

August 25, 2000

Mr. Thomas J. Palmisano
Site Vice President and General Manager
Palisades Nuclear Generating Plant
Consumers Energy Company
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR GENERATING PLANT - NRC INSPECTION
REPORT 50-255/2000011(DRP)

Dear Mr. Palmisano:

On August 10, 2000, the NRC completed an inspection at your Palisades Nuclear Generating Plant. The enclosed report presents the results of that inspection which were discussed on August 10, 2000, with you and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to reactor 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 no findings were identified.

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 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).*

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original signed by
Michael J. Jordan, Chief

Michael J. Jordan, Chief
Reactor Projects Branch 3

Docket No. 50-255
License No. DPR-20

Enclosure: Inspection Report 50-255/2000011(DRP)

See Attached Distribution

T. Palmisano

-2-

cc w/encl: R. Fenech, Senior Vice President, Nuclear
Fossil and Hydro Operations
N. Haskell, Director, Licensing and Performance Assessment
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Department of Attorney General (MI)
Emergency Management Division, MI Department
of State Police

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 /s/Michael J. Jordan

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cc w/encl: R. Fenech, Senior Vice President, Nuclear
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N. Haskell, Director, Licensing and Performance Assessment
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Department of Attorney General (MI)
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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-255
License No: DPR-20

Report No: 50-255/2000011(DRP)

Licensee: Consumers Energy Company
212 West Michigan Avenue
Jackson, MI 49201

Facility: Palisades Nuclear Generating Plant

Location: 27780 Blue Star Memorial Highway
Covert, MI 49043-9530

Dates: July 1 through August 10, 2000

Inspectors: J. Lennartz, Senior Resident Inspector
R. Krsek, Resident Inspector
J. Maynen, Resident Inspector
K. Coyne, Resident Inspector
T. Tongue, Project Engineer

Approved by: Michael J. Jordan, Chief
Reactor Projects Branch 3
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	Radiation Safety	Safeguards
<ul style="list-style-type: none">! Initiating Events! Mitigating Systems! Barrier Integrity! Emergency Preparedness	<ul style="list-style-type: none">! Occupational! Public	<ul style="list-style-type: none">! 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

NRC Inspection Report 50-255/2000011(DRP), Consumers Energy Company, Palisades Nuclear Generating Plant, conducted between July 1 and August 10, 2000. The baseline inspection was conducted by resident and region based inspectors. No risk significant findings were identified in any of the cornerstones of safety.

Report Details

Summary of Plant Status: The plant commenced an unplanned shutdown at the start of the inspection period to repair a leak in a reactor coolant pump seal bleed off line that could not be isolated. Following the necessary repairs, the plant was returned to operation on July 9, 2000, and reached full power on July 11, 2000. On August 5, 2000, plant power was reduced to approximately 91 percent because of an emergent nonsafety-related equipment problem regarding moisture separator drain tank level control. Necessary repairs were completed and the plant was returned to full power on August 9, 2000, where it remained for the duration of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather

a. Inspection Scope

The inspectors assessed plant procedures to protect mitigating systems from high temperature and low lake level conditions. These weather-related conditions could challenge the function of mitigating systems and components. The inspectors reviewed the following systems during this inspection:

- C Auxiliary Feedwater;
- C Critical Service Water;
- C Emergency Diesel Generators; and
- C Station Batteries.

Applicable portions of the Final Safety Analysis Report and the Design Basis Documents were reviewed for the identified systems. The inspectors also reviewed the following procedures and documents:

- Off Normal Procedure - 12, "Acts of Nature," Revision 16;
- Alarm Response Procedure - 7, "Alarm Panel EK-11," Revision 61;
- System Operating Procedure - 24, "Ventilation and Air Conditioning System," Revision 30; and
- System Operating Procedure - 23, Checklist CL-WWWCL-1, "Warm Weather Checklist," Revision 14.

In addition, the inspectors reviewed the following condition reports to verify that identified problems were being entered into the corrective action program with the appropriate characterization and significance:

- CPAL9901204, "Outside Air Temperature Exceeds Final Safety Analysis Report Design Criteria - Reading at Meteorological Tower"; and

- CPAL0002346, "Weaknesses Found in Warm Weather Checklist and Corrective Actions Taken for CPAL9901204."

b. Issues and Findings

There were no findings identified.

1R04 Equipment Alignment

a. Inspection Scope

The inspectors performed routine partial walkdowns of the safety-related 2400 Volt Electrical Safeguards Bus 1D, off site power supply sources, and shutdown cooling equipment powered by the Safeguards Bus 1D following the unplanned plant shutdown on July 1, 2000, to verify proper system lineup. The inspection consisted of verifying that Bus 1D was supplied from the normal power source, that alternate power was available to Bus 1D, and that shutdown equipment powered by the Safeguards Bus 1D was properly protected and operable. The inspection incorporated reviews of the applicable portions of Technical Specification Requirements and the following procedure:

- System Operating Procedure - 3, Checklist - 3.1, "Engineered Safeguards System Checklist (Shutdown Cooling in Service)," Revision 43

b. Issues and Findings

There were no findings identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors performed fire tours of the following areas:

- East Engineered Safeguards room;
- Engineered Safeguards Panel room;
- Emergency Diesel Generator 1-1 and day tank rooms; and
- Accessible portions of containment during the shutdown.

The inspectors observed the control of transient combustibles and ignition sources, and where applicable verified the availability of the sprinkler fire suppression system, smoke detector system and manual fire fighting equipment in these areas.

The inspectors reviewed the applicable portions of the following documents during this inspection:

- Fire Protection Implementing Procedure - 4, "Fire Protection Systems and Fire Protection Equipment," Revision 15;

- Off Normal Procedure - 25.1, "Fire which Threatens Safety-Related Equipment," Revision 10; and
- Final Safety Analysis Report, Section 9.6, "Fire Protection," Revision 22.

b. Issues and Findings

There were no findings identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors observed simulator evaluations for licensed operators' requalification testing. The inspectors focused on alarm response, command and control of crew activities, procedural adherence, and implementation of emergency plan requirements. The simulator scenarios were reviewed for the appropriate scope, depth and complexity in the stated objectives as compared with the simulator testing guidelines contained in NUREG-1021, "Operator Licensing Examinations for Power Reactors." The inspectors reviewed Simulator Guide No. TBAD-SG1.0013, which included the following events:

- C ED08C - "Loss of Preferred Electrical Bus #3Y (30)";
- C MS06A - "Main Steam Line Relief Valve Stuck Open";
- C MS15A - "Steam Line Outside Containment A Steam Generator"; and
- C CC02A - "Component Cooling Water Pump P-52A Trip."

In addition, the inspectors observed the licensee evaluators' critique which assessed the operating crew's performance during the simulator evaluation.

b. Issues and Findings

There were no findings identified.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors evaluated the licensee's implementation of the Maintenance Rule, 10 CFR Part 50.65, for the following systems:

- C Main Steam Isolation;
- C Main Feedwater; and
- C High Pressure Safety Injection.

The inspectors reviewed recent maintenance rule evaluations for the systems listed above to verify the appropriate maintenance rule categorization of specific issues and to evaluate the appropriateness of the performance criteria and when applicable the goal setting established for each system. In addition, the inspectors reviewed the risk rankings and scoping criteria for the identified systems. The inspectors also interviewed the

licensee's maintenance rule coordinator and evaluated the licensee's monitoring and trending of performance data with the responsible system engineer.

The inspectors reviewed the applicable portions of the Final Safety Analysis Report and Design Basis Documents, in addition to the following maintenance rule documentation:

- Engineering Procedure EM-25, "Maintenance Rule Program," Revision 2;
- Engineering Procedure EGAD-EP-10, "Maintenance Rule Scoping Document"; and
- System Health Assessment 3rd/4th Quarter 1999, Engineered Safeguards Systems.

In addition, the inspectors reviewed the following condition reports to verify that identified problems were appropriately characterized and evaluated with respect to the maintenance rule.

- CPAL0002071, "Control Valve Does Not Close Completely During Quarterly Operating Procedure - 37, "Main Steam Isolation and Bypass Valve Testing";
- CPAL0000703, "Motor Operated Valve MO-0510 (Steam Generator E-50A Main Steam Isolation Valve Bypass) has Packing Leak";
- CPAL9902247, "Motor Operated Valve MO-0510 (Steam Generator E-50A Main Steam Isolation Valve Bypass) Packing Gland is Cocked, Packing Extruding from Stuffing Box, and Valve Stem Threads and Gland Studs Were Painted";
- CPAL9903049, "Main Feedwater Pump P-1A Failure";
- CPAL0001890, "Elevated Pump Seal Leakage on Main Feedwater Pump P-1A";
- CPAL0000831, "Removed Feedwater Pump P-1A from Service Due to Degraded Inboard Pump Seal";
- CPAL0001922, "High Pressure Safety Injection Pump P-66A Could Not Meet Required Flow Rate During Performance of Quarterly Operating Procedure - 19, "Inservice Test Procedure and ESS Check Valve Operability Test";
- CPAL0000566, "Check Valve Back-Leakage Observed During Performance of Safety Injection Tank Sampling";
- CPAL9902944, "High Pressure Air to Control Valve CV-3018 Out of Specification - Low";
- CPAL9800578, "Valve Alignment During RT-71B results in Both Trains of HPSI Being Inoperable"; and
- CPAL0002525, "Maintenance Rule Program Definition of Maintenance Preventable Functional Failure Needs Clarification with Respect to Operators Performing Maintenance During Surveillance Testing."

b. Issues and Findings

There were no findings identified.

1R13 Maintenance Risk Assessment and Emergent Work Control

a. Inspection Scope

The inspectors reviewed the effectiveness of risk assessment before maintenance was conducted and verified that the licensee had taken necessary steps to plan and control work activities for the following:

- Operator's Risk Report for July 10 through 12, 2000, pertaining to scheduled maintenance for component cooling water pumps oil leak repairs under Work Orders 24011820, "P-52A Inboard/Outboard Trico Oilers Leak," and 24011821, "P-52B Inboard/Outboard Pump Bearing Bubbler Leaks," and
- Operator's Risk Reports for August 7 through August 11, 2000, pertaining to scheduled maintenance for the P-54B Containment Spray Pump under Work Order 24010496. "Repair Leaking Drain Plug" and Work Order 24013179, "Helicoil Cooler PM."

In addition, the inspectors reviewed Administrative Procedure - 4.02 "Control of Equipment." During the inspection, the inspectors also discussed the risk evaluations and plant configuration control for the maintenance activities with operations and work control center personnel.

The inspectors reviewed the following condition reports to verify that identified problems were being entered into the corrective action program with the appropriate characterization and significance:

- C CPAL0002162, "Inconsistent Guidance Regarding Use Of Thread Sealant On Component Cooling Water Pump Drain Plugs"; and
- C CPAL0002486, "The Impact on Technical Specifications Of The Delay In Completing Repairs To P-54B Was Not Considered In Scheduling Maintenance on V-4A."

b. Issues and Findings

There were no findings identified.

1R14 Personnel Performance During Nonroutine Evolutions and Events

a. Inspection Scope

The inspectors assessed control room operator performance following a rapid down power evolution that occurred on August 5, 2000. Control room operators rapidly decreased plant power from full power to approximately 90 percent in response to non-safety-related moisture separator drain tank level control problems that resulted in an automatic trip, as designed, of a heater drain pump. Following the rapid down power, the inspectors reviewed the documents listed below to assess what had occurred, the

appropriateness of control room operators' alarm response, and compliance with plant operating procedures during the evolution:

- C Annunciator Response Procedure - 1, Annunciator Number 72, "Moisture Separator Drain Tank Hi-Lo Level," Revision 50;
- C Annunciator Response Procedure - 1, Annunciator Number 68, "Feedwater Heaters Hi Level," Revision 50;
- C Off Normal Procedure - 26, "Rapid Power Reduction," Revision 1; and
- C Shift Supervisor Logs for the period August 5 - 8, 2000.

In addition, the inspectors reviewed the following condition reports to verify that identified problems were being entered into the corrective action program with the appropriate characterization and significance:

- C CPAL0002446, "Loss of Moisture Separator Reheater Drain Tank (T-5) Level";
- C CPAL0002450, "Concurrent Positioner Failures on Both CV-0608 and CV-0609 Hamper Plant Power Recovery Efforts"; and
- C CPAL0002451, "POC-0609 (Moisture Separator Drain Tank High Level Dump Valve) Damaged From Valve Stem Over Travel."

b. Issues and Findings

There were no findings identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the operability assessments for condition reports written concerning the service water pumps and Ultimate Heat Sink, and the component cooling water system. The applicable sections of the Technical Specification Requirements, Final Safety Analysis Report and Design Basis Documents were reviewed.

In addition, the inspectors reviewed the following condition reports to verify that identified problems were being entered into the corrective action program with the appropriate characterization and significance:

- C CPAL0002197, "Start of Warm Water Recirculation Pump P-5 Causes Heavy Accumulation of Zebra Mussel Shells Near Traveling Screens";
- CPAL0002330, "Narrow Scope of Operability Determinations Related to Zebra Mussel Accumulation"; and
- C CPAL0002362, "Component Cooling Water Heat Exchanger Temperature Control Valve CV-0821 Failed Open."

b. Issues and Findings

There were no findings identified.

1R19 Post Maintenance Testing

a. Inspection Scope

The inspectors observed post maintenance testing for maintenance work performed on the High Pressure Safety Injection Pump P-66A Minimum-Flow Check Valve CK-ES3340 and Main Steam Isolation Valve CV-0501.

The inspectors reviewed final test data and verified that the post maintenance tests demonstrated the overall systems and individual components were capable of performing the intended safety function. In addition, the inspectors reviewed the applicable sections of the Technical Specifications Requirements and Final Safety Analysis Report, and the following plant procedures and documents:

- C Basis Document for Quarterly Operating - 19, "Inservice Test Procedure - High Pressure Safety Injection Pumps and Engineered Safeguards System Check Valve Operability Test," Revision 6;
- C Quarterly Operating Procedure - 19, "Inservice Test Procedure - High Pressure Safety Injection Pumps and Engineered Safeguards System Check Valve Operability Test," Revision 20;
- C Basis Document for Quarterly Operating - 37, "Main Steam Isolation and Bypass Valve Testing," Revision 4;
- C Quarterly Operating Procedure - 37, "Main Steam Isolation and Bypass Valve Testing," Revision 6; and
- C Work Order 24013051, "High Pressure Safety Injection Pump P-66A Minimum-Flow Check Valve CK-ES3340."

In addition, the inspectors reviewed the following condition reports to verify that identified problems were being entered into the corrective action program with the appropriate characterization and significance:

- C CPAL0001922, "High Pressure Safety Injection Pump P-66A Could Not Meet Required Flow Rate During Performance of Quarterly Operating Procedure - 19, "Inservice Test Procedure and ESS Check Valve Operability Test"; and
- C CPAL0002071, "Control Valve Does Not Close Completely During Quarterly Operating Procedure - 37, "Main Steam Isolation and Bypass Valve Testing."

b. Issues and Findings

There were no findings identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors observed and reviewed surveillance tests for the following risk-significant plant components or systems:

- Main Steam Isolation Valves CV-0501 and CV-0510;
- Containment Personnel Air Lock; and
- Primary Coolant System Low Temperature Overpressure Protection.

The inspection included reviews of the applicable Technical Specification Requirements and Final Safety Analysis Report, in addition to the Design Basis Documents and vendor manuals. The following surveillance test procedures and plant documents were reviewed during these inspections:

- C Basis Document for Quarterly Operating - 37, "Main Steam Isolation and Bypass Valve Testing," Revision 4;
- C Quarterly Operating Procedure - 37, "Main Steam Isolation and Bypass Valve Testing," Revision 6;
- Basis Document for Technical Specification Surveillance Procedure DWO-13, "Local leak Rate Tests for Inner and Outer Personnel Air Lock Door Seals," Revision 4;
- Technical Specification Surveillance Procedure DWO-13, "Local leak Rate Tests for Inner and Outer Personnel Air Lock Door Seals," Revision 14;
- Basis Document for Technical Specification Surveillance Procedure MI-27E, "Functional Check of Primary Coolant System Low Temperature Overpressure Protection System," Revision 2; and
- Technical Specification Surveillance Procedure MI-27E, "Functional Check of Primary Coolant System Low Temperature Overpressure Protection System," Revision 2.

b. Issues and Findings

There were no findings identified.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors reviewed Temporary Modification TM 96-032, "Solid Radioactive Waste Processing Skid RVR-200." The inspectors interviewed a design engineer and reviewed the following licensee documentation:

- Temporary Modification Form 3621 for Temporary Modification TM 96-032

In addition, the inspectors reviewed the following condition report to verify that identified problems were being entered into the corrective action program with the appropriate characterization and significance:

C CPAL0002318, "Temporary Modification Tags Remaining Installed After Temporary Modification was Removed"

b. Issues and Findings

There were no findings identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator Verification

Safety System Functional Failures

a. Inspection Scope

The inspectors reviewed Licensee Event Reports for the period from September 1, 1999, to July 1, 2000, to validate the data for the performance indicator regarding safety system functional failures.

a. Issues and Findings

There were no findings identified.

4OA6 Meetings, including Exit

The inspectors presented the inspection results to Mr. Palmisano, Site Vice President and General Manager, and other members of licensee management at the conclusion of the inspection on August 10, 2000. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

G. R. Boss, Operations Manager
D. E. Cooper, General Manager, Plant Operations
N. L. Haskell, Director, Licensing and Performance Assessment
D. G. Malone, Licensing
D. J. Malone, Engineering Director
G. C. Packard, Operations Superintendent
T. J. Palmisano, Site Vice President

NRC

D. Hood, Project Manager, NRR

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF INSPECTIONS PERFORMED

The following inspection-area procedures were used to perform inspections during the report period. Documented findings are contained in the body of the report.

<u>Inspection Procedure</u>		<u>Report Section</u>
<u>Number</u>	<u>Title</u>	
71111-01	Adverse Weather	1R01
71111-04	Equipment Alignments	1R04
71111-05	Fire Protection	1R05
71111-11	Licensed Operator Requalification	1R11
71111-12	Maintenance Rule Implementation	1R12
71111-13	Maintenance Risk Assessment and Emergent Work Control	1R13
71111-14	Personnel Performance During Nonroutine Evolutions and Events	1R14
71111-15	Operability Evaluations	1R15
71111-19	Post Maintenance Testing	1R19
71111-22	Surveillance Testing	1R22
71111-23	Temporary Plant Modifications	1R23
71151	Performance Indicator Verification	4OA1