, Class 1E 125Vdc batteries B and D during startup transformer NANX02 outage, on February 10, 2021
- (3) Unit 3, essential spray pond system B during planned maintenance on diesel generator A, on March 2, 2021

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (4 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) Unit 3, main turbine operating deck and main turbine bearings, Fire Zones TB9 and TB10, on February 10, 2021
- (2) Unit 1, Class 1E 4kV switchgear A, Fire Zone 5A, on March 11, 2021
- (3) Unit 2, Class 1E 4kV switchgear A, Fire Zone 5A, on March 11, 2021
- (4) Unit 3, high pressure safety injection pump A, Fire Zone 31A, on March 12, 2021

71111.06 - Flood Protection Measures

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

The inspectors evaluated internal flooding mitigation protections in the:

- (1) Unit 1, turbine driven auxiliary feedwater pump room, on January 2, 2021

Cable Degradation (IP Section 03.02) (1 Sample)

The inspectors evaluated cable submergence protection in:

- (1) Unit 3, diesel generator B fuel vault, on March 24, 2021

71111.11Q - Licensed Operator Regualification 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 Unit 2 reactor startup, on February 28, 2021.

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

- (1) The inspectors observed and evaluated operator requalification simulator training activities, on March 17, 2021.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components (SSCs) remain capable of performing their intended function:

- (1) Unit 1, safety injection system performance monitoring criteria exceeded due to safety injection tank vent valves SIA-608 and SIB-633 failing to close, on February 13, 2021
- (2) Unit 2, condition monitoring and maintenance plan for radwaste level transmitter failure, on February 13, 2021

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 1, repair of main steam isolation valve B thermal relief valve manifold assembly, on February 4, 2021
- (2) Unit 3, revised weekly risk assessment for extended diesel generator A outage from previous week displacing planned maintenance on high pressure safety injection pump A, on March 8, 2021
- (3) Unit 3, weekly risk assessment diesel generator, spray pond, essential cooling water, and essential chilled water planned maintenance, on March 28, 2021

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (5 Samples)

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

- (1) Unit 1, missed valve position indication test following maintenance for containment power access purge isolation valve, on February 17, 2021
- (2) Unit 1, main steam support structure door 1-CA01 locking mechanism malfunctioning, on March 11, 2021
- (3) Unit 3, diesel generator B sump pump failed to start, on March 12, 2021
- (4) Unit 1, 2, and 3, charging line containment isolation valve CH-560 limit switches may not provide reliable position indications during loss of cooling accident (LOCA) event submergence, on March 12, 2021
- (5) Unit 2, charging pump A missed vibration data gathering during surveillance testing, on March 30, 2021

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (3 Samples)

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

- (1) Unit 1, inspect and adjust Class 1E 480V Circuit Breaker 1EPHBM3607, on March 25, 2021
- (2) Unit 3, inspect and adjust Class 1E 480V Circuit Breaker 3EPHBM3810, on March 25, 2021
- (3) Unit 3, A diesel generator post-maintenance testing on replaced air start valves, on March 31, 2021

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated Unit 2 forced outage activities following reactor trip from February 26 to 28, 2021.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (2 Samples)

- (1) Unit 3, control element assembly operability check surveillance test risk informed documented evaluation for a one-time extension of frequency from every nine months to annually under the surveillance frequency control program, on January 12, 2021
- (2) Unit 1, observed engineered safety features actuation system train B relay testing (main steam isolation signal, recirculation actuation signal, containment isolation actuation signal), on March 15, 2021

Inservice Testing (IP Section 03.01) (1 Sample)

- (1) Unit 1, observed safety injection train B emergency core cooling system throttle valve inservice testing, on March 23, 2021

71114.01 - Exercise Evaluation

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

- (1) (Partial)
The inspectors evaluated the biennial emergency plan exercise which was conducted on March 9, 2021. However, as of the end of the 1st Quarter 2021, the licensee had not completed its critique process for the exercise. As such, the inspectors were unable to complete the full evaluation of the exercise and the critique process. The inspectors will complete the inspection early in the 2nd Quarter, and the results of the inspection will be documented in that report.

71114.04 - Emergency Action Level and Emergency Plan Changes

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

- (1) The inspectors evaluated the following recently submitted Emergency Action Level and Emergency Plan changes.
 - PVNGS Emergency Plan Revisions 67 and 68

This evaluation does not constitute NRC approval.

71114.08 - Exercise Evaluation Scenario Review

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

- (1) The inspectors reviewed the licensee's preliminary exercise scenario which was submitted to the NRC on December 18, 2020 (ADAMS Accession No. ML20353A421), for the exercise scheduled to occur on March 9, 2021. The inspectors discussed the preliminary scenario with Ms. C. Shields, Manager, Emergency Preparedness, and other members of the emergency preparedness staff on February 3, 2021. The inspectors' review does not constitute NRC approval of the scenario.

RADIATION SAFETY

71124.05 - Radiation Monitoring Instrumentation

Calibration and Testing Program (IP Section 03.02) (15 Samples)

The inspectors evaluated the calibration and testing of the following radiation detection instruments:

- (1) Eberline AMS 4, SN #112914, 08/05/2020
- (2) Econoair Plus L-12P Personal Air Sampler, SN #1741, 12/11/2020
- (3) Ludlum Model 3 Count Rate Meter, SN #231550, 07/08/2020
- (4) GM Probe, SN #13478, 12/04/2020
- (5) AMP-100, SM #5014035, 09/17/2020
- (6) RO-20 Meter, SN #1411, 09/09/2020
- (7) RO-7 Meter, SN #679, 10/24/2020
- (8) Neutron Detector, SN #110762, 10/30/2020
- (9) Air Sampler - Charcoal, SN #16456, 12/04/2020
- (10) Small Article Monitor (SAM) 12, SN #6700, 10/28/2020
- (11) Small Article Monitor (SAM) 12, SN #6710, 11/18/2020
- (12) ThermoFisher Scientific Personal Contamination Monitor (PM-12), SN #12018, 09/03/2020
- (13) ThermoFisher Scientific Personal Contamination Monitor (PM-12), SN #1213, 11/17/2020
- (14) ThermoFisher Scientific iPCM 12, SN #112021, 11/20/2020
- (15) ThermoFisher Scientific iPCM 12, SN #12019, 08/14/2020

Effluent Monitoring Calibration and Testing Program Sample (IP Sample 03.03) (3 Samples)

The inspectors evaluated the calibration and maintenance of the following radioactive effluent monitoring and measurement instrumentation:

- (1) RU-200, Radioactive Liquid Effluent Monitor
- (2) RU-144, Plant Vent Radiation Monitor High
- (3) RU-14, Radwaste Effluent Radiation Monitor

71124.08 - Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation

Waste Characterization and Classification (IP Section 03.03) (3 Samples)

The inspectors evaluated the licensee's characterization and classification for the following radioactive waste streams:

- (1) Unit 1 Resin Stream for 2020
- (2) Unit 2 Resin Stream for 2020
- (3) Unit 2 Dry Active Waste stream for 2020

Shipping Records (IP Section 03.05) (5 Samples)

The inspectors evaluated the following non-excepted radioactive material shipments through a record review:

- (1) 19-RW-018, LSA - II, Dewatered Resin
- (2) 19-RW-023, LSA - I, Concentrates
- (3) 20-RW-012, LSA - II, Dewatered Resin
- (4) 20-RW-031, LSA - II, Dewatered Resin
- (5) 20-RW-034, LSA - II, Dewatered Resin

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

IE01: Unplanned Scrams per 7000 Critical Hours Sample (IP Section 03.01) (3 Samples)

- (1) Unit 1, January 1, 2020 through December 31, 2020
- (2) Unit 2, January 1, 2020 through December 31, 2020
- (3) Unit 3, January 1, 2020 through December 31, 2020

IE03: Unplanned Power Changes per 7000 Critical Hours Sample (IP Section 03.02) (3 Samples)

- (1) Unit 1, January 1, 2020 through December 31, 2020
- (2) Unit 2, January 1, 2020 through December 31, 2020
- (3) Unit 3, January 1, 2020 through December 31, 2020

IE04: Unplanned Scrams with Complications (USwC) Sample (IP Section 03.03) (3 Samples)

- (1) Unit 1, January 1, 2020 through December 31, 2020
- (2) Unit 2, January 1, 2020 through December 31, 2020
- (3) Unit 3, January 1, 2020 through December 31, 2020

MS05: Safety System Functional Failures (SSFFs) Sample (IP Section 03.04) (3 Samples)

- (1) Unit 1, January 1, 2020 through December 31, 2020
- (2) Unit 2, January 1, 2020 through December 31, 2020
- (3) Unit 3, January 1, 2020 through December 31, 2020

EP01: Drill/Exercise Performance (IP Section 03.12) (1 Sample)

- (1) January 1, 2020 through December 31, 2020

EP02: ERO Drill Participation (IP Section 03.13) (1 Sample)

- (1) January 1, 2020 through December 31, 2020

EP03: Alert & Notification System Reliability (IP Section 03.14) (1 Sample)

- (1) January 1, 2020 through December 31, 2020

71153 - Followup of Events and Notices of Enforcement Discretion

Event Followup (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated Unit 2 automatic reactor trip and licensee's response on February 26, 2021.

INSPECTION RESULTS

Failure to Correctly Classify a Condition Adverse to Quality Associated with Turbine Driven Auxiliary Feed Water Pump			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000528, 05000529, 05000530/2021001-01 Open/Closed	[H.6] - Design Margins	71111.06
The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion V, for the licensee's failure to disposition a condition adverse to quality associated with safety-related cables in accordance with the licensee's condition reporting procedure. This has led to repeated water intrusion into Class 1E electrical conduits, which could degrade cabling and affect the reliability of the turbine driven auxiliary feedwater (AFW) pump.			
<u>Description:</u> On August 22, 2019, indication of water intrusion was found on a junction box and two electrical conduits that penetrate down through the 100 foot train A auxiliary feed pump room. The licensee identified deposits from previous water intrusion and corrosion on			

the bottom of the junction box around the junction box cover. The union on conduit 1EZCAEARK63, which transitions between an unlabeled junction box and another junction box 1EZCAEAKKJ17 (J17), also had signs of water leaking out of the fittings indicating that water had entered the conduit at some point in the past. The licensee screened this issue as not a condition adverse to quality, entered it into the Performance Monitoring Program, and assigned a corrective maintenance work order to correct the condition per condition report CR 19-10684.

Per step 4.5.2 of licensee procedure, 01DP-0AP12, "Condition Reporting Process," Revision 34 the screening committee classifies condition reports as either a significant condition adverse to quality, condition adverse to quality, or not a condition adverse to quality. This same procedure defines a condition adverse to quality as an all-inclusive term used in reference to failures, malfunctions, deficiencies, defective items, and non-conformances in items, activities, software and services that fall within the current licensing basis.

On January 1, 2021, the licensee observed water dripping from electrical conduit junction box J17 and after further evaluation determined that the source of water leakage was from main steam safety valves condensation overflow above which was spilling onto junction box 1EZC2EAKKJ04 (J04) at the 120 foot level. Per evaluation 21-00021-004, water flowed from junction box J04 down through the internal side of two electrical conduit penetrations into junction box J17 leaking into the AFW pump room. The main steam safety valve condensation is handled by a temporary drip catch which diverts the flow away from the junction box, however, in August 2019 and January 2021, that temporary drip catch had a clogged collection standpipe resulting in overflow onto junction box J04.

The inspectors concluded that the disposition on August 22, 2019, as not a condition adverse to quality was incorrect because safety-related power cables in this conduit provide electrical power to the turbine governor and valves associated with train A AFW pump, which is described in the current licensing basis. Therefore, continued water intrusion as observed on January 1, 2021, could degrade the electrical cabling and affect the reliability of the auxiliary feedwater system components.

The inspectors visually examined junction box J04 and it was apparent that water had been pooling on the roof of the junction box challenging the front side cover seal. Until the licensee corrects the configuration to prevent pooling on the top of the junction box, it will likely continue to leak into the cable conduit when wetted.

Corrective Actions: Per evaluation report 21-00013, junction boxes J17 and J04 will be inspected for drain holes if not already installed or inspected for drain hole-clogging if already installed.

Corrective Action References: Condition Reports 21-00013 and 21-03848

Performance Assessment:

Performance Deficiency: The licensee failed to correctly classify a condition adverse to quality in accordance with step 4.5.2 of licensee procedure, 01DP-0AP12, "Condition Reporting Process." Specifically, during the screening committee review of Condition Report 19-10684, the licensee classified water intrusion into safety-related junction boxes and electrical conduits related to Class 1E electrical cabling and turbine driven AFW pump train A as a condition not adverse to quality.

Screening: The inspectors determined the performance deficiency was more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, the performance deficiency resulted in repeated water intrusion into junction boxes and conduits which could degrade cabling and affect the reliability of the turbine driven AFW pump.

Significance: The inspectors assessed the significance of the finding using Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors assessed the significance of the finding using IMC 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, "Mitigating Systems Screening Questions." finding was determined to be of very low safety significance (Green) because it (1) was not a design deficiency, (2) did not represent a loss of system and/or function, (3) did not represent an actual loss of function of at least a single train for longer than its technical specification allowed outage time, (4) did not represent a loss of the probabilistic risk assessment (PRA) function of two separate technical specification systems for greater than 24 hours, (5) did not represent a loss of a PRA system and/or function for greater than 24 hours, and (6) did not result in the loss of a high safety-significant, nontechnical specification train.

Cross-Cutting Aspect: H.6 - Design Margins: The organization operates and maintains equipment within design margins. Margins are carefully guarded and changed only through a systematic and rigorous process. Specifically, when water intrusion into safety-related junction boxes and electrical conduits was found on August 22, 2019, the licensee failed to maintain safety-related equipment and incorrectly screened this issue as not a condition adverse to quality.

Enforcement:

Violation: 10 CFR 50 Appendix B, Criterion V, requires, in part, that activities affecting quality shall be accomplished in accordance with instructions, procedures or drawings. Procedure 01DP-0AP12, "Condition Reporting Process," Revision 34, step 4.5.2, requires that the licensee screening committee assigns the condition report an appropriate quality classification.

Contrary to the above, on August 22, 2019, the licensee failed to accomplish an activity affecting quality in accordance with instructions, procedures, or drawings. Specifically, during condition report screening, an activity that affects quality, the licensee failed to assign the correct level of classification to junction box water intrusion, which could affect the reliability of the turbine driven AFW pump, as a condition adverse to quality, in accordance with procedure 01DP-0AP12.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Unresolved Item (Open)	10 CFR Part 37 Requirements URI URI 05000528, 05000529, 05000530/2021001-02	71124.08
<p><u>Description:</u> The inspectors, while conducting a public radiation safety baseline inspection, identified numerous issues of concern regarding the implementation of 10 CFR Part 37 requirements during their review of the controls for an aggregated Category 2 quantity of radioactive material. The inspection was conducted the week of January 11, 2021, using IP 71124.08, “Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation.” The inspectors informed the licensee of the issues of concern regarding the implementation of the 10 CFR Part 37 requirements, specifically associated with 10 CFR 37.49(a)(3)(ii), 37.51(a), and 37.51(b).</p> <p>10 CFR 37.49(a)(3)(ii) requires, in part, for Category 2 quantities of radioactive material, that the licensee shall establish and maintain weekly verification through physical checks, tamper indicating devices, use, or other means to ensure that the radioactive material is present.</p> <p>10 CFR 37.51 requires, in part, (a) that the licensee shall implement a maintenance and testing program to ensure that intrusion alarms, associated communication systems, and other physical components of the systems used to secure or detect unauthorized access to radioactive material are maintained in operable condition and are capable of performing their intended function when needed; and (b) that the licensee shall maintain records on the maintenance and testing activities for 3 years.</p> <p>These issues of concern relative to the control of Category 2 radioactive material required additional information and review to determine whether the licensee performance constituted violations of NRC requirements. Consequently, we are considering this matter as an Unresolved Item (URI).</p> <p>Planned Closure Actions: The inspectors plan to continue their review of documentation provided by the licensee as it is made available, as well as hold discussions to resolve these issues of concern. This review will be a comprehensive assessment of all associated violations and/or findings related to these potential issues identified. The results of the final determination of these 10 CFR Part 37 violations, if validated, will be documented in a standalone report due to the security-related aspects of the potential violations.</p> <p>Licensee Actions: The licensee placed this matter into their corrective action program for review and implementation of corrective actions. The licensee used the corrective action program to document their corrective actions already taken and planned, as well as communicated them to the inspectors. Thus far, the licensee has been very responsive to the potential violations. The licensee has already addressed perceived gaps the inspectors identified in the implementation of 10 CFR Part 37 requirements.</p> <p>Corrective Action References: CR-21-03309</p>		

EXIT MEETINGS AND DEBRIEFS

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

- On February 4, 2021, the inspectors presented the Radiation Safety inspection results to Mrs. Maria Lacal, Site Vice President/Chief Nuclear Officer and other members of the licensee staff.
- On March 11, 2021, the inspectors presented the EP Performance Indicator Verification and Emergency Plan Changes inspection results to Mrs. Maria Lacal, Site Vice President/Chief Nuclear Officer and other members of the licensee staff.
- On April 7, 2021, the inspectors presented the integrated inspection results to Mrs. Maria Lacal, Site Vice President/Chief Nuclear Officer and other members of the licensee staff.
- On April 22, 2021, the inspectors discussed the integrated inspection results to Mr. Matt Kura, Department Leader, Nuclear Regulatory Affairs, and other members of the licensee staff.
- On April 28, 2021, the inspectors debriefed the 10 CFR Part 37 Requirements URI with Mr. Todd Horton, Senior Vice President, Site Operations.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Drawings	01-M-SIP-001	P& I Diagram Safety Injection & Shutdown Cooling System	062
71111.04	Drawings	01-M-SIP-002	P& I Diagram Safety Injection & Shutdown Cooling System	044
71111.04	Drawings	03-M-SPP-001	P& I Diagram Essential Spray Pond System	071
71111.04	Drawings	03-M-SPP-002	P& I Diagram Essential Spray Pond System	019
71111.05	Miscellaneous		PVGS Pre-Fire Strategies Manual	29
71111.05	Miscellaneous	USAR Section 9B	Fire Hazards Analysis	19
71111.06	Calculations	13-MC-ZA-0807	MSSS 100' Elevation Flooding Evaluation	4
71111.06	Calculations	13-MC-ZA-0808	MSSS 81' Elevation Flooding Evaluation	7
71111.06	Corrective Action Documents	Condition Reports	21-00013, 21-00016, 21-00021, 20-03848, 20-16841, 19-10684	
71111.11Q	Miscellaneous	NLR21S020201	Licensed Operator Training Simulator Scenario: LOCA / Loss of Class Instrument / Rapid Downpower	02/24/2021
71111.12	Corrective Action Documents	Condition Reports	20-15752, 20-15757, 20-15943, 20-15954, 20-16314	
71111.12	Miscellaneous	20-15752-003	MRFF Evaluation	
71111.12	Miscellaneous	20-15752-004	Level 3 Evaluation Report	
71111.12	Miscellaneous	20-15757-003	MRFF Evaluation	
71111.12	Miscellaneous	20-15757-004	Level 3 Evaluation Report	
71111.12	Miscellaneous	Level 3 Evaluation Report	Maintenance Rule Expert Panel Meeting 633	02/04/2021
71111.12	Miscellaneous	SI-2503	Maintenance Rule (a)(1) Issue Tracking Form	0
71111.12	Procedures	70DP-0MR01	Maintenance Rule	46
71111.13	Corrective Action Documents	Condition Reports	21-00853	
71111.13	Miscellaneous		U1 MSIV RICT Projection Details	02/04/2021
71111.13	Miscellaneous		U1 MSIV Risk Management and Readiness Plan	02/03/2021
71111.13	Miscellaneous	EOOS 4.1	Weekly Scheduler's Evaluation for PV Unit 3 Mar 8-14	02/17/2021, 03/8/2021
71111.13	Miscellaneous	EOOS 4.1	Weekly Scheduler's Evaluation for PV Unit 3 Mar 22-28	03/25/2021
71111.13	Miscellaneous	Phoenix Risk Monitor	WW 2112 Schedule Evaluation (3/22-28/2021)	03/23/2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.13	Miscellaneous	Phoenix Risk Monitor	WW 2110 Schedule Evaluation (3/8-14/2021)	02/17/2021, 03/8/2021
71111.13	Miscellaneous	RICT-U1-2021-01	Risk Informed Completion Time Summary	02/04/2021
71111.13	Miscellaneous	Risk Challenge Meeting	Risk Challenge Meeting for U1 MSIV-171 Repair	02/03/2021
71111.13	Procedures	02DP-0RS01	Online Integrated Risk	9
71111.13	Procedures	40DP-9RS01	Operations Department Online Nuclear Risk Determination in Modes 1 and 2	7
71111.13	Procedures	40DP-9RS03	Risk Management Actions	1
71111.13	Work Orders		5310300	
71111.15	Corrective Action Documents	Condition Reports	21-01818, 21-02855, 21-02888	
71111.15	Miscellaneous		Updated Final Safety Analysis Report	20B
71111.15	Miscellaneous	21-01818-002	Engineering Evaluation	
71111.15	Miscellaneous	EEQ-N007-001	Namco EA180 Limit Switches	23
71111.15	Procedures	40DP-9OP26	Operations Condition Reporting Process and Operability	47
71111.15	Procedures	40DP-9ZZ17	Control of Doors, Hatches, and Floor Plugs	65
71111.15	Procedures	73ST-9XI15	CP (Power Access Purge) Valves – Inservice Test	11
71111.15	Work Orders		5159840	
71111.19	Procedures	32MT-9ZZ74	Molded Case Circuit Breaker Test	53
71111.19	Work Orders		5062359, 5202497	
71111.22	Miscellaneous	Plant Review Board	STRIDE PRB Approval Meeting for CEA Operability Checks	01/12/2021
71111.22	Procedures	01DP-0RS01	Surveillance Frequency Control Program	1
71111.22	Procedures	01DP-0RS02	Surveillance Test Risk Informed Documented Evaluation (STRIDE) Process	3
71111.22	Procedures	70DP-0RA06	PRA Methodology for Evaluating Changes to Surveillance Test Intervals	2
71111.22	Procedures	PVN-N-0034	STRIDE for One-Time Change for DEA Operability Checks	0
71114.01	Corrective Action Documents	Condition Reports	19-03672, 19-03691, 19-05088, 19-08356, 19-13385, 19-13930, 19-17244, 20-01446, 20-01527, 20-03432, 20-03738, 20-04408, 20-04999, 20-14892, 20-15325, 20-15510, 20-16537, 20-16863	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71114.01	Miscellaneous	102-05627	Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3; Docket No. STN 50-528; 50-529; 50-530 and 72-44; License No. NPF-41; NPF-51; NPF-74; Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	01/11/2007
71114.01	Procedures	16DP-0EP31	Emergency Preparedness Equipment Out of Service	12
71114.01	Procedures	40AO-9ZZ23	Loss of SFP Level or Cooling	31
71114.01	Procedures	40AO-9ZZ24	Deliberate Acts Against PVNGS	32
71114.01	Procedures	40MG-9ZZ05	Extensive Damage Mitigation Guidelines	0
71114.01	Procedures	40MG-9ZZ05-001	EDMG Command and Control	0
71114.01	Procedures	40MG-9ZZ05-002	Mitigating Guidelines Supplemental Strategies	0
71114.01	Procedures	40MG-9ZZ07	FLEX Support Guidelines	0
71114.01	Procedures	40MG-9ZZ07-001	FLEX Support Guidelines, Modes 1, 2, 3, or 4	0
71114.01	Procedures	EP-0900	Emergency Response Organization (ERO) Position Checklists	20
71114.01	Procedures	EP-0901	Classifications	14
71114.01	Procedures	EP-0905	Protective Actions	10
71114.04	Miscellaneous		PVNGS Emergency Plan	67, 68
71114.04	Miscellaneous		Emergency Plan Evaluation - Medical Support During a Public Health Emergency	12/17/2020
71114.04	Miscellaneous	2020-001e	Emergency Plan Revision 67 Effectiveness Evaluation Form	05/05/2020
71114.04	Miscellaneous	2020-002s	Transitioning the Operations Advisor - STSC position to a pooled position Screening Evaluation Form	03/17/2020
71114.04	Miscellaneous	2020-003e	Emergency Plan Revision 68 Effectiveness Evaluation Form	12/16/2020
71114.04	Miscellaneous	2020-003e, Revision 1	Emergency Plan Revision 68 Effectiveness Evaluation Form	12/16/2020
71114.04	Miscellaneous	2020-003s	Emergency Plan Revision 67 Screening Evaluation Form	05/01/2020
71114.04	Miscellaneous	2020-004s	Emergency Plan Revision 68 Screening Evaluation Form	07/30/2020
71114.04	Miscellaneous	2020-005s	Update to the Palo Verde Emergency Planning Zone (EPZ) population Screening Evaluation Form	12/10/2020
71114.08	Miscellaneous		1904 ERO Mini Drill - ERO Green Team (June 4, 2019); 1905 ERO Mini Drill - ERO Blue Team (June 11, 2019); 1906 ERO Mini Drill - ERO Red Team (June 18, 2019)	10/29/2019
71114.08	Miscellaneous		1907 ERO Mini Drill - ERO Red Team (September 10,	10/23/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			2019); 1909 ERO Mini Drill - ERO Green Team (September 24, 2019)	
71114.08	Miscellaneous		1910 ERO Mini Drill Report - ERO White Team (December 10, 2019)	01/2/2020
71114.08	Miscellaneous	240-02859 CS/SW	1901 Full-Scale Dress Rehearsal - ERO Gold Team (February 2019)	06/13/2019
71114.08	Procedures	EP-0905	Protective Actions	10
71124.05	Calibration Records	WO 04908361	RU-143 Plant Ventilation Monitor, Low Range - Unit 3	02/19/2019
71124.05	Calibration Records	WO 05091219	RU-143 Plant Ventilation Monitor, Low Range - Unit 3	06/25/2020
71124.05	Calibration Records	WO 4904815	RU-143 Plant Ventilation Monitor, Low Range - Unit 2	01/03/2019
71124.05	Calibration Records	WO 4906938	RU-143 Plant Ventilation Monitor, Low Range - Unit 1	01/03/2019
71124.05	Calibration Records	WO 4925134	RU-14 Radwaste Building Ventilation Exhaust Monitor - Unit 3	04/27/2018
71124.05	Calibration Records	WO 4981791	RU-14 Radwaste Building Ventilation Exhaust Monitor - Unit 3	12/12/2019
71124.05	Calibration Records	WO 4981791	RU-14 Radwaste Building Ventilation Exhaust Monitor - Unit 3	12/12/2019
71124.05	Calibration Records	WO 5005338	RU-14 Radwaste Building Ventilation Exhaust Monitor - Unit 2	05/01/2020
71124.05	Calibration Records	WO 5027206	RU-151 Radiation Monitor	10/26/2019
71124.05	Calibration Records	WO 5027531	RU-141 Radiation Monitor	11/18/2019
71124.05	Calibration Records	WO 5037715	RU-30 Radiation Monitor	11/12/2019
71124.05	Calibration Records	WO 5074919	RU-157 Radiation Monitor	02/27/2020
71124.05	Calibration Records	WO 5081319	RU-143 Plant Ventilation Monitor, Low Range - Unit 2	06/19/2020
71124.05	Calibration	WO 5085209	RU-143 Plant Ventilation Monitor, Low Range - Unit 1	06/22/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Records			
71124.05	Calibration Records	WO 5086713	RU-150 Radiation Monitor	04/09/2020
71124.05	Calibration Records	WO 5111166	RU-145 Fuel Building B Ventilation Exhaust Monitor, Low Range – Unit 3	07/15/2020
71124.05	Calibration Records	WO 5111180	RU-146 Fuel Building B Ventilation Exhaust Monitor, High Range – Unit 3	10/16/2020
71124.05	Calibration Records	WO 5145645	RU-15 Waste Gas Area Combined Ventilation Exhaust Monitor – Unit 1	09/22/2020
71124.05	Calibration Records	WO 5151446	RU-1 Radiation Monitor	11/07/2020
71124.05	Calibration Records	WO 5151451	RU-148 Radiation Monitor	11/12/2020
71124.05	Corrective Action Documents	Condition Reports	19-00740, 19-01086, 19-02060, 19-02467, 19-02886, 19-03691, 19-05830, 19-06030, 19-06237, 19-08355, 19-08808, 19-12890, 19-13509, 19-13899, 19-16388, 19-17175, 19-17244, 19-18312, 20-00153, 20-00391, 20-00576, 20-01188, 20-02588, 20-04408, 20-04707, 20-04730, 20-07625, 20-08012, 20-08563, 20-09920, 20-12560, 20-12803, 20-13297, 20-15324, 20-15678, 20-16032	
71124.05	Miscellaneous		2018 Annual Radioactive Effluent Release Report	04/16/2019
71124.05	Miscellaneous		2019 Annual Radioactive Effluent Release Report	04/17/2020
71124.05	Miscellaneous		Offsite Dose Calculation Manual PVNGS Units 1, 2, and 3	29
71124.05	Miscellaneous		Portal Monitors (PM) and Personal Contamination Monitors (PCM) Alarm Setpoints	01/05/2021
71124.05	Miscellaneous		Instrument Calibration Data Point Sheet	10/18/2020
71124.05	Miscellaneous		Unit 1 2019-2020 Inoperable Effluent Monitor Logs	12/31/2020
71124.05	Miscellaneous		Unit 2 2019-2020 Inoperable Effluent Monitor Logs	12/31/2020
71124.05	Miscellaneous		Unit 3 2019-2020 Inoperable Effluent Monitor Logs	12/31/2020
71124.05	Miscellaneous	Special Report 1-SR-2019-001-00	Palo Verde Nuclear Generating Station (PVNGS) Unit 1, Docket No. STN 50-528 /License No. NPF 51, Special Report 1-SR-2019-001-00: Non-functionality of a fuel	04/26/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			building ventilation system high range radioactive gaseous effluent monitor for more than 7 days	
71124.05	Procedures	74DP-0CH02	Analytical Instrument Quality Control (QC)	47
71124.05	Procedures	74RM-9EF43	Actions For Non-Functional Radiation Monitors: Preplanned Alternate Sampling Program	17
71124.05	Procedures	74ST-9SQ10	Train "A" Radiation Monitoring Quarterly Functional Test Procedure	5
71124.05	Procedures	74ST-9SQ20	RU-1 Calibration Test	18
71124.05	Procedures	74ST-9SQ21	Radiation Monitoring Calibration Test for Baseline Process Monitors	21
71124.05	Procedures	74ST-9SQ22	Train "A" Radiation Monitoring Calibration Test for Baseline Area Monitors	12
71124.05	Procedures	74ST-9SQ23	Train "A" Radiation Monitoring Calibration Test for Containment New Scope Area Monitors	21
71124.05	Procedures	74ST-9SQ27	Radiation Monitoring Calibration Test for RU-144	21
71124.05	Procedures	75RP-9EQ13	Canberra Whole Body Counting System Calibration	6
71124.05	Procedures	75RP-9EQ22	Calibration of Counter Scalers	6
71124.05	Procedures	75RP-9EQ56	Calibration of the RO-2 and RO-20A Ion Chambers	1
71124.05	Procedures	75RP-9ME20	Canberra APEX - In Vivo Whole Body Counting System Calibration	2
71124.05	Self-Assessments	IPA-RP2020S1	Integrated Performance Assessment Report: Radiation Protection - 1st Half 2020 (07/24/2020)	09/02/2020
71124.05	Self-Assessments	SR-20-0021	NAD Surveillance Report: 2020 Radiation Safety Performance Evaluation	07/23/2020
71124.05	Work Orders	5010217	74ST9SQ042 Effluent Monitor Monthly Source Checks Unit 2: RU-143/RU-144 Plant Vent Gaseous Effluent Monitor and RU-145/RU-146 Fuel Building Ventilation Gaseous Effluent Monitor	08/15/2019
71124.05	Work Orders	5010218	74ST9SQ043 Effluent Monitor Monthly Source Checks Unit 3: RU-143/RU-144 Plant Vent Gaseous Effluent Monitor and RU-145/RU-146 Fuel Building Ventilation Gaseous Effluent Monitor	08/15/2019
71124.05	Work Orders	5011137	74ST9SQ041 Effluent Monitor Monthly Source Checks Unit 1: RU-143/RU-144 Plant Vent Gaseous Effluent Monitor and	08/15/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			RU-145/RU-146 Fuel Building Ventilation Gaseous Effluent Monitor	
71124.05	Work Orders	5030412	74ST9SQ042 Effluent Monitor Monthly Source Checks Unit 2: RU-143/RU-144 Plant Vent Gaseous Effluent Monitor and RU-145/RU-146 Fuel Building Ventilation Gaseous Effluent Monitor	10/17/2019
71124.05	Work Orders	5030413	74ST9SQ043 Effluent Monitor Monthly Source Checks Unit 3: RU-143/RU-144 Plant Vent Gaseous Effluent Monitor and RU-145/RU-146 Fuel Building Ventilation Gaseous Effluent Monitor	10/21/2019
71124.05	Work Orders	5031145	74ST9SQ041 Effluent Monitor Monthly Source Checks Unit 1: RU-143/RU-144 Plant Vent Gaseous Effluent Monitor and RU-145/RU-146 Fuel Building Ventilation Gaseous Effluent Monitor	10/17/2019
71124.08	Corrective Action Documents	Condition Reports	19-02590, 19-07431, 19-11705, 19-18567, 20-02759, 20-02763, 20-14858	
71124.08	Miscellaneous		December 2020 Radwaste Inventory	12/2/2020
71124.08	Miscellaneous		Waste /Material Characteristic Summary for Part 61 Waste Stream Analysis - Unit 1 DAW - 2020	12/17/2020
71124.08	Miscellaneous		Waste /Material Characteristic Summary for Part 61 Waste Stream Analysis - Unit 1 DAW - 2020	12/17/2020
71124.08	Miscellaneous		Waste /Material Characteristic Summary for Part 61 Waste Stream Analysis - Unit 2 DAW -2020	05/12/2020
71124.08	Miscellaneous		Waste /Material Characteristic Summary for Part 61 Waste Stream Analysis - Unit 1 Resin - 2020	05/14/2020
71124.08	Miscellaneous		Waste /Material Characteristic Summary for Part 61 Waste Stream Analysis - Unit 2 Resin - 2020	12/09/2020
71124.08	Miscellaneous	75ST-9ZZ02	Radioactive Source Leak Test Surveillance Sheet	01/26/2020
71124.08	Miscellaneous	75ST-9ZZ02	Radioactive Source Leak Test Surveillance Sheet	01/15/2019
71124.08	Procedures	20DP-0SK77	Security Miscellaneous Testing	1
71124.08	Procedures	75RP-9RP09	Control of Vehicles, Equipment and Material	45
71124.08	Procedures	75RP-9RP15	Control and Storage of Radioactive Material and Radioactive Wastes	31
71124.08	Procedures	76DP-0AP12	Low Level Radioactive Material Storage Facility Overview	3

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71124.08	Procedures	76DP-0RP02	Radioactive Waste Minimization Program Overview	6
71124.08	Procedures	76DP-0RP03	Radwaste Process Control Program	9
71124.08	Procedures	76DP-0RP05	Radwaste Control and Management Activities	3
71124.08	Procedures	76RP-0RW05	Packaging and Classification of Radioactive Waste	6
71124.08	Procedures	76RP-0RW06	Packaging of Radioactive Material	5
71124.08	Procedures	76RP-0RW07	Shipping Radioactive Materials	16
71124.08	Procedures	76RP-0RW08	High Integrity Container Receipt, Handling, Use, and Closure	4
71124.08	Shipping Records	19-RW-018	Shipping paperwork package for the LSA-II dewatered resin shipment	
71124.08	Shipping Records	19-RW-023	Shipping paperwork package for the LSA-I concentrates shipment	
71124.08	Shipping Records	20-RW-012	Shipping paperwork package for the LSA-II dewatered resin shipment	
71124.08	Shipping Records	20-RW-031	Shipping paperwork package for the LSA-II dewatered resin shipment	
71124.08	Shipping Records	20-RW-034	Shipping paperwork package for the LSA-II dewatered resin shipment	
71151	Corrective Action Documents	Condition Reports	20-01508, 20-01734, 20-07606, 20-08679	
71151	Miscellaneous		NRC Performance Indicator Data; Emergency Preparedness – Drill/Exercise Performance; 1st Quarter 2020 – 4th Quarter 2020	01/01/2020 – 12/31/2020
71151	Miscellaneous		NRC Performance Indicator Data; Emergency Preparedness – ERO Readiness 1st Quarter 2020 – 4th Quarter 2020	01/01/2020 – 12/31/2020
71151	Miscellaneous		NRC Performance Indicator Data; Emergency Preparedness – Alert and Notification System Reliability; 1st Quarter 2020 – 4th Quarter 2020	01/01/2020 – 12/31/2020
71153	Corrective Action Documents	Condition Reports	21-02209	