

Corrective Action Plan

September 30, 2021

Corrective Actions Required Prior to Reactor Startup

SEC report reference	Corrective action	Comments/timing (2021)
QT-CA-1, IE-CA-6 Proficiency Training	Required training for all Operations Personnel	40 hours, starting October, ending December
MS-CA-5, QT-CA-2, QT-CA-3 Fuel movement training and qualifications	Fuel handling training program, qualification clearly spelled out; proficiency in fuel movements and latching demonstrated and documented for operators and supervisors	September - November
PR-CA-1: Fuel movement procedure details	Rewrite OI 6.1 and OI 6.2 to capture details of fuel movements and latching	OI revisions in progress.
PR-CA-2: Latch checks prior to final pump restart	Rewrite OI 2.1 and OI 1.1A CL to include a requirement that latch checks be done prior to the final pump restart.	OI revisions in progress.
PR-CA-3, IE-CA-1: Institute method of visual checks.	Visual check system completed and operational; OI 6.1 modified to include visual check.	Design complete, testing in progress. October implementation.
PR-CA-4: Independent latch check	OI 6.1 modified to require a second individual do an independent rotational latch check prior to final visual check.	OI revisions in progress.
MS-CA-6, PR-CA-5: Procedure adherence training	Provide required training on procedure adherence for all ROE, oversight for supervisors.	Complete.
QT-CA-5, MS-SPI-6, PR-SPI-1 Qualification consistency	Establish standard for operator and supervisor qualification	September - November
PR-CA-6: Revise procedures to be consistent with INPO 11-003.	Identify procedures necessary prior to reactor restart; provide training on procedure protocols; revise identified procedures.	All hands effort, start September. Training complete.
IE-CA-2 Document defense of improved latching and latch check processes.	Analysis and justification of improvement in latching and latch checks.	Complete. See Latch Improvement Safety Analysis.

IE-CA-3 Modify index plate	Corrections to positioning and fiduciary marks	Evaluation in progress. May have temporary corrections if manufacturing is longer term solution.
IE-CA-4 Height check determination	Determine advisability of continuing height checks	Complete. Current equipment does not support height checks with sufficient resolution, so latch checks are no longer prescribed.
IE-CA-5 No tool contact following latch verification	Modify OI 6.1 and OI 1.1A CL to assure no tool contact will be made with the fuel head after the final visual latch verification.	OI revisions in progress.