



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

April 26, 2022

Mr. Fadi Diya  
Senior Vice President and Chief Nuclear Officer  
Ameren Missouri  
8315 County Road 459  
Stedman, MO 65077

SUBJECT: CALLAWAY PLANT – INTEGRATED INSPECTION  
REPORT 05000483/2022001

Dear Mr. Diya:

On March 31, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the Callaway Plant. On April 6, 2022, the NRC inspectors discussed the results of this inspection with Mr. B. Cox, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

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

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in blue ink that reads "Gregory E. Werner".

Signed by Werner, Gregory  
on 04/26/22

Gregory E. Werner, Chief  
Projects Branch B  
Division of Operating Reactor Safety

Docket No. 05000483  
License No. NPF-30

Enclosure:  
Inspection Report 05000483/2022001

CALLAWAY PLANT – INTEGRATED INSPECTION REPORT 05000483/2022001 DATED – APRIL 26, 2022

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

Docket Number: 05000483

License Number: NPF-30

Report Number: 05000483/2022001

Enterprise Identifier: I-2022-001-0005

Licensee: Ameren Missouri

Facility: Callaway Plant

Location: Steedman, MO

Inspection Dates: January 1 to March 31, 2022

Inspectors: D. Bradley, Senior Resident Inspector  
S. Hedger, Senior Emergency Preparedness Inspector  
S. Janicki, Resident Inspector  
J. Melfi, Project Engineer  
A. Smallwood, Project Engineer

Approved By: Gregory E. Werner, Chief  
Projects Branch B  
Division of Operating Reactor Safety

Enclosure

## SUMMARY

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

### List of Findings and Violations

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

### Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	05000483/2021003-01	Failure to Maintain Siren Design as Described in the Alert and Notification System Report	71114.04	Closed

## PLANT STATUS

Callaway began the inspection period at rated thermal power. On January 7, 2022, the plant tripped during surveillance testing on the reactor trip circuit breakers. On January 10, the licensee restarted the reactor. On January 11 the licensee reached rated thermal power and remained at or near rated thermal power for the remainder 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 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 temperatures and precipitation for the emergency diesel generators and condensate storage tank on February 1, 2022.

### 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) Vital inverter NN17 on January 12, 2022
- (2) Centrifugal charging pump A on January 25, 2022
- (3) Residual heat removal pump A on March 9, 2022

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

- (1) The inspectors evaluated system configurations during a complete walkdown of the A motor-driven auxiliary feedwater system on February 22, 2022.

## 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) Auxiliary building 2026 foot elevation general area and motor generator set room, fire areas A-16 and A-26, on January 5, 2022
- (2) Essential service water pumphouse and ultimate heat sink cooling tower, fire areas UNPH and UNCT, on January 12, 2022
- (3) Control building and communication corridor 2016 foot elevation, non-vital switchgear and transformer room, fire area C-15 on January 31, 2022
- (4) Fuel building 2047 foot elevation general area, fire area FB-1 on March 8, 2022

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

- (1) The inspectors evaluated the on-site fire brigade training and performance during an announced fire drill on January 31, 2022.

## 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) Spent fuel pool cooling system and storage area rooms on March 15, 2022

## 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 reactor startup activities on January 9-10, 2022.

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

- (1) The inspectors observed and evaluated licensed operator training in the simulator, including reactor coolant system leak training and emergency procedures, on February 10, 2022.

## 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) Residual heat removal pump A on January 3, 2022

- (2) Room cooling for the B component cooling water pump room, including the failure of SGL11B on December 11, 2021, under Condition Report 202106768, on January 26, 2022

#### 71111.13 - Maintenance Risk Assessments and Emergent Work Control

##### Risk Assessment and Management Sample (IP Section 03.01) (4 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) Elevated risk for a planned work window on train B residual heat removal system on January 4, 2022
- (2) Elevated risk for a planned work window on train B centrifugal charging pump and component cooling water system on January 25, 2022
- (3) Elevated risk for a planned work window on train B class 1E air conditioning system on February 1, 2022
- (4) Elevated risk for a planned work window on train B control room emergency ventilation system on February 23, 2022

#### 71111.15 - Operability Determinations and Functionality Assessments

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

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

- (1) Longer closing times observed on component cooling water return isolation valve, EGHV0069B, under Condition Report 202200072, on January 6, 2022
- (2) Tripped room cooler SGL15A for the north electrical penetration room, under Condition Report 202200375, on January 19, 2022
- (3) Equipment installed in switchyard breaker enclosures MDV 54/55, under Condition Report 202200788, on February 8, 2022
- (4) Essential service water leakage on the A emergency diesel generator jacket water heat exchanger EKJ06A, under Condition Report 202200942, on February 17, 2022

#### 71111.18 - Plant Modifications

##### Severe Accident Management Guidelines Update (IP Section 03.03) (1 Sample)

- (1) The inspectors verified the site Severe Accident Management Guidelines were updated in accordance with the pressurized water reactor generic severe accident technical guidelines and validated in accordance with NEI 14-01, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents," Revision 1, on January 3, 2022

### 71111.19 – Post-Maintenance Testing

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

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

- (1) Train B residual heat removal pump after a planned work window on January 5, 2022
- (2) Train A vital AC instrument system power inverter NN11 after a planned work window on January 10, 2022
- (3) Train B centrifugal charging pump after a planned work window on January 25, 2022
- (4) Train B class 1E electrical equipment air conditioning after a planned work window on February 2, 2022
- (5) Train B component cooling water system after a planned work window on February 22, 2022

### 71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance testing activities to verify system operability and/or functionality:

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

- (1) Train B emergency diesel generator monthly test on January 6, 2022
- (2) Train A emergency diesel generator fast start test on January 19, 2022
- (3) Reactor coolant pump under frequency and under voltage surveillance test on February 24, 2022

#### Inservice Testing (IP Section 03.01) (2 Samples)

- (1) Train A centrifugal charging pump on January 11, 2022
- (2) Train A residual heat removal pump and valve on March 1, 2022

### 71114.04 - Emergency Action Level and Emergency Plan Changes

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

- (1) The inspectors evaluated input provided by the Federal Emergency Management Agency regarding an observed deviation from the licensee's alert and notification system (ANS) siren pole design as described in the approved ANS design report. The deviation was identified during an inspection conducted September 20-24, 2021.

### 71114.06 - Drill Evaluation

#### Drill/Training Evolution Observation (IP Section 03.02) (2 Samples)

The inspectors evaluated:

- (1) Team 4 emergency response organization training drill on February 10, 2022
- (2) Team 3 emergency response organization training drill on March 10, 2022



## OTHER ACTIVITIES – BASELINE

### 71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

#### MS06: Emergency AC Power Systems (IP Section 02.05) (1 Sample)

- (1) January 1, 2021, through December 31, 2021

#### MS10: Cooling Water Support Systems (IP Section 02.09) (1 Sample)

- (1) January 1, 2021, through December 31, 2021

#### BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (1 Sample)

- (1) January 1, 2021, through December 31, 2021

### 71152A - Annual Follow-up Problem Identification and Resolution

#### Annual Follow-up of Selected Issues (Section 03.03) (1 Sample)

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

- (1) Barrier impairment during the replacement of door DSK33022, under Condition Report 202106981, on January 27, 2022

### 71153 – Follow-up of Events and Notices of Enforcement Discretion

#### Personnel Performance (IP Section 03.03) (1 Sample)

- (1) The inspectors evaluated a reactor trip during reactor trip breaker surveillance testing and the licensee's performance on January 7 and January 8, 2022.

## INSPECTION RESULTS

Unresolved Item	Failure to Maintain Siren Design as Described in the Alert and Notification System Report URI 05000483/2021003-01	71114.04
Description: During an inspection conducted September 20-24, 2021, the inspectors identified a deviation between the height of the licensee's emergency response sirens and the design height as described in their Federal Emergency Management Agency (FEMA) approved ANS design report. Therefore, inspectors documented the apparent deviation between the siren pole construction and the design report in Unresolved Item 05000483/2020003-01 (ML21306A347). On November 18, 2021, the NRC requested a review by FEMA to establish whether the licensee was in compliance with the ANS requirements (ML21322A108).		
On February 4, 2022, FEMA's response (ML22039A086) indicated that the licensee's change to the siren pole heights was inconsistent with the commitments in the approved ANS design report (December 2020). However, a more recently approved revision to the ANS design report (March 24, 2021), adopting the Integrated Public Alert and Warning System as the		

primary means of public notification, did acknowledge that the sirens were “approximately 40 feet high.” FEMA determined that the reduced height of the siren poles does not negatively impact the siren system’s coverage. Based on this, and clarifying communications with FEMA (ML22047A231), the deviation does not meet the definition of a significant change as defined in 44 CFR 350.14(b).

Using FEMA's input, the inspectors concluded that, from January to March 2021, the as-built design for 23 of 29 of the siren poles was not in compliance with an approved ANS design report. These changes were made without FEMA’s prior approval. However, since the deviation did not meet FEMA's determination criteria of constituting a significant change, it is considered a minor performance deficiency. The issue is being addressed by the licensee in the corrective action program.

Corrective Action Reference: Condition Report 202105375

### **EXIT MEETINGS AND DEBRIEFS**

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

- On April 6, 2022, the inspectors presented the integrated inspection results to Mr. B. Cox, Site Vice President, and other members of the licensee staff.
- On March 28, 2022, the inspectors presented the ANS siren design unresolved item inspection results to Mr. G. Rauch, Manager, Emergency Preparedness, and other members of the licensee staff.

### **THIRD PARTY REVIEWS**

The inspectors reviewed Institute on Nuclear Power Operations reports that were issued during the inspection period.

## DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.01	Miscellaneous	POL0059	Callaway Energy Center Personnel Support Plan	2
71111.01	Procedures	OTO-ZZ-00012	Severe Weather	44
71111.04	Corrective Action Documents	Condition Reports	201602500, 201603131, 201707731, 201807138, 201907023, 201907538	
71111.04	Miscellaneous		Valve Retest Manual	60
71111.04	Miscellaneous	GK-11	Electrical Heat Loads in the Control Building During Normal and ESFAS Conditions Calculation	5
71111.04	Miscellaneous	M-22 MEJ01	Piping and Instrumentation Diagram Residual Heat Removal System - FSAR Figure 5.4-7	62
71111.04	Procedures	ITP-ZZ-00004	Response Time Testing	17
71111.04	Procedures	ODP-ZZ-00002	Equipment Status Control	95
71111.04	Procedures	OSP-EJ-V001A	Train A RHR Valve IST	7
71111.04	Procedures	OTN-AL-00001	Auxiliary Feedwater System	38
71111.04	Procedures	OTN-BG-00001	Chemical and Volume Control System	57
71111.04	Procedures	OTN-NN-00001	120V Vital AC Instrument Power	22
71111.05	Corrective Action Documents	Condition Reports	202007887, 202107019, 202200902, 202200905	
71111.05	Miscellaneous		Fire Preplan Manual	Various
71111.05	Miscellaneous	KC-168	Callaway Fire Protection Monitoring Calculation	1
71111.05	Procedures	EDP-ZZ-01101	Fire Protection Monitoring Program	30
71111.05	Procedures	FFP-ZZ-00009	Fire Protection Training Program	39
71111.05	Procedures	OSP-KC-00015	Fire Door Inspections	24
71111.05	Procedures	SDP-KC-00001	Requirements for and Duties of Compensatory Fire Watches	12
71111.05	Procedures	SDP-KC-00002	Fire Door Position Verification	12
71111.06	Drawings	A-2319	Fuel Building Floor Plans	3
71111.06	Drawings	M-22KC01	Fire Protection System Piping and Instrumentation Diagram	14
71111.06	Miscellaneous		Drill Guides	Various
71111.06	Procedures	APA-ZZ-00750	Hazard Barrier Program	43
71111.06	Procedures	ODP-ZZ-00002	Equipment Status Control	95
71111.11Q	Procedures	ODP-ZZ-00001	Operations Department - Code of Conduct	108
71111.11Q	Procedures	ODP-ZZ-00002	Equipment Status Control	95

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.11Q	Procedures	ODP-ZZ-00014	Operational Mode Change Requirements	56
71111.11Q	Procedures	OSP-SF-00001	Shutdown Margin Calculations	48
71111.11Q	Procedures	OSP-SF-00005	Estimated Critical Position Calculation	22
71111.11Q	Procedures	OTG-ZZ-00002	Reactor Startup - IPTE	64
71111.11Q	Procedures	OTO-AE-00002	Steam Generator Water Level Control Malfunctions	13
71111.11Q	Procedures	OTO-BB-00003	RCS Excessive Leakage	27
71111.11Q	Procedures	OTO-ZZ-00001	Control Room Inaccessibility	48
71111.11Q	Procedures	OTS-ZZ-00001	Cooldown from Outside the Control Room	10
71111.11Q	Procedures	T61.08108	Simulator Training Scenario Guide S-2 Cycle 22-1	
71111.12	Corrective Action Documents	Condition Reports	201504790, 202106661, 2021006768, 202106771, 202106773, 202106774, 202106780	
71111.12	Miscellaneous	NUMARC 93-01	Industry Guidelines for Monitoring the Effectiveness of Maintenance	4F
71111.12	Procedures	APA-ZZ-00340, Appendix 1	Surveillance Frequency Control Program	3
71111.12	Procedures	APA-ZZ-00500	Corrective Action Program	71 and 75
71111.12	Procedures	APA-ZZ-00500, Appendix 14	Adverse Condition ADCN-3	42
71111.12	Procedures	APA-ZZ-00549, Appendix B	Guidelines Used to Determine Functional Importance of a Component	13
71111.12	Procedures	EDP-ZZ-01128	Maintenance Rule Program	32
71111.12	Procedures	EDP-ZZ-01128, Appendix 4	Maintenance Rule System Functions	38
71111.12	Procedures	ITP-ZZ-00004	Response Time Testing	17
71111.13	Corrective Action Documents	Condition Reports	201207322, 201207612, 201803059, 202000019	
71111.13	Miscellaneous	Fire Impairment	29570, GLD Grille Removal	12/16/2021
71111.13	Miscellaneous	NUMARC 93-01	Industry Guidelines for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants	4F
71111.13	Miscellaneous	Risk Profile, January 2 - 8, 2022		
71111.13	Procedures	APA-ZZ-00322, Appendix F	Online Work Integrated Risk Management	22

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.13	Procedures	APA-ZZ-01250	Operational Decision Making	18
71111.13	Procedures	EDP-ZZ-01128, Appendix 1	SSCs in the Scope of the Maintenance Rule at Callaway	11
71111.13	Procedures	ODP-ZZ-00002	Equipment Status Control	95
71111.13	Procedures	ODP-ZZ-0002, Appendix 2	Risk Management Actions for Planned Risk Significant Activities	17
71111.15	Corrective Action Documents	Condition Report	202005988, 202200072, 202200366, 202200375, 202200788, 202200942	
71111.15	Miscellaneous	8618-X-94742	Switchyard Relay Panel	
71111.15	Miscellaneous	GL-19	Auxiliary Building 2026' Cooler Failure GOTHIC Analysis	Various
71111.15	Procedures	APA-ZZ-00340	Surveillance Program Administration	37
71111.15	Procedures	APA-ZZ-00750	Hazard Barrier Program	48
71111.15	Procedures	ODP-ZZ-00002	Equipment Status Control	95
71111.15	Procedures	OSP-EF-P0001B	Essential Service Water Train B Inservice Test	72
71111.18	Corrective Action Documents	Condition Reports	101607603, 202001972, 202006423	
71111.18	Procedures	APA-ZZ-00115	SAMG Writers Guide	30
71111.19	Corrective Action Documents	Condition Reports	19900011, 200503123, 200503150, 201403339, 202201212, 202201240	
71111.19	Miscellaneous	E-1061	120V AC Bus Inverter and Swing Inverter	
71111.19	Procedures	MTE-GK-QC001	Control Room and Class 1E Air Conditioning Unit Charging	13
71111.19	Procedures	OTN-EG-00001	Component Cooling Water System	62
71111.19	Procedures	OTN-NN-000001, Addendum 1	Inverter Inservice Verification	
71111.19	Work Orders		21507708, 20501759	
71111.22	Corrective Action Documents	Condition Reports	202000691, 2020006986, 202103948, 202106533, 202200124	
71111.22	Miscellaneous	M-240	Seismic Qualification	
71111.22	Procedures	APA-ZZ-00340	Surveillance Program Administration	50
71111.22	Procedures	APA-ZZ-00356	Pump & Valve IST Program	28
71111.22	Procedures	EDP-ZZ-02222	Vibration Predictive Maintenance Program	25
71111.22	Procedures	M-712-00068	Reactor Coolant Pump Manual	45
71111.22	Procedures	OSP-EJ-P001A	RHR Train A Inservice Test	3

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.22	Procedures	OSP-NE-0001A	Standby Diesel Generator A Periodic Tests	68
71111.22	Procedures	OSP-NE-0001B	Standby Diesel Generator B Periodic Tests	69
71111.22	Work Orders		21507645, 21512440, 21511979, 19502238, 21511945	
71114.04	Miscellaneous	Letter from Robert E. Kahler, Nuclear Regulatory Commission, to Bruce C. Foreman, Federal Emergency Management Agency	Request for Assistance to Address a Concern Regarding Callaway Plant Alert and Notification System Siren Design Change	11/18/2021
71114.04	Miscellaneous	Letter from Thomas K. Warnock, Federal Emergency Management Agency, to Michael McCoppin, Nuclear Regulatory Commission	Callaway Energy Center Alert and Notification System Siren Design Change	2/4/2022
71151	Miscellaneous		2021 NRC Performance Indicator Transmittal Report, First Quarter	
71151	Miscellaneous		2021 NRC Performance Indicator Transmittal Report, Second Quarter	
71151	Miscellaneous		2021 NRC Performance Indicator Transmittal Report, Third Quarter	
71151	Miscellaneous		2021 NRC Performance Indicator Transmittal Report, Fourth Quarter	
71152A	Corrective Action Documents	Condition Reports	20216981, 202201243	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152A	Procedures	APA-ZZ-00500	Corrective Action Program	75
71152A	Procedures	APA-ZZ-00750	Hazard Barrier Program	48
71153	Corrective Action Documents	Condition Reports	202200154, 202200163	
71153	Procedures	ISF-SB-00A32	SSPS Train B Functional Test	36
71153	Procedures	OSP-SB-0001B	Reactor Trip Breaker B Trip Actuating Device Operational Test	20