

July 2, 2001

Mr. Theodore Sullivan
Vice President - Operations
Entergy Nuclear Northeast
James A. FitzPatrick Nuclear Power Plant
Post Office Box 110
Lycoming, NY 13093

SUBJECT: FITZPATRICK - NRC's INSPECTION REPORT 50-333/2001-04

Dear Mr. Sullivan:

On May 19, 2001, the NRC completed an inspection at the James A. FitzPatrick Nuclear Power Plant. The results of this inspection were discussed on June 7, 2001, with you and members of your staff. The enclosed report presents the results of that inspection.

This 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 selected examination of procedures and representative records, observations of activities, and interviews with personnel.

The NRC identified one finding regarding ineffective corrective actions on a degraded safety system heat exchanger that was evaluated under the risk significance determination process and was determined to be of very low safety significance (Green). This finding has been entered into your corrective action program and is discussed in the summary of findings and in the body of the attached inspection report. Furthermore, this finding was determined to involve a violation of NRC requirements, but because of the very low safety significance, this violation was non-cited.

Mr. T. Sullivan

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Sincerely,

/RA Richard S. Barkley for/

Glenn W. Meyer, Chief
Projects Branch 3
Division of Reactor Projects

Docket No. 50-333
License No.: DPR-59

Enclosure: Inspection Report 50-333/2001-04

Attachment: Supplemental Information

cc w/encl:

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Mr. T. Sullivan

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No.: 50-333

License No.: DPR-59

Report No.: 50-333/2001-04

Licensee: Entergy Nuclear Northeast
Post Office Box 110
Lycoming, NY 13093

Facility: James A. FitzPatrick Nuclear Power Plant

Location: 268 Lake Road
Scriba, New York 13093

Dates: April 1 - May 19, 2001

Inspectors: R. A. Rasmussen, Senior Resident Inspector
R. A. Skokowski, Resident Inspector
J. C. Jang, Senior Health Physicist
L. M. Cline, Reactor Inspector

Approved by: G. W. Meyer, Chief
Projects Branch 3
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000333/01-04, on 04/01 - 05/19/2001; Entergy Nuclear Northeast, James A. FitzPatrick Nuclear Power Plant; Heat Sink Performance.

The report covers a seven-week inspection by resident inspectors, a baseline specialist inspection of the radiological environmental monitoring program and radioactive material control program, and a specialist baseline inspection of heat sink performance.

These inspections identified one Green issue that was a noncited violation (NCV). The significance of most findings is indicated by their color (green, white, yellow, red) using IMC 0609 "Significance Determination Process" (SDP). Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

Mitigating Systems

GREEN. The inspector determined that a significant corrective action specified for a degraded condition identified on the A residual heat removal (RHR) heat exchanger had not been completed. Specifically, upon discovery of a degraded condition on the A RHR Heat Exchanger in October 1998, Entergy did not examine the B RHR heat exchanger as planned in October 2000 or perform an appropriate engineering evaluation regarding the potential degraded condition.

The ineffective corrective action was evaluated using the SDP and determined to be Green (of very low safety significance) because the subsequent engineering evaluation performed by Entergy determined that the expected condition on the B RHR heat exchanger would not impact the ability of the RHR system to perform its safety function. This finding was a non-cited violation of NRC requirements. (Section 1R07)

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Report Details

SUMMARY OF PLANT STATUS

The reactor operated at full power for the majority of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R04 Equipment Alignments

a. Inspection Scope

While emergency diesel generator (EDG) A was unavailable for preplanned maintenance, the inspectors completed a partial walkdown of the operable EDGs and the emergency core cooling systems (ECCS). During this walkdown the inspectors verified that significant valves and circuit breakers were in the appropriate position by comparing actual component position and the position described in the applicable operating procedures. The inspectors also performed a visual inspection of the material condition of the major components of the EDGs and the ECCS.

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors toured several plant areas and observed conditions related to fire protection. Inspectors looked for transient combustible materials, observed the condition of suppression systems, observed the condition of penetration seals, observed the condition of ventilation system fire dampers, and verified fire doors were functional. These included:

- Cable spreading room.
- Station battery room A.

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance

a. Inspection Scope

The inspector verified that Entergy's maintenance, testing, and inspection were adequate to ensure proper heat transfer for the following heat exchangers:

- Emergency service water heat exchanger for the East Crescent Unit Cooler 66UC-22K
- Emergency service water heat exchanger for the West Crescent Unit Cooler 66UC-22C
- Residual heat removal heat exchanger 10E-2A

The inspector reviewed heat exchanger test methodology, frequency of testing, test conditions, acceptance criteria, trending of results, and the status of commitments Entergy had made in response to Generic Letter 89-13, "Service Water System Problems Affecting Safety Related Equipment." Selected test performance data was reviewed to verify test results reflected heat exchanger condition and that operation was consistent with design. The inspector assessed the trending of the measured data for the components inspected and Entergy's proposed actions for results not within the acceptance criteria. Also, a sample of deficiencies related to heat exchanger performance were reviewed to verify Entergy entered identified problems into the corrective action program and completed appropriate and timely corrective action.

b. Observations and Findings

The inspector determined that a significant corrective action specified for a degraded condition identified on the A RHR heat exchanger had not been completed. Specifically, upon discovery of a degraded condition on the A RHR Heat Exchanger, Entergy did not examine the B RHR heat exchanger or perform an appropriate engineering evaluation regarding the potential degraded condition. The untimely corrective action was evaluated using the SDP and determined to be GREEN because subsequent engineering evaluation performed by Entergy determined that the expected condition on the B RHR heat exchanger would not impact the ability of the RHR system to perform its safety function.

The pass partition plate for the A RHR heat exchanger (10E-2A) was identified as degraded during RFO13 in November 1998. The condition was documented by Deviation/Event Report (DER)-98-03204. This DER stated that micro-biologically induced corrosion (MIC) damage was identified on the heat exchanger pass partition plate. The pass partition plate separates the inlet flow from the outlet flow and forces the water through the tubes of the heat exchanger. A failure of the pass partition plate would prevent the heat exchanger from functioning. In addition to repairing the A partition plate, the DER also stated that the B RHR heat exchanger (10E-2B) should be inspected. According to the DER, the B heat exchanger was last inspected in 1990 and found in good condition, and its next inspection was scheduled for the upcoming refueling outage (RFO 14, October 2000). Thus, to address the identified extent of condition, the DER response specified that the B RHR heat exchanger pass partition plate be inspected for damage during RFO14.

In November 2000 the inspection of the B RHR heat exchanger was rescheduled from RFO14 to RFO15. As a result the visual inspection of the partition plate for the B RHR heat exchanger was not performed. However, Entergy did not perform an engineering evaluation regarding the consequences of not performing the visual inspection of the pass partition plate for another fuel cycle. Although DER-98-03204 specified the inspection of the B heat exchanger at the next refueling outage, no action item (ACTS) was assigned to track completion of the visual inspection. Entergy closed out DER-98-03204 on November 29, 1998, following completion of the repairs on the A heat exchanger pass partition plate.

In response to the inspector's concerns, Entergy performed an evaluation of the condition of the B RHR heat exchanger and concluded that the heat exchanger would remain operable until the scheduled inspection. This evaluation was based on the last known condition of the heat exchanger, the expected corrosion rate, and the results of heat exchanger performance testing that have not shown bypass flow. The inspector reviewed the evaluation and considered it adequate. The inspector also noted that Entergy Administrative Procedure (AP)-19.12, Service Water Inspection Program, requires that the system engineer for each service water system develop an inspection program for each system for each refueling outage. For RFO14 though a potential degraded condition existed on the B RHR heat exchanger, no inspections had been scheduled for the RHR service water system.

The failure to take effective corrective actions was a violation of 10CFR50, Appendix B, Criterion XVI, "Corrective Action," which requires the prompt correction of conditions adverse to quality. For this incidence Entergy's original disposition of a November 1998 degraded condition specified on the A RHR heat exchanger that a visual inspection of the B RHR heat exchanger be performed during the next refueling outage (October 2000). However, Entergy did not complete the inspection at that time, nor did Entergy perform an engineering evaluation to determine the impact of not performing the prescribed corrective action when it was specified to be completed. The failure to complete timely corrective action regarding corrosion of the pass partition plate of the RHR heat exchangers was considered more than minor because failure of the pass partition plate could lead to bypass flow in the heat exchanger that could reduce its heat removal capacity. By not performing the visual inspection of the B RHR heat exchanger pass partition during RFO14, and by not completing an evaluation of the impact of not performing this corrective action, Entergy had not assessed the condition of the B RHR heat exchanger or its ability to perform its safety function. This failure to implement timely, effective corrective action was determined to be Green, because subsequent engineering evaluation performed by Entergy determined that the expected condition of the B heat exchanger would not impact the ability of the RHR system to perform its safety function. The issue associated with this violation was entered into the Entergy corrective action system as DER-01-01880. **(NCV 05000333/2001-004-001)**

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed actions taken to correct repeat failures of the B core spray hold pump. The inspectors reviewed Entergy's action plan, interviewed engineers, and observed some of the maintenance and retest activities. The inspectors compared Entergy's actions to those described in their action plan.

The inspectors also reviewed a failure of an RHR heat exchanger level control switch to determine whether the failure was properly classified.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessment and Emergent Work

a. Inspection Scope

The inspectors reviewed the risk assessment during planned maintenance on the B emergency service water (ESW) system. This review included comparing the work scope of the risk assessment to the actual configuration of plant systems. The inspectors toured the plant, attended plant status meetings, and reviewed plant logs.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the following operability determinations performed to address issues identified with safety significant systems. The inspectors reviewed the FSAR, and as applicable viewed the discrepant condition.

- Potential common mode failure of the EDG room ventilation temperature controllers due to repeat calibration failures.
- Minor correction to the General Electric analysis related to the loss of coolant accident (LOCA) analysis.
- Degraded piping support on the RHR service water system.

b. Findings

No findings of significance were identified.

1R19 Post Maintenance Testing

a. Inspection Scope

The inspectors observed and reviewed the post maintenance testing associated with the following:

- Emergent replacement of the EDG A direct current (DC) fuel oil pump. WR 99-02658-01
- Outage maintenance to the HPCI steam admission valve, 10MOV-14. WR 99-04883

The inspectors reviewed technical specifications, the final safety analysis report (FSAR), and compared the testing requirements to those described by the site's administrative procedure for post maintenance testing. The inspectors verified that the testing met the appropriate test objectives.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testinga. Inspection Scope

The inspectors reviewed procedures and observed portions of testing related to the following surveillance tests:

- ST-6H, Standby Liquid Control Quarterly Operability Test.
- ST-24K, RCIC Torus Suction Operability Test.

The inspectors reviewed technical specifications, the FSAR, and system drawings. The inspectors verified that the testing met the appropriate test objectives.

b. Findings

No findings of significance were identified.

2 RADIATION SAFETY

Cornerstone: Public Radiation Safety (PS)

2PS3 Radiological Environmental Monitoring Program (REMP)

a. Inspection Scope (71122.03)

The inspector reviewed the following documents to evaluate the effectiveness of the Radiological Environmental Monitoring Program (REMP) at the:

- J. A. FitzPatrick Environmental Laboratory, Fulton, NY;
- J. A. FitzPatrick Nuclear Power Plant site; and
- Aquatic and terrestrial sampling contractor, EA Engineering Science and Technology, Oswego, NY.

The requirements of the REMP are specified in the Technical Specifications/Offsite Dose Calculation Manual (TS/ODCM).

J. A. FitzPatrick Environmental Laboratory

- 1999 Annual REMP Report and the 2000 Draft REMP Report;
- analytical results for 2001 REMP samples;
- 2000 calibration results for all TS/ODCM air samplers;
- calibration results for gamma, and alpha/beta measurement instruments;
- J. A. FitzPatrick Environmental Laboratory Quality Assurance Manual;
- implementation of the quality control programs;
- 2000 and 2001 quality control charts for gamma spectrometry systems and a proportional counter;
- interlaboratory and intralaboratory comparisons;
- environmental thermoluminescent dosimeters (TLDs) program;
- self-assessment (RE-00-409);
- interlaboratory TLD comparisons, including the 12th International Intercomparison of Environmental Dosimeters; and
- associated analytical procedures.

J. A. FitzPatrick Nuclear Power Plant site

- most recent J. A. FitzPatrick ODCM (Revision 6, November 30, 1999) and technical justifications for ODCM changes, including sampling media and locations;
- NQA Audit Report (Audit No. A01-04J, March 20-April 9, 2001) for the REMP/ODCM implementations;
- most recent calibration results of the meteorological monitoring instruments (October and November 2000) for wind direction, wind speed, and temperature;
- 1999, and 2000 meteorological monitoring data recovery statistics;
- calibration results for gamma spectrometry system; and
- associated procedures.

EA Engineering Science and Technology

- Aquatic and terrestrial sampling procedures;
- sample preservation and shipping process; and
- the Land Use Census procedure and the 2000 results.

The inspector also toured and observed the following activities to evaluate the effectiveness of the licensee's REMP.

- observation for the operability of meteorological monitoring instruments at the tower and the control room;
- observation at the analytical laboratory, J. A. FitzPatrick Environmental Laboratory;
- observation for air iodine/particulate sampling techniques; and
- walk-down for determining whether all air samplers, milk farms, and 25%TLDs were located as described in the ODCM (including control and indicator stations) and for determining the equipment material condition.

b. Findings

No findings of significance were identified.

2PS3 Radioactive Material Control Program

a. Inspection Scope (71122.03)

The inspector reviewed the following documents to ensure that Entergy met the requirements specified in their program for the unrestricted release of material from the Radiologically Controlled Area (RCA):

- most recent calibration results for the radiation monitoring instrumentation (small articles monitor, SAM-9), including the (a) alarm setting, (b) response to the alarm, and (c) the sensitivity;
- criteria for the survey and release of potentially contaminated material using a gamma spectroscopy (calibrations efficiency for bulk sample analyses);
- methods used for control, survey, and release from the RCA; and
- associated procedures and records to verify for the lower limits of detection for bulk sample analyses.

The review was against criteria contained in 10CFR20, NRC Circular 81-07, NRC Information Notice 85-92, NUREG/CR-5569, Health Position Data Base (Positions 221 and 250), and FitzPatrick procedures.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems

Inspection findings presented in Section 1R07 of this report also had implications regarding Entergy's implementation of the corrective action system. As described above the inadequate implementation of the corrective action program resulted in corrective actions not being implemented as intended or evaluated based on the changes in plan. For the purpose of this inspection, this issue was dispositioned as an individual violation of 10 CFR 50, Appendix B, "Corrective Actions".

Additional items associated with the corrective action program were reviewed without findings.

4OA5 Other

(Closed) LER 050333/2000-013: High Pressure Coolant Injection System (HPCI) Declared Inoperable Due to Closed Steam Supply Valve. The steam supply valve to HPCI, 23MOV-25, was shut in response to an engineering question related to the operability of the valve motor operator. After further evaluation it was determined that no deficiency existed and the system was restored. This issue was minor and the LER was closed during an onsite review.

4OA6 Meetings

Exit Meeting Summary

On June 7, 2001, the inspectors presented the inspection results to Ted Sullivan and members of the Entergy staff, who acknowledged the findings presented. The inspectors asked whether any materials examined during the inspection should be considered proprietary. Where proprietary information was identified, it was returned to Entergy after review.

During the exit one finding of very low safety significance was discussed, which was determined to be a non-cited violation (NCV). Should Entergy elect to contest this NCV, a written response within 30 days of the date of this Inspection Report, with the basis for the denial, should be sent to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement, and the NRC Resident Inspector at the FitzPatrick facility.

Public Meeting

The NRC conducted a regulatory performance meeting with Entergy on April 27 to address the root causes and corrective actions for the White performance indicator on unplanned power changes. The meeting was conducted in the FitzPatrick training center and was open for public observation. A copy of the slide presentation is attached to this report.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

a. Key Points of Contact

M. Colomb	General Manager
T. Sullivan	VP Operations
G. Tasick	Licensing Manager
G. Thomas	Director Design Engineering
A. Zaremba	Director of Safety Assurance

b. List of Items Opened, Closed and Discussed

Opened and Closed

NCV 50-333/2001-004-001: Failure to complete timely corrective action regarding a degraded condition identified in the RHR heat exchangers.

Closed

LER 050333/2000-013: High Pressure Coolant Injection System Declared Inoperable Due to Closed Steam Supply Valve.

c. List of Acronyms

ACTS	Action Commitment Tracking System
AP	Administrative Procedure
CFR	Code of Federal Regulations
DC	Direct Current
DER	Deficiency and Event Report
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
ESW	Emergency Service Water
HPCI	High Pressure Coolant Injection
IPE	Individual Plant Evaluation
IR	Inspection Report
LER	Licensee Event Report
LOCA	Loss of Coolant Accident
MIC	Micro-biologically Induced Corrosion
MR	Maintenance Rule
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission

List of Acronyms (continued)

ODCM	Offsite Dose Calculation Manual
PARS	Publicly Available Records
PI	Performance Indicator
QA	Quality Assurance

QC	Quality Control
RCA	Radiologically Controlled Area
RCIC	Reactor Core Isolation Cooling
REMP	Radiological Environmental Monitoring Program
RFO	Refueling Outage
RHR	Residual Heat Removal
SDP	Significance Determination Process
ST	Surveillance Test
TLD	Thermoluminescent Dosimeter
TS	Technical Specifications
UC	Unit Cooler
UFSAR	Updated Final Safety Analysis Report
WO	Work Order
WR	Work Request

LIST OF DOCUMENTS REVIEWED

Design Basis

DBD-010, Rev. 0, Design Basis Document for the Residual Heat Removal System-010

DBD-046, Rev. 2, Design Basis Document for the Normal Service Water, Emergency Service Water, and RHR Service Water-046

JAF-RPT-MULTI-01267, Rev. 1, Raw Water Systems Program Plan

JTS-APL-00-011, Rev. 1, Emergency Service Water Maintenance Rule (a)(1) Action Plan Operability Determination for DER-01-01880, May 18, 2001

JPEM-92-033, November 11, 1992, Test Report - Safety Related Heat Exchanger Testing - September 1992

JPEM-92-010, March 19, 1992, Special - Improvements in Heat Exchanger Testing and Closure of ACTS Items 2259 and 2414

JSEM-94-003, Implementation of a Formal Routine Inspection and Maintenance Program for Open Cycle Service Water Piping and Components

Buffalo Forge Co., G875, Rev. 0, FitzPatrick Vendor Manual No. B515-0100, Unit Coolers

Perfex, SL-7211, Rev. 0, FitzPatrick Vendor Manual No. P160-0020, Residual Heat Removal Exchangers

JSEM-93-045, 9/29/93, RHR Heat Exchanger Performance Testing

Procedures

AP-19.14, Rev. 2, Eddy Current Testing of Heat Exchanger Tubes
 ST-2Y, Rev. 5, RHR Heat Exchanger Performance Test
 ST2XA, Rev. 3, RHR Service Water Loop A Quarterly Operability Test (IST)
 ST2XB, Rev. 3, RHR Service Water Loop B Quarterly Operability Test (IST)
 ST-8Q, Rev. 24, Testing of the Emergency Service Water System (IST)
 AP-19.12, Rev. 0, Service Water Inspection Program
 MP-066.01, Rev. 4, Unit Cooler Maintenance

Calculations

JAF-CALC-RHR-02953, Rev. 0, RHR Heat Exchanger K-value with Reduced Tube Side Fouling Factor
 JAF-CALC-SWS-00569, Rev. 3, Emergency Service Water Cooler Performance Methodology for Crescent, Electric Bay and Cable Tunnel Coolers
 JAF-CALC-SWS-00621, Rev. 2, Emergency Service Water Flow Equations for ST-8Q
 Acceptance Criteria

DERs

DER-00-03284, Inconsistent IST acceptance criteria for RHRSW pumps
 DER-00-04754, ST-2Y "B" % deviation was outside limits
 DER-00-04758, ST-2Y "A" % deviation was outside limits
 DER-00-04824, Discrepancies noted in documentation for ST-2Y (COTS)
 DER-00-03283, Degraded Condition of 10FE-96A/B
 DER-01-00592, ESW Target Flows Not met during ST-8Q (2/9/01)
 DER-01-00163, Crescent Area Unit Cooler 66UC-22F is Inoperable
 DER-01-01067, ESW Target Flows not Met during ST-8Q (3/12/01)
 DER-00-05521, ESW Flows during ST-8Q 10/30/00
 DER-01-01880, 10E-2B Partition Plate Corrective Action Clarification
 DER-01-01875, No formal inspection program per AP-19.12 step 7.1 for RO14
 DER-01-01809, Incorrect reference in ST-2Y Rev. 5
 DER-98-03204, RHR Heat Exchanger 10E-2A pass partition
 DER-00-00503, Service Water Inspection Program Deficiencies

Routine Work Request

WR No. 97-01762-00, 10E-2A RHR Heat Exchanger A, PM-Eddy Current Examination of Hx Tubing per MP-010.02
 WR No. 97-01762-04, 10E-2A RHR Heat Exchanger A, Engineering Review and Evaluation for Erosion/Corrosion of Baffle plate
 WR No. 97-01762-05, 10E-2A RHR Heat Exchanger A, Replace Eroded/Corroded Section of Pass Partition Plate