

October 23, 2000

EA-00-218

Mr. Guy G. Campbell
Vice President - Nuclear
FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION - NRC INSPECTION
REPORT 50-346/00-10(DRP)

Dear Mr. Campbell:

On September 30, 2000, the NRC completed an inspection at your Davis-Besse reactor facility. The results were discussed with you and other members of your staff on September 27. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC identified two issues which were categorized as being of very low safety significance. These issues have been entered into your corrective action program and are discussed in the summary of findings and in the body of the attached inspection report. Both of these issues were determined to involve a violation of NRC requirements, but because of their very low safety significance and the issues have been entered into your corrective action program, the violations are not cited. If you contest these Non-Cited Violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with a copy to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-001; and the NRC Resident Inspector at the Davis-Besse facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the *Publicly Available Records (PARS) component of NRC's*

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-2-

document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Thomas J. Kozak, Chief
Reactor Projects Branch 4

Docket No. 50-346
License No. NPF-3

Enclosure: Inspection Report 50-346/00-10(DRP)

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-3-

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-346
License No: NPF-3

Report No: 50-346/00-10(DRP)

Licensee: FirstEnergy Nuclear Operating Company

Facility: Davis-Besse Nuclear Power Station

Location: 5501 N. State Route 2
Oak Harbor, OH 43449-9760

Dates: August 16 - September 30, 2000

Inspectors: K. Zellers, Senior Resident Inspector
D. Simpkins, Resident Inspector
G. Larizza, Resident Inspector, Fermi

Approved by: Thomas J. Kozak, Chief
Reactor Projects Branch 4
Division of Reactor Projects

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

- ! Initiating Events
- ! Mitigating Systems
- ! Barrier Integrity
- ! Emergency Preparedness

Radiation Safety

- ! Occupational
- ! Public

Safeguards

- ! Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

IR 50-346/00-10(DRP), on 08/16-9/30/2000; FirstEnergy Nuclear Operating Company; Davis-Besse Nuclear Power Station; Maintenance Rule Implementation; Event Followup.

The inspection was conducted by resident inspectors. This inspection identified two green issues, both of which were Non-Cited Violations. The significance of issues is indicated by their color (GREEN, WHITE, YELLOW, RED) and was determined by the Significance Determination Process.

Cornerstone: Mitigation Systems

- GREEN. An equipment operator caused an auxiliary feedwater pump to be inoperable for about 1 week when he failed to close a trip throttle valve drain valve. This was a Non-Cited Violation of a Technical Specification allowed outage time.

The risk significance of this issue was very low because redundant auxiliary feedwater equipment was available, resulting in a very low probability that auxiliary feedwater would not have been able to perform its design function when called upon.

- GREEN. The licensee did not adequately scope the Makeup Pump Room Air Conditioner for entry into the Maintenance Rule Program. This was a Non-Cited Violation of 10 CFR 50.65, Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants.

The risk significance of this issue was very low because redundant systems were available for decay heat removal purposes.

Report Details

Summary of Plant Status: The plant was operated at about 100 percent power throughout the inspection period, except for brief down powers to about 90 percent power for testing activities or low system demand.

1. **REACTOR SAFETY**

1R04 Equipment Alignment (Inspection Procedure 71111.04)

a. Inspection Scope

The inspectors conducted partial walk-down inspections by comparing station configuration control documentation with actual system/train lineups on the following trains of equipment to verify the system/train was operable when a redundant system/train was out-of-service:

- Emergency Diesel Generators #1 and #2 during an outage of the Station Blackout Diesel Generator (documents reviewed: unit log, test completion log, Davis-Besse Material Condition Report, Operations Schematics (OS) OS-041A-F, Piping and Instrumentation Diagrams (P&ID) M-017A-D, DB-OP-02521, Updated Safety Analysis Report (USAR) Sections 8.0, and 8.3 and Technical Specification (TS) 3.8.1)
- Emergency Diesel Generator #2 during an outage of Emergency Diesel Generator #1 (documents reviewed: unit log, test completion log, Davis-Besse Material Condition Report, OS-041A-C, M-017A-C, USAR Sections 8.0, and 8.3 and TS 3.8.1)

The inspectors conducted a complete walk-down inspection of the Decay Heat Removal System, a risk-important mitigating system, after considering the station Updated Probabilistic Safety Assessment, plant mode, and previous walk-downs. Items inspected were: correct system lineup in accordance with configuration control documentation; appropriateness of related operating, abnormal, and emergency procedures; compliance with the updated final safety analysis report and vendor manual recommendations; outstanding material deficiencies and their effect on system operability; outstanding design issues including temporary modifications; any operator workarounds; and items tracked by the engineering department. Documents reviewed were: OS-003, OS-004, M-033A-C, Davis-Besse Material Condition Report, USAR Section 6.3 and DB-OP-2000.

b. Findings

There were no findings identified.

1R05 Fire Protection (Inspection Procedure 71111.05)

a. Inspection Scope

The inspectors verified adequate fire protection program implementation by observing a fire brigade drill. Elements inspected were: protective clothing properly donned, fire hoses used appropriately, fire area entered in a controlled manner, sufficient equipment to fight the fire brought to the scene, effective command and control of the fire brigade, fire fighting pre-plan strategies were utilized, drill scenario followed and drill objectives met. Documents reviewed were the Pre-Fire Plan, the Fire Hazards Analysis Report, DB-FP-00005 and the drill scenario summary.

b. Findings

There were no findings identified.

1R07 Heat Sink Performance (Inspection Procedure 71111.07)

a. Inspection Scope

The inspectors observed the performance of the Component Cooling Water System Heat Exchanger #3 testing. The inspectors reviewed the test to determine if: test acceptance criteria and results appropriately considered differences between test conditions and design conditions, acceptance criteria was appropriately compared to the test results, the frequency of inspection was sufficient to detect degradation prior to loss of heat removal capabilities below design basis values, and that test results considered test instrument inaccuracies and differences. Documents reviewed were DB-PF-04706, OS-21, M-036B-C, and TS 3.7.3.

b. Findings

There were no findings identified.

1R11 Licensed Operator Regualification Program (Inspection Procedure 71111.11)

a. Inspection Scope

The inspectors observed high risk licensed operator actions and emergency plan implementation for simulator scenarios to identify deficiencies and discrepancies in the training, and to assess operator performance and evaluator critiques. These observations included steam generator tube leaks and ruptures with equipment problems and radioactive releases to the environment. Documents reviewed were the drill scenario and DB-OP-2000.

b. Findings

There were no findings identified.

1R12 Maintenance Rule Implementation (Inspection Procedure 71111.12)

a. Inspection Scope

The inspectors reviewed the licensee's implementation of the maintenance rule requirements, including a review of scope, goal setting, and performance monitoring, short-term and long-term corrective actions, and current equipment performance status, for the following components and systems that have had performance problems:

- Boric Acid Addition Tank Room Door (document reviewed: Maintenance Rule Program Manual)
- Makeup Pump Room Air Conditioning System (documents reviewed: DB-OP-02000, "RPS, SFAS, SFRCS Trip of SG Tube Rupture," Davis-Besse Probabilistic Safety Update, USAR, Maintenance Rule Program Manual, Intra-Company Memorandum P. Jacobsen to J. Nevshemal dated July 20, 1989, "Makeup Pump Qualification" NED 89-30244, Serial Number 1836, Letter to USNRC dated September 18, 1990, Sulzer Bingham Technical Report Loss of Cooling Event, EXT-89-05683, and System Description (SD) SD-048, "Makeup and Purification System")
- Reactor Protection System (documents reviewed: Davis-Besse Material Condition Report, the Maintenance Rule Program Manual, Condition Reports 91-0032, 94-0453, 96-0294, 00-0128, 00-0568, 00-1485, 00-1994, Clare REMtech vendor manual, SD-044 and DB-OP-06403)
- Decay Heat Removal System (documents reviewed: Davis-Besse Material Condition Report, the Maintenance Rule Program Manual, Piping and Instrumentation Diagrams M-033A-C, USAR Section 6.3 and DB-OP-2000)

b. Findings

The makeup pump room air conditioning system had four maintenance preventable functional failures (MPFFs) in the previous operating cycle and it was relied upon to function properly in the station emergency operating procedure (EOP). However, the licensee did not include this system within the scope of the maintenance rule. This is a non-cited violation of the maintenance rule scoping criteria.

The makeup pump room air conditioning system is relied upon to operate when two makeup pumps are operating to maintain makeup pump room temperature such that makeup pump motor bearings will not overheat and fail. Two makeup pump operation is directed by the station EOP for feed-and-bleed operations in the event of a loss-of-all-feedwater event. The emergency procedure directs that operators initially check to make sure the makeup pump air conditioner is working prior to starting feed and bleed operations. If the air conditioning system is not working, the procedure directs that the makeup pump room door be blocked open to provide sufficient room cooling to prevent motor bearing damage. However, if the air conditioning unit is initially working, the door is not opened and the air conditioning system is then relied upon to provide cooling for the room to prevent motor bearing damage. If the air conditioner subsequently failed, operators would not likely detect the loss of room cooling before bearing damage occurred. The inspectors reviewed the station maintenance rule program manual and determined the licensee had not included the makeup pump air conditioning system in the scope of the maintenance rule program.

This is more than a minor problem because the maintenance rule was not used effectively to address multiple MPFFs of the makeup pump room air conditioning system. This problem had very low risk-significance because redundant systems were available for decay heat removal purposes (GREEN).

10 CFR 50.65 (b)(2) requires, in part, that the scope of the monitoring program specified in paragraph (a)(1) shall include nonsafety-related structures, system, and components (SSCs) that are relied upon to mitigate accidents or transients or are used in plant emergency operating procedures. Contrary to the above, as of August 15, 2000, the licensee failed to include the makeup pump room air conditioning system within the scope of the monitoring program specified in 10 CFR 50.65 (a)(1). Since this issue was determined to have very low safety significance and was characterized as Green by the SDP, this violation is being treated as a Non-Cited Violation, consistent with Section VI.A.I of the NRC Enforcement Policy (**NCV 50-346-00-10-01**). This violation is in the licensee's corrective action program as Condition Report (CR) 2000-1928.

1R13 Maintenance Risk Assessments and Emergent Work Control (Inspection Procedure 71111.13)

a. Inspection Scope

The inspectors evaluated the effectiveness of the risk assessments performed before maintenance was conducted on SSCs, verified how risk was managed, and verified if maintenance risk assessments and emergent work problems were adequately identified and resolved for the following activities:

- Reactor Protection System Channel #1/CRD Breaker (documents reviewed: weekly risk summary for August 21-26, 2000, RPS vendor technical manuals and circuit schematics, Administrative Work Process Guideline Manual and Key Work and Surveillances for the Week of August 21, 2000)
- Station Blackout Diesel Generator outage (documents reviewed: weekly risk summary for August 21-26, 2000, Administrative Work Process Guideline Manual and Key Work and Surveillances for the Week of August 21, 2000)
- Emergency Diesel Generator #1 outage (documents reviewed: weekly risk summary for September 18-22, 2000, and Key Work and Surveillances for the Week of September 18, 2000)

b. Findings

There were no findings identified.

1R14 Personnel Performance During Nonroutine Plant Evolutions and Events (Inspection Procedure 71111.14)

a. Inspection Scope

The inspectors reviewed personnel actions during an unanticipated reactor power change on August 27, 2000. This review was to determine if personnel actions were appropriate to the event and in accordance with procedures and training. Documents reviewed included CR 2000-2099, the unit log and plant computer point logs.

b. Findings

There were no findings identified.

1R15 Operability Evaluations (Inspection Procedure 71111.15)

a. Inspection Scope

The inspectors reviewed the following operability evaluations affecting mitigating systems and barrier integrity. The reviews considered whether the evaluations were technically justified, the adequacy and functionality of any compensatory measures, and any degradations that might cause a loss of function as described in the USAR or Technical Specifications.

- Borated Water Storage Tank level indicators after recalibration. (documents reviewed: instrument calibration data sheets, CR 2000-2140, Calculation C-ICE-048.01-004 and Technical Specification 3.5.4)
- Power Operated Relief Valve after relay failure. (document reviewed: vendor circuit schematics)
- Reactor Protection System mercury wetted relay switch failures (documents reviewed: Davis-Besse Material Condition Report, Condition Reports 91-0032, 94-0453, 96-0294, 00-0128, 00-0568, 00-1485, 00-1994, Clare REMtech vendor manual and SD-044)

b. Findings

There were no findings identified.

1R16 Operator Workarounds (Inspection Procedure 71111.16)

a. Inspection Scope

The inspectors reviewed operator workarounds for cumulative effects on: reliability, availability, potential mis-operation of a system, initiating event frequencies which could affect multiple mitigating systems, and the ability of operators to respond in a correct and timely manner to plant transients and accidents. Documents reviewed were the Work Process Guideline (WPG-2), an operator workaround recommendation for a sticking electro-hydraulic control increase button, and an operator workaround recommendation for a backup turbine plant cooling water supply valve (CT2955) that auto closes when opened from the control room and the operator burden list.

b. Findings

There were no findings identified.

1R19 Post-Maintenance Testing (Inspection Procedure 71111.19)

a. Inspection Scope

The inspectors verified that the post-maintenance test procedures and test activities were adequate to verify system operability and functional capability for the following risk significant systems:

- Station Blackout Diesel Generator after an outage. (Documents reviewed: Maintenance Work Orders (MWOs) 99-005501-000, 99-006343-000, 00-002673-000, 00-000621-000, and 00-000618-000)
- Borated Water Storage Tank Level Technical Specification change. (Documents reviewed: DB-MI-03143, DB-MI-03147, DB-SC-03112, DB-OP-03006, DB-CH-03004, CR 2000-2109, MWO 00-003320-002, Modification 97-0063-00, and TSs 3.3.2.1, 3.3.3.6, and 3.5.4)
- Emergency Diesel Generator #1 after an outage. (Documents reviewed: DB-ST-3076 and the unit log)
- Reactor Trip Module 1-2-2-7 replacement. (Documents reviewed: MWO-00-003685-000 and DB-MI-03011)

b. Findings

There were no findings identified.

1R22 Surveillance Testing (Inspection Procedure 71111.22)

a. Inspection Scope

The inspectors verified by witnessing the following surveillance tests and/or reviewing the test data that the subject risk-significant SSCs met TS, updated safety analysis report, and licensee procedure requirements and demonstrated that the SSCs were capable of performing their intended safety functions. The inspectors evaluated the following tests for preconditioning, effect of the test on plant risk, clear and adequate acceptance criteria, operator procedural adherence, test data completeness, test frequency, test equipment range and accuracy, and post test equipment restoration:

- Auxiliary Feedwater Train 2 Level Control, Interlock and Flow Transmitter Test (Documents reviewed: DB-SP-03161, Technical Specification 3/4.7.1.2 and USAR 9.2.7)
- Steam and Feedwater Rupture Control System Actuation Channel 2 Steam Generator Differential Pressure Inputs (Documents reviewed: USAR 7.4.1.3, Schematic Drawing E-18, SD-010, DB-MI-03204 and TS 3/4.3.2.2)
- Station Blackout Diesel Battery Capacity Test. (Document reviewed: DB-ME-4008)

b. Findings

There were no findings identified.

1R23 Temporary Plant Modifications (Inspection Procedure 71111.23)

a. Inspection Scope

The inspectors reviewed Temporary Modification 00-0009, which installed jumpers to relocate a slide link for breaker cubicle AC101, to verify that it did not affect the safety functions of important safety

systems. The inspectors reviewed the temporary modification and the associated 10 CFR 50.59 screening against the system design basis documentation, including the Updated Safety Analysis Report and Technical Specifications to verify that the modification did not affect system operability/availability. The inspectors also verified that the temporary modification was consistent with plant documentation and procedures. Documents reviewed were TS 4.3.2.1.1, TS Basis 3/4.8 and 3/4.3, USAR paragraph 1.5 and 8.3, and DB-ME-03045.

b. Findings

There were no findings identified.

1EP6 Drill Evaluation (Inspection Procedure 71114.06)

a. Inspection Scope

The inspectors evaluated the conduct of the following drills and/or simulator-based training evaluations that the licensee had determined as contributing to the drill/exercise and emergency response organization drill participation performance indicators. The inspectors observed the drills to identify weaknesses and deficiencies in classification, notification and protective action requirement development activities, to compare identified weaknesses and deficiencies against licensee identified findings to determine whether the licensee properly identified failures, and to determine whether licensee assessment of performance was in accordance with the applicable criteria.

- August 30, 2000 Emergency Preparedness Drill (Documents reviewed: Davis-Besse Nuclear Power Station Emergency Preparedness Integrated Drill Manual for July 26, August 30, and September 27, 2000, NEI 99-02 Rev 0, "Regulatory Performance Indicator Guideline," and DBNPS Emergency Preparedness Integrated Drill Report)

b. Findings

There were no findings identified.

OTHER ACTIVITIES (OA)

4OA1 Performance Indicator Verification (Inspection Procedure 71151)

a. Inspection Scope

The inspectors reviewed licensee event reports, monthly operating reports, and unit log entries to determine if the performance indicators for safety system functional failures and transients per 7000 critical hours were accurately and completely reported to the NRC by the licensee. Since this was the first time this inspection activity was conducted for these performance indicators, the previous 5 quarters of data (April 1999 - June 2000) were inspected.

b. Findings

There were no findings identified.

4OA3 Event Followup (Inspection Procedure 71153)

(Closed) LER 2000-005, (Closed) Unresolved Item 50-346-00-04-01: Main Steam Drain Valve Left Open Rendering Auxiliary Feedwater Pump Turbine Inoperable. The inspectors reviewed an event where valve MS-750, the above seat drain valve for #1 auxiliary feedwater pump turbine trip throttle valve, was found in the open position by an equipment operator. This caused the auxiliary feedwater pump to be inoperable and

unavailable for about 7 days. This was a very low risk significant Non-Cited Violation of a TS allowed outage time.

Equipment operators had been measuring auxiliary feedwater steam admission valve leakage on a weekly basis by draining downstream piping of condensed water and measuring the resultant quantity against acceptance criteria for any operability issues and to provide data to engineering personnel for trending. On June 8, an equipment operator was performing this task and found that MS-750 was open when it should have been closed. The licensee then determined that this valve had been left open for about 7 days since the last weekly draining. If the pump would have been called on to operate, high pressure steam would pass through MS-750 into the #1 auxiliary feedwater pump room, causing the pump to become non-functional due to the resulting harsh environment. Nuclear engineering personnel subsequently determined that the auxiliary feedwater pump should be considered inoperable and unavailable for the time period. No other equipment performance was affected by MS-750 being left open.

This issue was determined to be more than minor because mitigation equipment was inoperable for greater than its allowed outage time. The risk significance of this issue was very low because redundant auxiliary feedwater equipment was available which resulted in a very low probability that auxiliary feedwater would not have been able to perform its design function when called upon (Section 1R04).

Technical Specification 3.7.1.2.a states, in part, with one train of auxiliary feedwater inoperable to either or both steam generators, restore the inoperable train to operable status within 72 hours or be in hot shutdown within the next 12 hours. On June 8, 2000, the licensee had not taken actions to put the plant into hot shutdown with the #1 auxiliary feedwater pump inoperable for 7 days. This was a violation associated with an inspection finding characterized by the significance determination process as having very low risk significance (Green) and is being treated as a Non-Cited Violation, consistent with Section VI.A.I of the NRC Enforcement Policy (**NCV 50-346-00-10-02**). This violation is in the licensee's corrective action program as CR 2000-1578.

4OA5 Other (Temporary Instruction 2515/144)

a. Inspection Scope

The inspectors performed temporary instruction (TI) 2515/144, "Performance Indicator Data Collecting and Reporting Process Review." The objective of the TI was to review the licensee's performance indicator (PI) data collecting process to determine whether the licensee was appropriately implementing the NRC/Industry guidance contained in Nuclear Energy Institute (NEI) 99-02, Revision 0, "Regulatory Assessment Performance Indicator Guideline." The inspectors reviewed the licensee's PI data collecting and reporting process by reviewing the station guideline "NRC Performance Indicator Guideline," reviewing the data in the station spreadsheet program that calculated the PIs, and interviewing personnel assigned data collecting responsibilities.

b. Issues and Findings

There were no findings identified.

4OA6 Management Meeting

The inspectors presented the inspection results to Mr. G. Campbell and other members of licensee management on September 27, 2000. The licensee acknowledged the findings presented. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

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ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

50-346-00-10-01_____	NCV	failure to include the makeup pump room air conditioning system within the scope of the monitoring program specified in 10 CFR 50.65 (a)(1)
50-346-00-10-02	NCV	main steam drain valve left open rendering auxiliary feedwater pump turbine inoperable

Closed

50-346-2000-003	LER	main steam drain valve left open rendering auxiliary feedwater pump turbine inoperable
50-346-00-04-01	URI	main steam drain valve left open rendering auxiliary feedwater pump turbine inoperable

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
CR	Condition Report
CRD	Control Rod Drive
DRP	Division of Reactor Projects
EOP	Emergency Operating Procedure
LER	Licensee Event Report
MDT	Maintenance Deficiency Tag
MPFF	Maintenance Preventable Functional Failure
MWO	Maintenance Work Order
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
OS	Operations Schematic
RPS	Reactor Protection System
P&ID	Piping and Instrumentation Diagram
SFAS	Safety Features Actuation System
SFRCS	Steam and Feedwater Rupture Control System
SD	System Description
SDP	Significance Determination Process
SG	Steam Generator
SSC	Structures, Systems, and Components
TI	Temporary Instruction
TS	Technical Specification
USAR	Updated Safety Analysis Report