UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

January 30, 2022

Mr. G. T. Powell
President and CEO
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION, UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT 05000498/2021004 AND 05000499/2021004

Dear Mr. Powell:

On December 31, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at South Texas Project Electric Generating Station, Units 1 and 2. On January 6, 2022, the NRC inspectors discussed the results of this inspection with Kym Harshaw, Chief Nuclear Officer, and other members of your staff. The results of this inspection are documented in the enclosed report.

Three findings of very low safety significance (Green) are documented in this report. Three of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations 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 South Texas Project Electric Generating Station, Units 1 and 2.

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 South Texas Project Electric Generating Station, Units 1 and 2.

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,

Signed by Kozal, Jason
on 01/30/22

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

Docket Nos. 05000498 and 05000499
License Nos. NPF-76 and NPF-80

Enclosure:
As stated

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SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION, UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT 05000498/2021004 AND 05000499/2021004 – DATED JANUARY 30, 2022

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000498 and 05000499
License Numbers:	NPF-76 and NPF-80
Report Numbers:	05000498/2021004 and 05000499/2021004
Enterprise Identifier:	I-2021-004-0116
Licensee:	STP Nuclear Operating Company
Facility:	South Texas Project Electric Generating Station, Units 1 and 2
Location:	Wadsworth, TX 77483
Inspection Dates:	October 1, 2021 to December 31, 2021
Inspectors:	R. Fanner, Operations Engineer S. Hedger, Sr Emergency Preparedness Inspector N. Hernandez, Operations Engineer G. Kolcum, Senior Resident Inspector W. Sifre, Senior Reactor Inspector C. Stott, Resident Inspector D. You, Operations Engineer
Approved By:	Jason W. Kozal, Chief Reactor Projects Branch A 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 South Texas Project Electric Generating Station, Units 1 and 2, 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 Implement Adequate Maintenance Procedures			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000498,05000499/2021004-01 Open/Closed	[H.7] - Documentation	71111.15
The inspectors identified a Green finding and associated non-cited violation (NCV) of Technical Specification 6.8.1.a, for the licensee's failure to provide an adequate maintenance procedure to install the essential cooling water (ECW) strainer motor to speed reducer coupling as required in Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, Appendix A, section 9, "Procedures for Performing Maintenance." Specifically, the licensee failed to ensure set screws for the ECW strainer motor to speed reducer coupling were properly torqued.			

Failure to Demonstrate Control of Pressurizer Power Operated Relief Valve Performance Under the Maintenance Rule			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000498,05000499/2021004-02 Open/Closed	None	71111.19
The inspectors identified a Green, non-cited violation of 10 CFR 50.65(a)(2), for failure to demonstrate effective control of performance of a maintenance rule scoped system through appropriate preventive maintenance. Specifically, the licensee failed to create and schedule regular preventive maintenance actions to inspect or replace parts for the Unit 1 pressurizer power operated relief valve (PORV) 656A.			

Failure to Demonstrate Control of Performance Under the Maintenance Rule			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000498,05000499/2021004-03 Open/Closed	None	71152
The inspectors identified a Green, non-cited violation of 10 CFR 50.65(a)(2), for failure to demonstrate effective control of performance of a maintenance rule scoped system through appropriate preventive maintenance. Specifically, the licensee failed to create adequate preventive maintenance actions to inspect the auxiliary contacts in the control room hand switch for the high head safety injection (HHSI) pump 2B that automatically starts the associated room cooler fans.			

Additional Tracking Items

None.

PLANT STATUS

Unit 1 began the inspection period at rated thermal power and commenced a reactor shutdown on October 8, 2021, to begin refueling outage 1RE23. The main generator breaker was closed on November 7, 2021, ending the refueling outage. Unit 1 reached rated thermal power on November 9, 2021, and remained there for the rest of the period.

Unit 2 began the inspection period at rated thermal power and on November 20, 2021, lowered power level to 90 percent for main turbine steam inlet valve testing. Unit 2 returned to 100 percent power on November 21, 2021, and remained there for the rest of the 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 activities described in IMC 2515, Appendix D, "Plant Status," conducted routine reviews using IP 71152, "Problem Identification and Resolution," observed risk significant activities, and completed on-site portions of IPs. 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.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

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

(1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of cold weather the week of December 20, 2021 for the following systems:

Units 1 and 2 emergency diesel generators
Units 1 and 2 main feedwater pumps

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (6 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 1, essential chillers and component cooling pump rooms on October 4, 2021
(2) Unit 2, essential chillers and component cooling pump rooms on October 4, 2021
(3) Unit 1, reactor containment building on October 9, 2021
(4) Unit 2, FLEX diesel generator enclosure on October 19, 2021
(5) Unit 1, auxiliary shutdown panel area on October 22, 2021

(6) Unit 1, FLEX diesel generator enclosure on December 14, 2021

Fire Brigade Drill Performance Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the onsite fire brigade performance during a simulated fire in the lighting diesel generator building on November 17, 2021.

71111.07A - Heat Sink Performance

Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

(1) Unit 1, train B residual heat removal heat exchanger on October 11, 2021

71111.08P - Inservice Inspection Activities (PWR)

PWR Inservice Inspection Activities Sample (IP Section 03.01) (1 Sample)

(1) The inspectors verified that the reactor coolant system boundary, steam generator tubes, reactor vessel internals, risk-significant piping system boundaries, and containment boundary are appropriately monitored for degradation and that repairs and replacements were appropriately fabricated, examined and accepted by reviewing the following activities from October 12, 2021 to October 20, 2021:

03.01.a - Nondestructive Examination and Welding Activities.

- Pressurizer Weld PRZ-1-N4A, Relief Nozzle to Shell - Ultrasonic
- Reactor Coolant 12-RC-1221-BB1 Weld 9, Pipe to Elbow - Ultrasonic
- Reactor Coolant 12-RC-1221-BB1 Weld 11, Pipe to Pipe - Ultrasonic
- Reactor Coolant 12-RC-1221-BB1 Weld 13, Elbow to Pipe - Ultrasonic
- C Train Safety Injection 12-SI-1315 BB1 Weld, Pipe to Pipe - Ultrasonic
- 1-RH-00032A Valve to Pipe / 8-RH-1108-BB1 Weld 1 - Ultrasonic
- 1-RH-00032A Pipe to Valve / 8-RH-1107-BB2 Weld 2 - Ultrasonic
- Containment Leak Chase System (0 to 90 Degrees) - Visual
- 1-RH-00032A Low Head Safety Injection Train A to Loop 1A Cold Leg Check Valve - Dye Penetrant
- 1-RH-00032A Low Head Safety Injection Train A to Loop 1A Cold Leg Check Valve - Radiography
- FW0001 – RH0032A Pipe to Valve - Gas Tungsten Arc Weld
- FW0002 – RH0032A Valve to Pipe - Gas Tungsten Arc Weld

03.01.c – Pressurized-Water Reactor Boric Acid Corrosion Control Activities.

The inspector reviewed the following documents associated with boric acid leaks and evaluations

- Condition Reports: 2021-10504, 2021-10572, 2021-10490, 2021-10497, 2021-10472, 2021-10565, 2021-10567, 2021-10509, 2021-10354, 2021-10422, 2021-10424, 2021-10428, 2021-10415, 2021-10417, 2021-10419, 2021-10420, 2021-10131

Problem Identification and Resolution

- The inspector reviewed 55 condition reports associated with inservice and operating experience issues.

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

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

(1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam administered on December 17, 2021.

71111.11B - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Requalification Program (IP Section 03.04) (1 Sample)

(1) Biennial Requalification Written Examinations

The inspectors evaluated the quality of the licensed operator biennial requalification written examination administered on December 20, 2021.

Annual Requalification Operating Tests

The inspectors evaluated the adequacy of the facility licensee's annual requalification operating test.

Administration of an Annual Requalification Operating Test

The inspectors evaluated the effectiveness of the facility licensee in administering requalification operating tests required by 10 CFR 55.59(a)(2) and that the facility licensee is effectively evaluating their licensed operators for mastery of training objectives.

Requalification Examination Security

The inspectors evaluated the ability of the facility licensee to safeguard examination material, such that the examination is not compromised.

Remedial Training and Re-examinations

The inspectors evaluated the effectiveness of remedial training conducted by the licensee, and reviewed the adequacy of re-examinations for licensed operators who did not pass a required requalification examination.

Operator License Conditions

The inspectors evaluated the licensee's program for ensuring that licensed operators meet the conditions of their licenses.

Control Room Simulator

The inspectors evaluated the adequacy of the facility licensee's control room simulator in modeling the actual plant, and for meeting the requirements contained in 10 CFR 55.46.

Problem Identification and Resolution

The inspectors evaluated the licensee's ability to identify and resolve problems associated with licensed operator performance.

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 Unit 1 downpower and shutdown for refueling outage on October 8, 2021.

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

(1) The inspectors observed and evaluated licensed operators in shutdown and solid plant operations training scenarios on October 6, 2021.

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (1 Sample)

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, white risk for routine maintenance on train B residual heat removal system and reactor containment fan coolers during the week of November 8, 2021

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (1 Sample)

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

(1) Units 1 and 2, essential cooling water strainer motor to speed reducer setscrews on December 9, 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, intermediate range NI-35 hi-volt fail on October 6, 2021
(2) Unit 1, train A residual heat removal injection check valve on October 22, 2021
(3) Unit 1, power operated relief valve 656A repaired after valve found with excessive leak by and tested on November 3, 2021

71111.20 - Refueling and Other Outage Activities

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

(1) The inspectors evaluated Unit 1, refueling outage 1RE23 that commenced on October 8, 2021, and completed on November 7, 2021.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (3 Samples)

(1) Unit 1, reactor coolant system subcooling monitor calibration on October 18, 2021
(2) Unit 1, reactor coolant system extended range pressure set 4 loop calibration on October 18, 2021
(3) Unit 1, train D auxiliary feedwater pump on November 4, 2021

Containment Isolation Valve Testing (IP Section 03.01) (1 Sample)

(1) Unit 1, M-43 penetration local leak rate testing for containment supplementary purge line on October 16, 2021

71114.01 - Exercise Evaluation

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

(1) On December 1, 2021, the inspectors evaluated an emergency plan drill demonstrating the station's extensive damage mitigation guideline strategies per the requirements of 10 CFR 50.155(b)(2). A portion of the strategies were demonstrated for one of the emergency response facilities associated with the biennial exercise on July 29, 2021. Other facilities involved in implementation did not demonstrate any of the strategies on that date. Therefore, the December 1, 2021 drill was conducted to evaluate their capabilities in the other facilities.

71114.06 - Drill Evaluation

Select Emergency Preparedness Drills and/or Training for Observation (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated the licensee's drill that involved a large break loss of coolant accident and Alert, Site Area, and General Emergency notifications on September 30, 2021.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

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

(1) Unit 1, October 1, 2020, through September 30, 2021
(2) Unit 2, October 1, 2020, through September 30, 2021

MS10: Cooling Water Support Systems (IP Section 02.09) (2 Samples)

(1) Unit 1, October 1, 2020, through September 30, 2021
(2) Unit 2, October 1, 2020, through September 30, 2021

71152 - Problem Identification and Resolution (PI&R)

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

(1) The inspectors reviewed the licensee's corrective action program for potential adverse trends in fire protection program that might be indicative of a more significant safety issue.

Annual Follow-up of Selected Issues (IP Section 02.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

(1) Unit 2, train B high head safety injection pump hand switch failed to start the emergency core cooling system room cooling fans on October 15, 2021

INSPECTION RESULTS

Failure to Implement Adequate Maintenance Procedures			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000498,05000499/2021004-01 Open/Closed	[H.7] - Documentation	71111.15
The inspectors identified a Green finding and associated non-cited violation (NCV) of Technical Specification 6.8.1.a, for the licensee's failure to provide an adequate maintenance procedure to install the essential cooling water (ECW) strainer motor to speed reducer coupling as required in Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, Appendix A, section 9, "Procedures for Performing Maintenance." Specifically, the licensee failed to ensure set screws for the ECW strainer motor to speed reducer coupling were properly torqued.			
Description: On September 23, 2021, the licensee discovered the self-cleaning strainer in train B of ECW for Unit 2 was not rotating with the motor running. Each Unit has three trains of ECW designated as train A, train B, and train C. The strainer motor starts automatically with associated ECW pump to remove particulate matter greater than 1/16" from essential			

cooling water to prevent fouling of safety-related heat exchangers. The strainer is required to function during all modes of ECW operation and is continuously backwashing to prevent clogging of screens. The ECW Self Cleaning Strainer has a motor which connects to a reducer via hub coupling to rotate the strainer. The hub coupling is a Lovejoy model L-095. In work activity number (WAN) 659898, the licensee recorded finding loose set screws for the strainer motor to speed reducer coupling. The licensee tightened the set screws in WAN 659898 without the use of a torque wrench or torque values for the set screws.

The inspectors questioned the licensee and determined that the set crews were tightened without the use of a calibrated torque wrench. The vendor technical manual, Lovejoy Couplings Jaw Type, VTD-L253-0002, Revision 1, states on page 30 of the Installation Guide, that "correct installation and alignment practices will ensure longer coupling life, trouble free operation, and a safer operating environment for the coupling. Please thoroughly review all of the following instructions prior to installing the coupling and placing it in operation." The vendor technical manual recommends the use of a calibrated torque wrench and provides a table to identify the recommended tightening torque value for installing the set screws. The licensee did not have any torque values in the associated preventive maintenance procedures.

The licensee found this same failure had occurred on December 8, 2012, on train A of ECW for Unit 1. In WAN 464256, the licensee recorded that they corrected the issue by tightening the set screws of the affected self-cleaning strainer and closed associated condition report CR 12-31542. The licensee failed to incorporate any steps within preventive maintenance documents to ensure tightness checks were routinely performed with proper torque.

Corrective Actions: The licensee created work orders to complete ECW strainer motor to speed reducer set screw tightness checks on the remaining trains of ECW along with incorporating proper torque value into applicable preventive maintenance procedures.

Corrective Action References: CR 2021-9789

Performance Assessment:

Performance Deficiency: The failure to provide adequate procedures for maintenance on safety-related equipment was a performance deficiency. Specifically, the licensee's failure to provide instructions to ensure the set screws were properly torqued led to the train 2B of ECW to be declared inoperable.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Procedure Quality attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to provide an adequate maintenance procedure to install the ECW strainer motor to speed reducer coupling required the licensee to incorporate proper torque values and re-perform the maintenance on the 2B ECW strainer.

Significance: The inspectors assessed the significance of the finding using Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The issue screened as having very low safety significance (Green) because while it did represent a loss of operability for one train of ECW, the issue did not represent a loss of a probabilistic risk assessment (PRA) function greater than its allowed technical specification allowed outage time, a loss of PRA function for two separate TS systems for greater than 24 hours, a loss of

a PRA system or function defined in the Plant Risk Information e-Book (PRIB) or licensee's PRA for greater than 24 hours, or loss of the PRA function of one or more non-TS trains of equipment designated as risk-significant in accordance with the licensee's maintenance rule program for greater than 3 days.

Cross-Cutting Aspect: H.7 - Documentation: The organization creates and maintains complete, accurate and up-to-date documentation. The inspectors determined that the finding had a crosscutting aspect in the area of documentation. Specifically, the licensee should have evaluated or incorporated vendor technical manual guidance to ensure set screws for the strainer motor to speed reducer coupling were torqued to a proper value.

Enforcement:

Violation: Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained in accordance with Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 9.a requires, in part, that maintenance that can affect the performance of safety-related equipment should be properly pre-planned. The licensee established WANs 464256 and 659898, to meet the Regulatory Guide 1.33 requirement.

Contrary to the above, since December 8, 2012, the licensee failed to properly pre-plan maintenance that can affect the performance of safety-related equipment. Specifically, WANs 464256 and 659898 failed to ensure set screws for the strainer motor to speed reducer coupling are torqued to the correct value with a calibrated torque wrench. This violation was entered into the licensee's corrective action program as CR 2021-9789.

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

Failure to Demonstrate Control of Pressurizer Power Operated Relief Valve Performance Under the Maintenance Rule

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000498,05000499/2021004-02 Open/Closed	None	71111.19

The inspectors identified a Green, non-cited violation of 10 CFR 50.65(a)(2), for failure to demonstrate effective control of performance of a maintenance rule scoped system through appropriate preventive maintenance. Specifically, the licensee failed to create and schedule regular preventive maintenance actions to inspect or replace parts for the Unit 1 pressurizer power operated relief valve (PORV) 656A.

Description: The inspectors identified that the licensee failed to demonstrate the performance or condition of a system, structure, or component (SSC) subject to the maintenance rule was being effectively controlled through the performance of appropriate preventive measures.

On August 1, 2020, the licensee observed higher than normal temperatures on the downstream piping from the pressurizer relief valves to the pressurizer relief tank in Unit 1. The licensee determined that pressurizer PORV 656A had excessive leak-by and declared the valve inoperable. The licensee subsequently shut the associated pressurizer PORV block valve until the pressurizer PORV was tested on October 9, 2021, prior to a scheduled Unit 1 refueling outage. During the time of inoperability, pressurizer PORV 656A was not able to be

relied upon to perform its safety related function to provide manual control of reactor coolant system pressure.

The licensee disassembled PORV 656A during the refueling outage and replaces all necessary components. The inspectors discovered that the licensee did not have preventive maintenance measures in place to replace any parts associated with the pressurizer PORVs, except gaskets.

The inspectors discovered that the licensee had previously evaluated whether to implement overhaul preventive maintenance actions on a scheduled basis along with other potential actions. Instead, the licensee chose to change the PORV seat material to Inconel.

Corrective Actions: The licensee replaced internal components of pressurizer PORV 656A, including the solenoid assembly, during the planned refueling outage for Unit 1. The licensee has placed this issue in their corrective action program to evaluate appropriate preventive maintenance.

Corrective Action References: CR 2020-8152, CR 2021-10369

Performance Assessment:

Performance Deficiency: The failure to monitor the performance or demonstrate effective control of performance of systems covered by the maintenance rule is a performance deficiency. Specifically, the licensee failed to create and schedule regular preventive maintenance actions to inspect or replace parts for the Unit 1 pressurizer power operated relief valve (PORV) 656A.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Equipment Performance attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. It adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, the licensee failed to monitor the performance or demonstrate effective control of performance for Unit 1, pressurizer PORV 656A as evidenced by not having any preventive maintenance replacement actions for components within the valve. As a result, pressurizer PORV 656A experienced leak-by which required the associated block valve to be closed upon discovery until the next refueling outage.

Significance: The inspectors assessed the significance of the finding using Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” The inspectors determined the finding did not result in exceeding the reactor coolant system leak rate for a small loss of coolant accident, nor did the finding likely affect other systems used to mitigate a loss of coolant accident.

Cross-Cutting Aspect: None. No cross-cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance.

Enforcement:

Violation: 10 CFR 50.65(a)(1), requires, in part, that the holders of an operating license shall monitor the performance or condition of SSCs within the scope of the rule as defined by 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide

reasonable assurance that such SSCs are capable of fulfilling their intended functions.

10 CFR 50.65(a)(2) states, in part, that monitoring as specified in 10 CFR 50.65(a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended function.

Contrary to the above, as of October 9, 2021, the licensee failed to demonstrate that the performance of the pressurizer PORV 656A had been effectively controlled through the performance of appropriate preventive maintenance such that the SSC remained capable of performing its intended function. Specifically, the licensee failed to implement adequate preventive maintenance procedures such that the Unit 1 pressurizer PORV 656A remained capable of performing its intended function.

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

Failure to Demonstrate Control of Performance Under the Maintenance Rule			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000498,05000499/2021004-03 Open/Closed	None	71152

The inspectors identified a Green, non-cited violation of 10 CFR 50.65(a)(2), for failure to demonstrate effective control of performance of a maintenance rule scoped system through appropriate preventive maintenance. Specifically, the licensee failed to create adequate preventive maintenance actions to inspect the auxiliary contacts in the control room hand switch for the high head safety injection (HHSI) pump 2B that automatically starts the associated room cooler fans.

Description: The inspectors identified that the licensee failed to demonstrate the performance or condition of an SSC subject to the maintenance rule was being effectively controlled through the performance of appropriate preventive measures.

On October 15, 2021, the licensee started Unit 2 HHSI pump 2B from the control room by its associated hand switch. The emergency core cooling system (ECCS) room cooler fans also receive a start signal from auxiliary contacts housed within the HHSI pump hand switches. The ECCS room cooler fans did not automatically start with HHSI pump 2B, so the licensee secured HHSI pump 2B. The licensee determined that the failure of the fans to start was due to a failure within the associated HHSI pump hand switch in the control room.

The HHSI pump hand switch is a GE model SBM hand switch. During review, the inspectors discovered that the vendor technical document for this GE model SBM hand switch recommends at regular intervals to inspect for wear and burning by using the inspection hole built into the hand switch. The vendor technical document states to clean with a burnishing tool if there is buildup. The inspectors found the licensee's preventive maintenance procedures directs operators to periodically cycle the hand switch 3-5 times in an attempt to wipe the internal contacts. During troubleshooting, the licensee noted that the hand switch was sticking when operators cycled the hand switch. The inspectors noted there were no steps in the procedure that directed an inspection of the hand switch internals through the built in inspection port.

The inspectors verified the hand switch last successfully started the Unit 2 train B HHSI pump and associated ECCS room cooler fans on October 5, 2021. This was 10 days before the failure occurred on October 15, 2021. The technical specification allowed outage time for the ECCS system, which includes the HHSI along with low head safety injection and containment spray systems, is 7 days.

The inspectors concluded that the licensee failed to demonstrate the performance or condition of the hand switch used for the HHSI pump was being effectively controlled through the performance of appropriate preventive measures.

Corrective Actions: The licensee replaced the hand switch for Unit 2, train B HHSI pump. The licensee has also initiated corrective actions for adjusting preventive maintenance measures. The licensee also submitted a licensee event report for exceeding the allowed technical specification outage time for Unit 2, train B ECCS.

Corrective Action References: CR 2021-10753

Performance Assessment:

Performance Deficiency: The failure to monitor the performance or demonstrate effective control of performance of systems covered by the maintenance rule is a performance deficiency. Specifically, the licensee to create adequate preventive maintenance actions to inspect the auxiliary contacts in the control room hand switch for the high head safety injection (HHSI) pump 2B that automatically starts the associated room cooler fans.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Equipment Performance attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. The inspectors determined the performance deficiency was more than minor because it was associated with the equipment performance attribute of the Mitigating Systems Cornerstone. It adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage) because the finding represented a reduction in the reliability and availability of a mitigating system. Specifically, the failure to ensure that proper maintenance was performed on the Unit 2 train B HHSI pump hand switch led to the ECCS room cooler fans to fail to start as required during a HHSI pump start.

Significance: The inspectors assessed the significance of the finding using Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” The inspectors determined the finding represented a loss of the probabilistic risk analysis (PRA) function of one train of a multi-train technical specification system for greater than its technical specification allowed outage time, thus requiring a detailed risk evaluation.

To evaluate the risk of this performance deficiency, the senior reactor analyst utilized the plant-specific Standardized Plant Analysis Risk (SPAR) model for the South Texas Project. As a surrogate for the failure of the hand switch, the analyst set Basic Event HPI-MDP-FR-P1B, “HHSI Pump P1B Fails to Run,” to the house event TRUE. This event models the failure of the high-head pump itself. The resulting change in core damage probability quantified by the SPAR over a 10-day period was 3.76E-07. The analyst noted that only two of the three ECCS room coolers are required to cool all three rooms. Therefore, the analyst assumed that the failure of a second fan would be required to lose the high head

injection function.

Additionally, the fans are only needed for long-term cooling with all three trains operating. This would provide some period for operators to locally start the fans. Most of the core damage sequences from the SPAR did not lead to recirculation, so the analyst assumed that access to the rooms would be available. As a result of these assumptions, the analyst determined qualitatively that the incremental conditional core damage probability would be much less than 1.0E-07. Therefore, this finding is of very low safety significance (Green).

Cross-Cutting Aspect: None. No cross-cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance.

Enforcement:

Violation: 10 CFR 50.65(a)(1), requires, in part, that the holders of an operating license shall monitor the performance or condition of SSCs within the scope of the rule as defined by 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions.

10 CFR 50.65(a)(2) states, in part, that monitoring as specified in 10 CFR 50.65(a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended function.

Contrary to the above, as of October 15, 2021, the licensee failed to demonstrate that the performance of the Unit 2, train B ECCS had been effectively controlled through the performance of appropriate preventive maintenance such that the SSC remained capable of performing its intended function. Specifically, the licensee failed to implement adequate preventive maintenance procedures such that the Unit 2, train B ECCS cooler fans remained capable of performing its intended function.

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

EXIT MEETINGS AND DEBRIEFS

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

- On October 28, 2021, the inspectors presented the inservice inspection results to G. T. Powell, President and CEO and other members of the licensee staff.
- On December 2, 2021, the inspectors presented the 10 CFR 50.155(b)(2) Emergency Preparedness Drill Evaluation inspection results to Mr. J. Bodnar, Acting Emergency Preparedness Manager and other members of the licensee staff.
- On December 20, 2021, the inspectors presented the BRQ Inspection Exit Meeting inspection results to Michael Schaefer - Site Vice President for Operations and other members of the licensee staff.
- On January 6, 2022, the inspectors presented the integrated inspection results to Kym Harshaw, Chief Nuclear Officer, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.05	Corrective Action Documents	CR-YYYY-NNNN	2021-11124, 2021-10842, 2021-12326	
71111.05	Procedures	0EAB07-FP-0071	Fire Preplan Electrical Auxiliary Building, Auxiliary Shutdown Area	4
71111.05	Procedures	0LDG99-FP-0910	Fire Preplan for Lighting Diesel Generator Building	4
71111.05	Procedures	0MAB79-FP-0162	Fire Preplan FLEX Diesel Generator Enclosure	2
71111.05	Procedures	0PGP03-ZF-0011	STPEGS Fire Brigade	20
71111.05	Procedures	0RCB63-FP-0223	Fire Preplan Reactor Containment Building Steam Generator 1C	5
71111.05	Procedures	0RCB63-FP-0226	Fire Preplan Reactor Containment Building RHR Cubicle, Train A	4
71111.05	Procedures	0RCB63-FP-0227	Fire Preplan Reactor Containment Building RHR Cubicle, Train B	5
71111.07A	Corrective Action Documents	CR-YYYY-NNNN	2021-10481	
71111.08P	Corrective Action Documents	CR-YYYY-NNNN	2020-10864, 2020-11720, 2020-11760, 2020-11880, 2020-12125, 2020-12344, 2020-12819, 2020-4806, 2021-5784, 2021-10481, 2021-10505, 2021-10358, 2021-10353, 2021-10495, 2021-10498, 2021-10489, 2021-10493, 2021-10501, 2021-10500, 2021-10502, 2021-10504, 2021-10571, 2021-10431, 2021-10572, 2021-10573, 2021-10432, 2021-10433, 2021-10434, 2021-10490, 2021-10497, 2021-10472, 2021-10565, 2021-10567, 2021-10569, 2021-10435, 2021-10509, 2021-10354, 2021-10355, 2021-10422, 2021-10424, 2021-10428, 2021-10415, 2021-10417, 2021-10419, 2021-10420, 2021-10131, 2021-10540, 2021-10546, 2021-10547, 2021-10541, 2021-10542, 2021-10499, 2021-10479, 2021-10476, 2021-10478, 2021-10481, 2021-10484, 2021-10487, 2021-10480, 2021-10482, 2021-10592, 2021-10548,	
71111.08P	Engineering	07-16703-3	Code Case N566-1 Bolted Joint Evaluation Unit 1 on RHR	11/21/2007

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Evaluations		HEAT EXCHANGER 1B (2R161NHX101B).	
71111.08P	Engineering Evaluations	17-16232-2	Dry boron deposits indicating an inactive leak were observed on Residual Heat Removal (RHR) System Heat Exchanger (HX) 1B during system pressure test, 0PSP15-RH-0001 completed on May 17, 2017.	11/16/2017
71111.08P	Miscellaneous		Inservice Inspection Program Plan for the South Texas Project Electric Generating Station Units 1 and 2	10
71111.08P	Miscellaneous	N-566-2	Corrective Action for Leakage Identified at Bolted Connections Section XI, Division 1	03/28/2001
71111.08P	Miscellaneous	NOC-AE-00000868	Request for Relief from ASME Boiler and Pressure Vessel Code Section XI Requirements for Containment Tendon Examination and Inspection	07/10/2000
71111.08P	Miscellaneous	NOC-AE-00000921	Amended Request for Relief from ASME Boiler and Pressure Vessel Code Section XI Requirements for Containment Tendon Examination and Inspection	09/14/2000
71111.08P	Miscellaneous	NOC-AE-19003684	Proposed Alternative to ASME Boiler & Pressure Vessel Code Section XI Requirements for Repair/Replacement of Essential Cooling Water (ECW) System Class 3 Buried Piping in accordance with 10 CFR 50.55a(z)(1)	09/26/2019
71111.08P	Miscellaneous	NOC-AE-19003696	Supplemental Information for Proposed Alternative to ASME Code Requirements for the Repair/Replacement of Essential Cooling Water System Class 3 Buried Piping	11/26/2019
71111.08P	Miscellaneous	ST-AE-NOC-01000790	SOUTH TEXAS PROJECT, UNITS 1 AND 2 - REQUEST FOR RELIEF FROM AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI, CONTAINMENT IN-SERVICE INSPECTION (ISI) REQUIREMENTS (TAC NOS. MA9508 AND MA9509)	03/15/2001
71111.08P	NDE Reports	UT-2021-052	Ultrasonic Examination - Elbow to Pipe / 12-RC-1221-BB1 Weld 13	10/18/2021
71111.08P	NDE Reports	PT-2021-077	Liquid Penetrant Examination - Lo Head Safety Injection Train A to Loop 1A Cold Leg Check Valve	10/19/2021
71111.08P	NDE Reports	RT-2021-004	Radiographic Examination - RT Reader Sheets for 1RE23 for RH0032A replacement welds	10/22/2021
71111.08P	NDE Reports	UT-2021-043	Ultrasonic Examination - Relief Nozzle to Shell / PRZ-1-N4A	10/15/2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.08P	NDE Reports	UT-2021-050	Ultrasonic Examination - Pipe to Elbow / 12-RC-1221-BB1 Weld 9	10/18/2021
71111.08P	NDE Reports	UT-2021-051	Ultrasonic Examination - Pipe to Pipe / 12-RC-1221-BB1 Weld 11	10/18/2021
71111.08P	NDE Reports	UT-2021-062	Ultrasonic Examination - Pipe to Valve / 8-RH-1107-BB2 Weld 2	10/21/2021
71111.08P	NDE Reports	UT-2021-063	Ultrasonic Examination - Valve to Pipe / 8-RH-1108-BB1 Weld 1	10/21/2021
71111.08P	NDE Reports	VT1/3-2021-015	Visual VT-1/3 Examination - RH32A Freeze Seal Area of Pipe	10/16/2021
71111.08P	NDE Reports	VT1/3-2021-016	Visual VT-1/3 Examination - Lo Head Safety Injection Train A to Loop 1A Cold Leg Check Valve	10/18/2021
71111.08P	Procedures	0PEP10-ZA-0010	Liquid Penetrant Examination (Color Contrast Solvent Removable)	9
71111.08P	Procedures	0PEP10-ZA-0017	Magnetic Particle Examination (Dry Powder Yoke Method)	7
71111.08P	Procedures	0PEP10-ZA-0023	Visual Examination of Component Supports for ASME Section XI Inservice Inspection	8
71111.08P	Procedures	0PEP10-ZA-0024	ASME XI Examination for VT-1 and VT-3	6
71111.08P	Procedures	0PGP03-ZE-0033	RCS Pressure Boundary Inspection for Boric Acid Leaks	13
71111.08P	Procedures	0PMP02-ZW-0001	General Welding Requirements	12
71111.08P	Procedures	0PMP02-ZW-0001A	ASME Repair/Replacement Welding Requirements	2
71111.08P	Procedures	0PMP02-ZW-0001B	ASME/ANSI B31.1 Welding Requirements	2
71111.08P	Procedures	0PMP02-ZW-0001C	AWS/HVAC Welding Requirements	1
71111.08P	Procedures	0PMP02-ZW-0001D	Welding Documentation Requirements	2
71111.08P	Procedures	0PMP02-ZW-0002	Welding Procedure Specification Preparation and Qualification	8
71111.08P	Procedures	0PMP02-ZW-0003	Welder Qualification and Certification	11
71111.08P	Procedures	0PMP02-ZW-	Control of Filler Materials	19

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		0004		
71111.08P	Procedures	0PMP02-ZW-0005	Control of Post Weld Heat Treatment	6
71111.08P	Procedures	0PMP02-ZW-0006	Arc Wire Thermal Spray Coatings	2
71111.08P	Procedures	OPGP03-ZA-0014	Foreign Mataterial Exclusion Program	39
71111.08P	Procedures	OPGP03-ZE-0027	ASME Section XI Repair/Replacement Activities	31
71111.08P	Procedures	OPGP03-ZE-0082	ASME Section XI Repair/Replacement Activity Pressure Testing	1
71111.08P	Procedures	OPSP11-ZE-0001	Check Valve Inspection	13
71111.08P	Procedures	TP-SEE-21-1	Pre-Installation Seat Leakage Test of 8C88 Built to Drawing 10162D40	0
71111.08P	Work Orders		660885, 32879, 96023523, 96019255, 655129, 632879	
71111.11B	Corrective Action Documents	CR-YYYY-NNNN	2021-2894, 2021-5625, 2020-6295, 2021-5626	
71111.11B	Corrective Action Documents	Simulator Deficiency Records	3073, 2994, 3063, 3072, 3005, 3059, 3067, 3052	
71111.11B	Miscellaneous		Simulator Differences List	02/15/2021
71111.11B	Miscellaneous		Simulator Configuration Management Committee (SCMC) Agenda	03/23/2021
71111.11B	Miscellaneous		Simulator Configuration Management Committee (SCMC) Agenda	1/26/2021
71111.11B	Miscellaneous		Simulator Configuration Management Committee (SCMC) Agenda	11/11/2019
71111.11B	Miscellaneous		Simulator Configuration Management Committee (SCMC) Agenda	12/2/2020
71111.11B	Miscellaneous	0PGP03-ZA-0128A	Medical Examinations-NRC Regulated	3
71111.11B	Miscellaneous	Exam 23	Annual Performance Test	1
71111.11B	Miscellaneous	Exam 25	Annual Performance Test	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.11B	Miscellaneous	Exam 26	Annual Performance Test	0
71111.11B	Miscellaneous	Exam 27	Annual Performance Test	2
71111.11B	Miscellaneous	JPM 002.02A	Place RWST on Recirculation In Plant #1	2
71111.11B	Miscellaneous	JPM 004.02	Restore Power to the Pressurizer PORV Isolation Valves In-Plant #12	11
71111.11B	Miscellaneous	JPM 010.02	Place Rod Control MG Set In Service In-Plant #15	5
71111.11B	Miscellaneous	JPM 011.02	Fill the AFWST Using the Hotwell Dump Pump In-Plant #16	11
71111.11B	Miscellaneous	JPM 022.03	Locally Open Instrument Air to Containment In-Plant #17	2
71111.11B	Miscellaneous	JPM 023.02	Restore Power to Stripped 480V MCCs and Restore RCB HVAC In-Plant #18	8
71111.11B	Miscellaneous	JPM 031.02	Locally Close MSIV and MSIB In-Plant #19	11
71111.11B	Miscellaneous	JPM 035.02	Locally Start a Diesel Fire Pump at the Fire Pump House In-Plant #20	13
71111.11B	Miscellaneous	JPM 039.02	Verify Containment Isolation Phase B In Plant #2	10
71111.11B	Miscellaneous	JPM 040.01	Declare Emergency Action Levels	2
71111.11B	Miscellaneous	JPM 041.01	Declare Emergency Action Levels	3
71111.11B	Miscellaneous	JPM 042.02	Locally Establish CCW Flow During a Control Room Evacuation In-Plant #3	12
71111.11B	Miscellaneous	JPM 045.02	Establish Secondary System Contamination Control In-Plant #4	9
71111.11B	Miscellaneous	JPM 052.02	Locally Align Alternate Boration Flowpath via BA Gravity Drain to CCP Suction In-Plant #5	9
71111.11B	Miscellaneous	JPM 060.02	Perform Local Channel Check of RT-8038 In-Plant #6	3
71111.11B	Miscellaneous	JPM 082.02	Locally Operate Any SG PORV In-Plant #10	3
71111.11B	Miscellaneous	JPM 109.01	Declare Emergency Action Levels	8
71111.11B	Miscellaneous	JPM 111.01	Declare Emergency Action Levels	6
71111.11B	Miscellaneous	JPM 123.01	Startup of GWPS Following PMT In-Plant #11	0
71111.11B	Miscellaneous	JPM 125.02	Locally Maintain CCW Surge Tank Level In-Plant #13	8
71111.11B	Miscellaneous	JPM 128.02	Transfer of Class 1E 125V DC Battery Chargers In-Plant #14	6
71111.11B	Miscellaneous	JPM 134.01	Declare Emergency Action Levels	5
71111.11B	Miscellaneous	JPM 141.01	Declare Emergency Action Levels	4
71111.11B	Miscellaneous	JPM 149.01	Declare Emergency Action Levels	4
71111.11B	Procedures	0PGP03-ZT-0132	Licensed Operator Requalification	14

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.11B	Procedures	0PGP03-ZX-0002A	CAQ Resolution Process	15
71111.11B	Procedures	0PGP03-ZX-0002B	Station Cause Analysis Program	13
71111.11B	Procedures	0PNT01-TQ-1001	Examination Security	7
71111.11B	Procedures	0PNT01-ZT-0300	LOR Training Program	0
71111.11B	Procedures	0PNT01-ZT-0301	LOR Annual and Biennial Evaluation	0
71111.11B	Procedures	0PNT01-ZT-0302	LOR Exam Bank	0
71111.11B	Procedures	0PNT01-ZT-0303	LOR Two-Year Training Plan	0
71111.11B	Procedures	0PNT01-ZT-0304	LOR Conduct of Simulator Training	0
71111.11B	Procedures	0POP01-ZA-0014	Initial Operator License and Licensed Operator Programs	33
71111.11B	Procedures	CAP-0003	Condition Report Screening	5
71111.11B	Procedures	LOR-GL-0002	LOR Annual and Biennial Evaluation Guidelines	24
71111.11Q	Procedures	0POP03-ZG-0007	Plant Cooldown	97
71111.15	Corrective Action Documents	CR-YYYY-NNNN	2012-31542, 2021-9789, 2021-11880, 2014-4235, 2021-11711	
71111.15	Miscellaneous	Design Change Package 13-10831-2	Enhance ECW Self-Cleaning Strainer Gib Head Key Design	03/13/2014
71111.15	Miscellaneous	Vendor Technical Document VTD-L253-0002	Lovejoy Couplings Jaw Type	1
71111.15	Miscellaneous	Vendor Technical Document VTD-W232-0001	Speed Reducers Installation, Operation, and Lubrication Instructions	04/01/1995
71111.15	Work Orders	Work Authorization Number	464256	
71111.19	Corrective Action Documents	CR-YYYY-NNNN	2021-11726, 2021-10369, 2020-8152, 2004-14935	
71111.19	Miscellaneous	Vendor Technical Document VTD-C710-0008	Instruction Manual, Operation & Maintenance Instructions for Solenoid Powered Operated Relief Valve	2

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.19	Procedures	0PSP02-NI-0035	Intermediate Range Neutron Flux Channel 1 ACOT (N-0035)	20
71111.20	Corrective Action Documents Resulting from Inspection	CR-YYYY-NNNN	2021-10834, 2021-10835, 2021-10827, 2021-10824, 2021-10823	
71111.22	Corrective Action Documents	CR-YYYY-NNNN	2020-3576, 2021-10795, 2021-11821,	
71111.22	Procedures	0PSP03-SP-0019D	Turbine Driven Auxiliary Feedwater Actuation and Response Time Test	17
71111.22	Procedures	0PSP05-RC-0051	Reactor Coolant System Sub-Cooling Margin Monitor Calibration (T-0051)	20
71111.22	Procedures	0PSP05-RC-0407L	RCS Extended Range Pressure Set 4 Loop Calibration (P-0407)	6
71111.22	Work Orders	Work Authorization Number	630811, 661026, 661027, 598390	
71114.01	Corrective Action Documents	CR-YYYY-NNNN	2021-12667, 2021-12714, 2021-12770, 2021-12771, 2021-12853	
71114.01	Engineering Changes	DCP #07-5234-25	Add Fill Capability to RWST Overflow Line	06/28/2007
71114.01	Miscellaneous		Combined Functional Drill Final Report, Red Team, August 1, 2018	11/8/2018
71114.01	Procedures	0ERP01-ZV-TS04	Radiological Manager	12
71114.01	Procedures	0PGP03-ZF-0011	STPEGS Fire Brigade	20
71114.01	Procedures	0PGP03-ZT-0139	Emergency Preparedness Training Program	26
71114.01	Procedures	0PGP05-ZV-0001	Emergency Response Exercises and Drills	17
71114.01	Procedures	0POP10-ZO-EDMG	Extensive Damage Mitigation Guideline	7
71114.01	Procedures	0POP12-ZO-FSG20	Alternate QDPS Parameter Monitoring	2
71114.01	Procedures	ZV-0027	Drill and Exercise Performance Objectives and Demonstration Critieria	6
71114.06	Procedures	0ERP01-ZV-IN01	Emergency Classification	11

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71114.06	Procedures	0ERP01-ZV-IN02	Notifications to Offsite Agencies	35
71114.06	Procedures	0POP05-EO-EO00	Reactor Trip or Safety Injection	26
71114.06	Procedures	0POP05-EO-EO10	Loss of Reactor or Secondary Coolant	23
71114.06	Procedures	0POP05-EO-ES13	Transfer to Cold Leg Recirculation	12
71152	Corrective Action Documents	CR-YYYY-NNNN	2021-6014, 2021-2063, 2019-14566, 2021-6065	