

**From:** [Nirodh Shah](#)  
**To:** [Miller, Chelsie A:\(Constellation Nuclear\)](#); [Evans, Natalie A:\(Constellation Nuclear\)](#)  
**Cc:** [Jeffery Steward](#); [Stephanie Liska](#); [Robert Ruiz](#)  
**Subject:** Request for Information for Clinton Biennial Problem Identification and Resolution Inspection (PIR)  
**Date:** Monday, February 26, 2024 12:12:00 PM  
**Attachments:**

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Hi Chelsie! As we had discussed earlier, the biennial PI&R inspection will occur between April 8-26, 2024. Besides I, the team members include Stephanie Liska and Jeremy Steward. I have attached the request for information to support the inspection.

Unless otherwise stated, the time frame for the requested materials should be for the period starting January 1, 2022, until February 29, 2024. For requested lists please provide the information, if possible, in a "sortable" Excel spreadsheet format. Unless otherwise stated, the information request should include all major plant departments (i.e., operations, engineering, maintenance, radiation protection, security, and emergency preparedness).

Please provide the information by March 15, 2024, to facilitate the selection of specific items that will be reviewed during the onsite inspection week. If you maintain a remote site (i.e., SharePoint, One Drive, etc.) please upload all documents to that location and provide all team members with access to that site. If you don't maintain a remote site, please mail the information to me in a CD or DVD format.

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If you have any questions, please contact me.

Thx...N. Shah  
Senior Project Engineer  
Reactor Projects Branch 1  
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**INFORMATION REQUEST FOR THE CLINTON PROBLEM IDENTIFICATION AND  
RESOLUTION INSPECTION**

(a) **PROGRAM DOCUMENTS**

1. A current copy of administrative procedure(s) for the corrective action program (CAP), quality assurance (QA) audit program, self-assessment program, corrective action effectiveness review program, trending program, industry operating experience review program, maintenance rule program and top-level documents for the work control programs, work scheduling programs, and aging management program(s).
2. A current copy of the Employee Concerns Program (ECP)/Ombudsman administrative procedure(s).
3. A copy of the QA manual.
4. Description of any substantive changes made to the corrective action program philosophy or operation since the last biennial PI&R Inspection. Please include with each listed substantive change the effective date of the change. Administrative and non-substantive changes do not need to be listed.

(b) **CAP EFFECTIVENESS—PROBLEM IDENTIFICATION**

5. OPEN Condition Reports (CRs) – A list of all open CRs sorted by significance level. Include CR number, the date initiated, a brief description/title, system affected if any, significance level, and anticipated completion date, if available. This list should be grouped by responsible department and listed in order of initiation date (oldest listed first).
6. CORPORATE CRs – A list of CRs generated by the corporate office that involve or affect plant operation, sorted by significance level. Include the date initiated, a brief description/title, site(s) affected, system affected, significance/priority level, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed).
7. CR GENERATION – A data table (or similar format) showing the total number of CRs generated per year, sorted by department (i.e., operations, engineering, security etc.) since 2022.
8. EXTERNAL CR NUMBERS – A data table showing the number of issues identified externally (NRC, INPO, other, etc.) per year as compared to internally since 2022.
9. PLANT TRANSIENTS – A list of plant trips, unplanned down powers (greater than 20 percent), limiting condition for operation entries (not scheduled), and licensee event reports, including dates of these events.
10. CONTROL ROOM DEFICIENCIES – A list of current control room deficiencies and operator work-arounds, sorted by priority, with a brief description/title and corresponding CR and/or work order number.

(c) **CAP EFFECTIVENESS—PROBLEM PRIORITIZATION AND EVALUATION**

11. ROOT CAUSES – A list of completed root cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the root cause package, to the documents and/or CRs directing and tracking the actions.

12. APPARENT CAUSES – A list of completed apparent cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the apparent cause package, to the documents and/or CRs directing and tracking the actions.
13. CLOSED CRs – A list of closed CRs sorted by significance level and then initiation date. Include CR number, a brief description/title, the significance level, the date initiated and closed, assigned organization, and system affected.
14. OPERABILITY EVALUATIONS – A list of operability evaluations. Include a brief description/title of the issue, date initiated, date closed, or date anticipated to be closed. Include any operability evaluations that are still open regardless of the date initiated.
15. MAINTENANCE RULE – A listing of all systems which were in Maintenance Rule a(1) status since 2022, even if no longer in that status. Include dates when system/components entered (a)(1) status and, if applicable, returned to (a)(2) status. Provide copies of the applicable system health report sections and maintenance rule action plans for those systems.
16. IN SERVICE TESTING (IST) – A list of test failures (IST or Technical Specifications surveillances) with a brief description of component/system failed. Indicate if the failure was a maintenance preventable failure.
17. TEMPORARY MODIFICATIONS – A list of temporary modifications with a brief description of the modification, installation date, and date closed or anticipated closure date.

(d) CAP EFFECTIVENESS—CORRECTIVE ACTIONS

18. OPEN ACTIONS – A list of open corrective actions, sorted by significance/priority level, with a brief description/title, initiating date and due date. The list should include the number of due date extension and be grouped by the responsible department.
19. EFFECTIVENESS REVIEWS – A list of completed effectiveness reviews with a brief description of the results. Include a cross-reference to the CRs for which the effectiveness review was conducted and, if applicable, CR numbers documenting any additional follow-up actions.
20. INADEQUATE ACTIONS – A list of CRs initiated for inadequate or ineffective corrective actions. Include the date initiated, a brief description/title, significance/priority level, system affected, assigned organization, and status (if closed, include date closed; if open, include scheduled date to be closed). Include a cross-reference to the CR or evaluation that generated the original corrective action.
21. REWORK – A list of rework items and repeat failures. Include cross-references to applicable Work Orders and CRs.
22. OPEN WORK ORDERS – A list of open work orders/equipment work requests with a brief description. Identify the work order as outage or non-outage, the date of initiation and scheduled or anticipated closure date, if available. If applicable, also provide the classification of the work orders with the recent industry classification scheme. Provide an explanation of the classification scheme and the procedure governing the classification. Work requests/work orders not associated with a degraded equipment condition (e.g., work orders for voluntary plant upgrades) and those associated with routine surveillance activities or preventative maintenance tasks do not have to be included in the list.

(e) CAP ASSESSMENT – PROBLEM IDENTIFICATION

- 23. QA AUDITS – A copy of QA audits of the corrective action program.
- 24. PI&R ASSESSMENT – A copy of self-assessments and associated condition reports generated in preparation for this PI&R inspection.
- 25. CAP SELF-ASSESSMENTS – A copy of completed CAP self-assessments and the plan/schedule for future CAP self-assessments.
- 26. CAP PERFORMANCE INDICATORS – A copy of any performance reports or indicators used to track CAP effectiveness for the past 24 months. The most recent data and end-of-quarter data will suffice; monthly reports are not required.

(f) CAP ASSESSMENT – CORRECTIVE ACTIONS

- 27. TREND REPORTS – Copies of any completed trend reports for CRs. Quarterly trend reports are acceptable; copies of all monthly reports are not required.
- 28. TREND CRs – A list of CRs initiated for trends of conditions adverse to quality. Include the date initiated, a brief description/title, significance/priority level, and status (if closed include date closed; if open, include scheduled date to be closed).
- 29. WORK ORDER TRENDS – A copy of any trend reports for work orders. The most recent trend reports and those that existed at the end-of-year and middle-of-year are acceptable; copies of monthly reports are not required. Include a copy of a recent (within 2 months of the data submittal) graph or document showing the status of work week planning of work activities.

(g) USE OF OPERATION EXPERIENCE (OP EX)

- 30. OP EX CRs: 1) A list of CRs initiated to evaluate NRC generic communications (e.g., bulletins, information notices, generic letters, etc.). 2) A list of CRs initiated to evaluate industry generic communications (industry operating experience, fleet operating experience, etc.). For both lists, include the date the CR was initiated, a brief description/title, and the status (if closed, include date closed; if open, include scheduled date to be closed).

(h) SELF-ASSESSMENT AND AUDITS

- 31. QA AUDITS – A list of all other QA audits completed with a brief description of areas where findings were identified.
- 32. QA AUDIT SCHEDULE – The schedule of future QA audits.
- 33. SELF-ASSESSMENTS – A chronological list of department and site self-assessments completed (include date completed).
- 34. A list of any audit or assessment performed by an outside agency/industry group (excepting the NRC or INPO). Please include the audit no., title and date performed.
- 35. SELF-ASSESSMENT CAPS – A list of CRs written for findings or concerns identified in self-assessments and audits. Include a short description/title of the finding, its status, and include a cross-reference to the audit or self-assessment number.

(i) SAFETY CONSCIOUS WORK ENVIRONMENT

36. SAFETY CONSCIOUS WORK ENVIRONMENT ASSESSMENTS – Copy of the results of safety culture and/or SCWE surveys or self-assessments. Include any organizational effectiveness surveys conducted by internal or external organizations. Include a listing of any action(s) resulting from the survey(s) and the status of the action(s).

37. ECP ISSUES – SCWE issues identified through alternate avenues, such as the employee concerns programs. If issue(s) are considered sensitive, in lieu of describing issue in the data package, provide a paper copy to the lead inspector at the start of the inspection.

(j) REGULATORY ISSUES - REVIEWED FOR ALL ASPECTS OF THE CAP PROGRAM

38. NRC FINDING CAPS – A list of CRs for issues (findings, violations, etc.) documented in NRC inspection reports. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed).

39. LICENSE IDENTIFIED VIOLATION CAPS – A list of CRs for licensee identified violations that have been documented in NRC inspection reports. Include the CR number, brief description/title, date initiated and the status (if closed, include date closed; if open, include scheduled date to be closed).

(k) NRC ISSUES CAPS – A list of CRs associated with NRC-identified issues. Include the CR number, brief description/title, date initiated and the status (if closed, include date closed; if open, include scheduled date to be closed).

(l) 5-YEAR REVIEW – Please provide a list of the following CAP items pertaining to the Essential Service Water system for all trains since January 1, 2019. Please sort the information by train.

40. CONDITION REPORTS – A list of CRs, include the CR number, brief description/title, significance level, level of evaluation (i.e., root cause, apparent cause, common cause, etc.), date initiated, and the status (if closed, include date closed; if open, include scheduled date to be closed).

41. OPERATING EXPERIENCE – A list of evaluations conducted on applicable internal and external industry operating experience.

42. ASSESSMENTS – a list of key issues being tracked either by the Plant Health Committee, System Health Report, or similar; a summary of maintenance rule scoping classification and performance monitoring criteria; any audits/evaluations performed whether internal or external and a copy of the most recent system health report or similar document.

43. List of open/closed operability evaluations (open or closed), ASME code evaluations/repairs; maintenance rule failure evaluations; or Adverse Condition Monitoring plans performed for any of the documented issues.

Please also arrange for the team to have access to the following documents while on site:

- a. Updated Final Safety Analysis Report.
- b. Technical Specifications.
- c. Procedures and procedure index.
- f. A list of the codes used in the CAP and Work Orders system(s).

Other:

On the first day of the inspection, or early on the second day, please provide the inspection team a briefing of your CAP including an overview of your actions, if any, associated with recent industry efforts to improve the efficiency of the CAP (e.g., cumulative effects initiative). Include your expectations for personnel using the program and how the work order system fits into the overall scheme for addressing identified issues. Also, please demonstrate how to use a computer to access CAP data.

The lead inspector will also request to talk to/interview plant personnel to seek information about the plant's SCWE. The lead inspector will discuss with your staff the protocol and format of the interviews, whether impromptu or scheduled individuals or groups. For this the inspector will need access to organizations charts showing position titles and names.

