

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

April 23, 2014

Mr. Michael J. Pacilio President and Chief Nuclear Office Exelon Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION - STAFF ASSESSMENT OF THE SEISMIC WALKDOWN REPORT SUPPORTING IMPLEMENTATION OF NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. MF0152)

Dear Mr. Pacilio:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information letter per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter) The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tõhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for nuclear power plant licensees to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

By letter dated November 19, 2012, as supplemented by letter dated April 26, 2013, Exelon Generation Company (Exelon) submitted its Seismic Walkdown Report as requested in Enclosure 3 of the 50.54(f) letter for the Oyster Creek Nuclear Generating Station (OCNGS). In order to complete all of the walkdowns by the end of 2014, by letter dated September 16, 2013, Exelon provided additional information on the deferred walkdowns of the inaccessible items. By letter dated November 27, 2013, Exelon provided a response to the NRC request for additional information for the staff to complete its assessments.

The NRC staff acknowledges that a supplemental letter will be provided by March 31, 2015, addressing the remaining inaccessible items consistent with the regulatory commitment. The NRC staff reviewed the information provided and, as documented in the enclosed staff assessment, determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

If you have any questions, please contact me at 301-415-3100 or by e-mail at John.Lamb@nrc.gov.

Sincerely,

John G. Lamb, Senior Project Manager Plant Licensing Branch I-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-219

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Enclosure: Staff Assessment of Seismic Walkdown Report

cc w/encl: Distribution via Listserv

STAFF ASSESSMENT OF SEISMIC WALKDOWN REPORT

NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO

THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT

EXELON GENERATION COMPANY

OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-219

1.0 INTRODUCTION

On March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter) to all power reactor licensees and holders of construction permits in active or deferred status. The request was part of the implementation of lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 3, "Recommendation 2.3: Seismic,"² to the 50.54(f) letter requested licensees to conduct seismic walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions using the corrective action program (CAP), verify the adequacy of monitoring and maintenance procedures, and report the results to the NRC.

Enclosure 3 of the 50.54(f) letter requested licensees to provide the following:

- a. Information concerning the plant-specific hazard licensing bases and a description of the protection and mitigation features considered in the licensing basis evaluation.
- b. Information related to the implementation of the walkdown process.
- c. A list of plant-specific vulnerabilities . . . identified by the IPEEE [Individual Plant Examination of External Events] and a description of the actions taken to eliminate or reduce them . . .
- d. Results of the walkdown including key findings and identified degraded, nonconforming, or unanalyzed conditions . . .
- e. Any planned or newly installed protection and mitigation features.
- f. Results and any subsequent actions taken in response to the peer review.

In accordance with the 50:54(f) letter, Enclosure 3, Required Response Item 2, licensees were required to submit a response within 180 days of the NRC's endorsement of the seismic

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340.

² ADAMS Accession No. ML12056A049.

walkdown process. By letter dated May 29, 2012,³ the Nuclear Energy Institute (NEI) staff submitted Electric Power Research Institute (EPRI) document 1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," (walkdown guidance) to the NRC staff to consider for endorsement. By letter dated May 31, 2012,⁴ the NRC staff endorsed the walkdown guidance.

By letter dated November 19, 2012,⁵ Exelon Generation Company (the licensee) provided a response to Enclosure 3 of the 50.54(f) letter Required Response Item 2, for Oyster Creek Nuclear Generating Station (OCNGS). In addition to the aforementioned letter, the licensee, by letter dated April 26, 2013,⁶ provided an amendment to its initial walkdown report. The purpose of the latter submittal was to provide walkdown results for those components that were inaccessible during the initial walkdowns. By letter dated September 16, 2013,⁷ the licensee updated its commitment for completing the delayed inspection of one inaccessible item by December 31, 2014, and to submit the final updated walkdown report by March 31, 2015. The NRC staff reviewed the initial walkdown report and determined that additional supplemental information would assist the staff in completing its review. In letter dated November 1, 2013,⁸ the NRC staff requested additional information to gain a better understanding of the processes and procedures used by the licensee in conducting the walkdowns and walk-bys. The licensee responded to the NRC staff request by letter dated November 27, 2013.⁹

The NRC staff evaluated the licensee's submittals to determine if the information provided in the walkdown report met the intent of the walkdown guidance and if the licensee responded appropriately to Enclosure 3 of the 50.54(f) letter.

2.0 REGULATORY EVALUATION

The structures, systems, and components (SSCs) important to safety in operating nuclear power plants are designed either in accordance with, or meet the intent of Appendix A to 10 CFR Part 50, "General Design Criteria for Nuclear ower Plants," Criterion 2: "Design bases for protection against natural phenomena;" and Appendix A to 10 CFR Part 100, "Reactor Site Criteria." Criterion 2 states that SSCs important to safety at nuclear power plants shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions.

For initial licensing, each licensee was required to develop and maintain design bases that, as defined by 10 CFR 50.2, identify the specific functions that an SSC of a facility must perform, and the specific values or ranges of values chosen for controlling parameters as reference bounds for the design.

³ ADAMS Package Accession No. ML121640872.

⁴ ADAMS Accession No. ML12145A529.

⁵ ADAMS Accession No. ML123590007.

⁶ ADAMS Accession No. ML13120A185.

⁷ ADAMS Accession No. ML13260A083.

⁸ ADAMS Accession No. ML13304B418.

⁹ ADAMS Accession No. ML13331B501.

The design bases for the SSCs reflect appropriate consideration of the most severe natural phenomena that have been historically reported for the site and surrounding area. The design bases also reflect sufficient margin to account for the limited accuracy, quantity, and period of time in which the historical data have been accumulated.

The current licensing basis is the set of NRC requirements applicable to a specific plant, including the licensee's docketed commitments for ensuring compliance with, and operation within, applicable NRC requirements and the plant-specific design basis, including all modifications and additions to such commitments over the life of the facility operating license.

3.0 TECHNICAL EVALUATION

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3.1 Seismic Licensing Basis Information

The licensee provided information on the plant-specific licensing basis for the Seismic Category I SSCs for OCNGS in Section 2.0 of the walkdown report. Consistent with the walkdown guidance, the NRC staff noted that the report includes a summary of the Safe Shutdown Earthquake (SSE) and a description of the codes, standards, and methods that were used in the design of the Seismic Category I SSCs for meeting the plant-specific seismic licensing basis requirements. The NRC staff reviewed Section 2.0 of the walkdown report, focusing on the summary of the SSE and the design codes used in the design.

Based on its review, the NRC staff concludes that the licensee has provided information on the plant-specific seismic licensing basis and a description of the protection and mitigation features considered in the licensing bases evaluation consistent with Section 8, Submittal Report, of the walkdown guidance.

3.2 Seismic Walkdown Methodology Implementation

Section 2, Personnel Qualifications; Section 3, Selection of SSCs; Section 4, Seismic Walkdowns and Area Walk-Bys; and Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance (EPRI Document 1025286) provide information to licensees regarding the implementation of an appropriate seismic walkdown methodology.

By letter dated July 10, 2012,¹⁰ the licensee confirmed that it would use the walkdown guidance in the performance of the seismic walkdowns at OCNGS. The walkdown report dated November 19, 2012, and supplemented on April 26, 2013, did not identify deviations from the walkdown guidance.

The NRC staff reviewed the following sections of the walkdown methodology implementation provided in the walkdown report:

- Personnel Qualifications
- Development of the Seismic Walkdown Equipment Lists (SWELs)

¹⁰ ADAMS Accession No. ML12193A081.

- Implementation of the Walkdown Process
- Licensing Basis Evaluations and Results

3.2.1 Personnel Qualifications

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Section 2, Personnel Qualifications, of the walkdown guidance provides licensees with qualification information for personnel involved in the conduct of the seismic walkdowns and area walk-bys.

The NRC staff reviewed the information provided in Section 3, Table 3.1, Annex A, Section A3 and Table A3-1 of the amended walkdown report, which includes information on the walkdown personnel and their qualifications. Specifically, the staff reviewed the summary of the background, experience, and level of involvement for the following personnel involved in the seismic walkdown activities: equipment selection personnel, seismic walkdown engineers (SWEs), licensing basis reviewers, IPEEE reviewers, peer review team, and operations staff.

Based on the review of the licensee's submittals, the NRC staff concludes that those involved in the seismic walkdown activities have the appropriate seismic background, knowledge and experience, as specified in Section 2 of the walkdown guidance.

3.2.2 Development of the SWELs

Section 3, Selection of SSCs, of the walkdown guidance provides information to licensees for selecting the SSCs that should be placed on the SWELs, so that they can be walked down by gualified personnel.

The NRC staff reviewed the overall process used by the licensee to develop the OCNGS base list, SWEL 1 (sample list of designated safety functions equipment), and SWEL 2 (sample list of spent fuel pool related equipment). The licensee provided the base list, SWEL 1 and SWEL 2 in Appendix B of the walkdown report and discussed these lists in Section 4 of the walkdown report.

The overall equipment selection process followed the screening process shown in Figures 1-1 and 1-2 of the walkdown guidance. Based on Appendix B of the walkdown report, OCNGS SWEL 1 and 2 meet the inclusion requirements of the walkdown guidance. Specifically, the following attributes were considered in the sample selection:

- A variety of systems, equipment and environments
- IPEEE equipment
- Major new or replacement equipment
- Risk considerations

Due to individual plant configurations and the walkdown guidance screening process followed to select the final SWEL equipment, it is possible that some classes of equipment will not be represented on the SWEL. The walkdown guidance recognizes this is due to the equipment not being present in the plant (e.g., some plants generate direct current power using inverters and

therefore do not have motor generators) or the equipment being screened out during the screening process (the screening process is described in Section 3 of the walkdown guidance). Based on the information provided, the NRC staff noted that a detailed explanation was provided justifying cases where specific classes of equipment were not included as part of the SWEL, and concludes that these exclusions are acceptable.

The NRC staff also noted that a rapid drain-down list was not included as part of the SWEL 2, as described in Section 3 of the guidance. In the walkdown guidance, one definition of rapid drain-down is the lowering of the water level to the top of the fuel assemblies within 72 hours after the earthquake. In Section 4.4.1 of the walkdown report, the licensee referenced excerpts its current licensing basis from the updated final safety analysis report (UFSAR) to indicate the following:

....To avoid unintentional draining of the pool, there are no penetrations that would permit the pool to be drained below one foot above the active fuel. All lines extending below this level are equipped with suitable valving to prevent backflow ...

In order to determine if potential rapid drain-down items were present in the SFP, the licensees were asked to verify any SFP penetrations below about 10 feet above the top of the fuel assemblies. Based on the discussion above, it appears that this assessment was not performed for the OCNGS SFP. The staff reviewed the UFSAR Section 9.1.2.2.1 and additional information provided in the walkdown report and was unable to identify if penetrations exist within the 10 feet above top of fuel height recommended in the guidance. However, the SFP licensing basis information provided in the UFSAR discusses several safety features that will prevent the draining of the pool to one foot about the fuel. Since this appears to be in compliance with the plant's current seismic licensing basis, the NRC staff concludes the licensee minimally meets the intent of the walkdown guidance to verify the current licensing basis.

After reviewing the SWEL 1 and 2 and substitutions, the NRC staff concludes that the sample of SSCs represents diversity of component types and assures inclusion of components from critical systems and functions, thereby meeting the intent of the walkdown guidance. In addition, the NRC staff notes that the equipment selection personnel were appropriately supported by plant operations staff as described in the walkdown guidance.

3.2.3 Implementation of the Walkdown Process

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Section 4, Seismic Walkdowns and Area Walk-Bys, of the walkdown guidance provides information to licensees regarding the conduct of the seismic walkdowns and area walk-bys for each site.

The NRC staff reviewed Sections 5 and A5 of the amended walkdown reports, which summarizes the results of the seismic walkdowns and area walk-bys, including an overview of the number of items walked down and the number of areas walked-by. The walkdown report states that one team, which consisted of at least two qualified Seismic Walkdown Engineers (SWEs) conducted the seismic walkdowns and area walk-bys. The licensee stated that, the initial walkdown

activities were conducted during the week of August 20, 2012. In addition, as of December 31, 2012, the licensee completed a subsequent set of walkdowns for a number of components that were inaccessible during the initial walkdowns. The walkdown report states that the SWEs discussed their observations and judgments with each other during the walkdowns. Additionally, the SWEs agreed on the results of their seismic walkdowns and area walk-bys before reporting the results of their review. Appendices C, AC, D and AD of the amended walkdown reports provide the completed seismic walkdown checklists (SWCs) and area walk-by checklists (AWCs), documenting the results for each item of equipment on the SWELs and each area containing SWEL equipment. The licensee used the checklists provided in Appendix C of the walkdown guidance report without modification.

The licensee documented cases of potentially adverse seismic conditions (PASCs) in the checklists and entered them into the CAP to be further evaluated and addressed as required. Tables 5-2, 5-3, A5-2 and A5-3 of the amended walkdown report list the PASCs identified during the seismic walkdowns and the area walk-bys. The tables provide a description of the condition and its current status. Based on the initial review of the checklists, the NRC staff was unable to confirm that all the PASCs identified during the walkdowns were included in this table.

By letter dated November 1, 2013, the NRC staff issued two questions in a request for additional information (RAI) in order to obtain clarification regarding the process followed by the licensee when evaluating conditions identified in the field during the walkdowns and walk-bys. Specifically, in RAI 1, the staff requested the licensee to provide further explanation regarding how a field observation was determined to be PASC, and to ensure that the basis for determination was addressed using normal plant processes and documented in the walkdown report. In response to RAI 1, the licensee confirmed that all conditions identified during the walkdowns and walk-bys were documented as issue reports (IRs) in the OCNGS CAP. The licensee referred to Tables 5-2 and 5-3, A5-2 and A5-3 of the amended walkdown report, which include all the PASCs identified during the walkdowns and area walk-bys, as well as other potentially adverse conditions. The licensee stated that in addition to addressing the PASCs through the CAP, other non-seismic potentially adverse conditions, such as housekeeping and material conditions items, were identified by SWEs and addressed through the CAP.

After evaluating the licensee's response and reviewing Tables 5-2, 5-3, A5-2 and A5-3, the NRC staff concludes that the licensee responded appropriately to RAI 1, PASCs were properly identified and documented, and summary Tables 5-2, 5-3, A5-2 and A5-3 are considered complete.

In addition to the information provided above, the licensee stated that anchorage configurations were verified to be consistent with existing plant documentation for at least 50 percent of the nonline-mounted SWEL items, in accordance with Section 4 of the walkdown guidance.

Sections A1.1 and A5.2 of the amended walkdown report confirms that supplemental walkdowns were performed for 15 of the 16 items, along with six supplemental inspections of electrical cabinets, which were deferred due to inaccessibility during the initial walkdowns. Table AE-1 of the amended walkdown report provides details on the one cabinet that remained inaccessible after the refueling outage and includes the condition which caused the delay of the walkdown.

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The reason for the inaccessibility was among those allowed by the walkdown guidance. By letter dated September 16, 2013, the licensee updated its commitment for completing the delayed inspection by December 31, 2014, and to submit the final updated walkdown report by March 31, 2015.

In addition, the licensee stated that the internally mounted items on eight electrical cabinets were inaccessible due to the energized nature of the cabinets or required major disassembly to be inspected. The NRC staff conducted a detailed reviewed of the SWCs and AWCs and noted that the external anchorage conditions and/or the immediate area surrounding these components were included during the initial walkdown.

Based on the information provided in the licensee's submittals, the NRC staff concludes that the licensee's implementation of the walkdown process meets the intent of the walkdown guidance.

3.2.4 Licensing Basis Evaluations and Results

Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provides information to licensees regarding the conduct of licensing basis evaluations for items identified during the seismic walkdowns as degraded, nonconforming, or unanalyzed that might have potential seismic significance.

The NRC staff reviewed Section 6 and A6 of the OCNGS amended walkdown report and the licensee response to RAI 1. In response to RAI 1, the licensee provided additional clarification regarding the process for conducting the seismic licensing basis evaluations of the PASCs identified during the seismic walkdowns and area walk-bys. The licensee stated that all identified PASCs were entered into the OCNGS CAP to be further evaluated and addressed as required. The licensing basis evaluations were completed and documented within the IR inside the CAP. Tables 5-2 and 5-3 of the walkdown report list the key licensee findings, and provide a complete list of the potentially degraded, nonconforming, or unanalyzed conditions. This table also provides the description, condition and completion status of the item.

The staff reviewed the CAP entries and the description of the potential deficiencies. The staff concludes that the licensee appropriately identified degraded, nonconforming, or unanalyzed conditions and entered them into the CAP, which meets the intent of the walkdown guidance.

3.2.5 Conclusion

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Based on the discussion above, the NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance for personnel qualifications, development of SWELs, implementation of the walkdown process, and seismic licensing basis evaluations.

3.3 <u>Peer Review</u>

Section 6, Peer Review, of the walkdown guidance provides licensees with information regarding the conduct of peer reviews for the activities performed during the seismic walkdowns. Page 6-1

of the walkdown guidance identifies the following activities to be conducted during the peer review process:

- Review the selection of the SSCs included on the SWELs
- Review a sample of the checklists prepared for the seismic walkdowns and area walk-bys
- Review the licensing basis evaluations
- · Review the decisions for entering the potentially adverse conditions into the CAP
- Review the walkdown report

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• Summarize the results of the peer review process in the walkdown report

The NRC staff reviewed the information provided in Section 8 and A8 of the OCNGS amended walkdown report which describes the conduct of the peer review. In addition, the staff reviewed the response to RAL2. In RAL2, the staff requested the licensee to provide additional information on the overall peer review process that was followed as part of the walkdown activities. Specifically, the staff requested the licensee to confirm that the activities identified on page 6-1 of the walkdown guidance were assessed and documented in the report. The licensee was also requested to confirm that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. In response to RAL2, the licensee confirmed that all the activities identified on page 6-1 of the walkdown guidance were included as part of the peer review process and referred to the summary of the peer review activities provided in Section 8 and A8 and the full peer review report in Appendixes F and AF of the amended walkdown report. In addition, the licensee stated that there were no cases where any peer reviewer reviewed their own work, including for the peer review of the supplemental walkdowns associated with inaccessible items and internal electrical cabinet inspections.

The staff reviewed the licensee's summary of each of these activities, which included a discussion of the peer review team members' qualifications and level of involvement, the peer review findings, and resolution of peer review comments. After reviewing the licensee's submittals, the NRC staff concludes that the licensee sufficiently documented the results of the peer review activities and how these reviews affected the work described in the walkdown report.

Based on the discussion above, the NRC staff concludes that the licensee's results of the peer review and subsequent actions taken in response to the peer review meets the intent of Section 6 of the walkdown guidance.

3.4 IPEEE Information

Section 7, IPEEE Vulnerabilities, of the walkdown guidance provides information to licensees regarding the reporting of the evaluations conducted and actions taken in response to seismic vulnerabilities identified during the IPEEE program. Through the IPEEE program and Generic Letter 88-20, "Individual Plant Examination for Severe Accident Vulnerabilities – 10 CFR

50.54(f)," dated November 23, 1988,¹¹ licensees previously had performed a systematic examination to identify any plant-specific vulnerabilities to severe accidents.

The licensee provided background information regarding their IPEEE program and referenced several submittals to the NRC. The licensee stated that there were no vulnerabilities, anomalies, or outliers noted during the IPEEE, however two improvements, related to the combustion turbines, were recommended as part of the IPEEE report. The licensee referenced its letter to the NRC dated June 29, 2000, were both improvements were documented and resolved. In addition, the licensee referenced the NRC staff evaluation report which includes the acceptance of the disposition of the improvements. Therefore, no open items exist as result of the IPEEE program.

Based on the NRC staff's review of Section 7 and A7 of the amended walkdown report, the staff concludes that the licensee's summary of the IPEEE is consistent with and meets the intent of Section 7 of the walkdown guidance.

3.5 Planned Upgrades

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The licensee did not identify any planned or newly installed protection and mitigation features in the walkdown report.

3.6 NRC Oversight

3.6.1 Independent Verification by Resident Inspectors

On July 6, 2012,¹² the NRC issued Temporary Instruction (TI) 2515/188, "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns." In accordance with the TI, NRC inspectors independently verified that the OCNGS licensee implemented the seismic walkdowns in accordance with the walkdown guidance. Additionally, the inspectors independently performed walkdowns of a sample of seismic protection features. The inspection report dated January 31, 2013,¹³ documents the results of this inspection and states that no findings were identified.

4.0 INACCESSIBLE ITEMS

The equipment and areas that were inaccessible during the 180-day period are listed in Table E-1 of the walkdown report. The list of inaccessible items also includes the condition which caused the delay of the walkdown. The results of the walkdowns for all but one item of the delayed equipment were documented in the amended walkdown report dated April 26, 2013. Table AE-1 of the amended walkdown report summarizes the reason why this item is inaccessible during normal plant operation and notes that the OCNGS IR has been created to track completion of the seismic walkdown for this item. The licensee committed to complete the delayed

¹¹ ADAMS Accession No. ML031150465.

¹² ADAMS Accession No. ML12156A052.

¹³ ADAMS Accession No. ML13031A540.

inspection of the inaccessible item by December 31, 2014, and to submit the final updated walkdown report by March 31, 2015.

5.0 CONCLUSION

The NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance. The staff concludes that the licensee, through the implementation of the walkdown guidance activities and, in accordance with plant processes and procedures, verified the plant configuration with the current seismic licensing basis; addressed degraded, nonconforming, or unanalyzed seismic conditions; and verified the adequacy of monitoring and maintenance programs for protective features. Furthermore, the staff notes that no immediate safety concerns were identified. The staff acknowledges that a supplemental letter will be provided by March 31, 2015, addressing the remaining inaccessible items consistent with the regulatory commitment. The NRC staff reviewed the information provided and determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter, dated March 12, 2012.

If you have any questions, please contact me at 301-415-3100 or by e-mail at <u>John.Lamb@nrc.gov</u>.

Sincerely,

/RA/

John G. Lamb, Senior Project Manager Plant Licensing Branch I-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-219

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Enclosure: Staff Assessment of Seismic Walkdown Report

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