



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

June 19, 2009

Mr. Benjamin C. Waldrep
Vice President
Carolina Power and Light Company
Brunswick Steam Electric Plant
P.O. Box 10429
Southport, NC 28461

**SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT – NRC PROBLEM IDENTIFICATION
AND RESOLUTION INSPECTION REPORT 05000325/2009006 AND
05000324/2009006**

Dear Mr. Waldrep:

On May 8, 2009, the U. S. Nuclear Regulatory Commission (NRC) completed an inspection at your Brunswick Steam Electric Plant Units 1 and 2. The enclosed report documents the inspection findings, which were discussed on May 8, 2009, with you and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and with the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of plant equipment and activities, and interviews with personnel.

On the basis of the samples selected for review, there were no findings of significance identified during this inspection. The team concluded that problems were properly identified, evaluated, and resolved within the problem identification and resolution (PI&R) program. However, during the inspection, some examples of minor problems were identified associated with identification of plant issues, problem evaluation, implementation of timely corrective actions and preventive maintenance, and evaluation of operating experience.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Steven J. Vias, Chief
Reactor Projects Branch 7
Division of Reactor Projects

Docket Nos. 50-325, 50-324
License Nos. DPR-71, DPR-62

Enclosure: Inspection Report 05000325/2009006 and 05000324/2009006
w/Attachment: Supplemental Information

cc w/encl. (See page 3)

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CP&L

4

cc w/encl (continued)

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5

Letter to Benjamin C. Waldrep from Steven J. Vias dated June 19, 2009.

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT – NRC PROBLEM IDENTIFICATION
AND RESOLUTION INSPECTION REPORT 05000325/2009006 AND
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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos: 50-325, 50-324

License Nos: DPR-71, DPR-62

Report No: 05000325/2009006 and 05000324/2009006

Licensee: Carolina Power and Light Company (CP&L)

Facility: Brunswick Steam Electric Plant, Units 1 and 2

Location: 8470 River Road SE
Southport, NC 28461

Dates: April 20 – 24, 2009
May 4 – 8, 2009

Inspectors: J. Rivera-Ortiz, Senior Reactor Inspector, Team Leader
G. Kolcum, Resident Inspector, Brunswick
R. Berryman, Senior Reactor Inspector
S. Atwater, Senior Reactor Inspector
S. Rose, Senior Reactor Inspector

Approved by: Steven J. Vias, Chief
Reactor Projects Branch 7
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000325/2009006, 05000324/2009006; 04/20/2009 – 05/08/2009; Brunswick Steam Electric Plant, Units 1 and 2; biennial inspection of the identification and resolution of problems.

The inspection was conducted by four senior reactor inspectors and a resident inspector. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

Identification and Resolution of Problems

The inspection team concluded that, in general, problems were adequately identified, prioritized, and evaluated; and effective corrective actions were implemented. Site management was actively involved in the corrective action program (CAP) and focused appropriate attention on significant plant issues. The team found that employees were encouraged by management to initiate ARs to address plant issues.

The licensee was effective at identifying problems and entering them into the CAP for resolution, as evidenced by the relatively few deficiencies identified by the NRC that had not been previously identified by the licensee during the review period. The threshold for initiating action requests (ARs) was appropriately low, as evidenced by the type of problems identified and large number of ARs entered annually into the CAP. Action requests normally provided complete and accurate characterization of the problem. However, the team identified two minor equipment issues during system walkdowns involving selected risk-significant safety-related systems, which were not already entered into the CAP.

Generally, prioritization and evaluation of issues were adequate consistent with the licensee's CAP guidance. Formal root cause evaluations for significant problems were adequate, and corrective actions specified for problems did address the cause of the problems. The age and extensions for completing evaluations were closely monitored by plant management, both for high priority nuclear condition reports (NCRs), as well as for adverse conditions of less significant priority. Also, the technical adequacy and depth of evaluations (e.g., root cause investigations) were typically adequate. However, the team identified a minor issue associated with the problem evaluation of a risk significant system, which could have resulted in unresolved issues with incomplete corrective actions.

Corrective actions were generally effective, timely, and commensurate with the safety significance of the issues. However, the team identified two minor issues associated with inadequate and untimely corrective actions that allowed potential unresolved conditions adverse to quality to remain uncorrected involving degraded equipment performance. This example of inadequate corrective actions did not represent a significant safety concern but reflected a lack of attention to detail in the implementation of corrective actions and preventive maintenance activities.

Enclosure

The operating experience program was effective in screening operating experience for applicability to the plant, entering items determined to be applicable into the CAP, and taking adequate corrective actions to address the issues. External and internal operating experience was adequately utilized and considered as part of formal root cause evaluations for supporting the development of lessons learned and corrective actions for CAP issues. However, the team identified an example where a Significant Adverse Condition Investigation report did not evaluate the applicable operating experience as directed by the licensee's investigation procedure.

The licensee's audits and self-assessments were critical and effective in identifying issues and entering them into the corrective action program. These audits and assessments identified issues similar to those identified by the NRC with respect to the effectiveness of the CAP.

Based on general discussions with licensee employees during the inspection, targeted interviews with plant personnel, and reviews of selected employee concerns records, the inspectors determined that personnel at the site felt free to raise safety concerns to management and use the CAP as well as the employee concerns program to resolve those concerns.

A. NRC Identified and Self-Revealing Findings

None

B. Licensee Identified Violations

None

REPORT DETAILS

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution

a. Assessment of the Corrective Action Program (CAP)

(1) Inspection Scope

The inspectors reviewed the licensee's CAP procedures which described the administrative process for initiating and resolving problems primarily through the use of action requests (ARs), which were then processed into the CAP as nuclear condition reports (NCRs). The inspectors selected and reviewed a sample of NCRs that had been issued between February 2008 and April 2009. This period of time was purposefully chosen to follow the last Biennial Problem Identification and Resolution (PI&R) inspection conducted in February 2008. This review was performed to verify that problems were being properly identified, appropriately characterized, and entered into the CAP for resolution. Where possible, the inspectors independently verified that the corrective actions were implemented as intended.

Within the time frame described above, the inspectors selected NCRs from principally four specific areas of interest. The first inspection area consisted of a detailed review of selected NCRs associated with two risk-significant systems: Service Water (SW) and Instrument Air. The inspectors conducted plant walkdowns of equipment associated with the selected systems and other plant areas to assess the material condition and to look for any deficiencies that had not been previously entered into the CAP. The inspectors reviewed NCRs, maintenance history, completed work orders (WOs) for the systems, and reviewed associated system health reports. These reviews were performed to verify that problems were being properly identified, appropriately characterized, and entered into the CAP for resolution. Items reviewed generally covered a 15-month period of time; however, in accordance with the inspection procedure, the inspectors performed a five-year review of age-dependent issues for the selected risk significant systems.

The second inspection area consisted of a representative number of NCRs that were assigned to the major plant departments, including operations, maintenance, engineering, health physics, chemistry, emergency preparedness, and security. This selection was performed to ensure that samples were reviewed across all cornerstones of safety identified in the NRC's Reactor Oversight Process (ROP). These NCRs were reviewed to assess each department's threshold for identifying and documenting plant problems, thoroughness of evaluations, and adequacy of corrective actions. The inspectors also attended meetings where NCRs were screened for significance to determine whether the licensee was identifying, accurately characterizing, and entering problems into the CAP at an appropriate threshold.

Enclosure

For the third inspection area, the inspectors selected a sample of NRC issued non-cited violations and findings, licensee identified violations, and Licensee Event Reports, to verify the effectiveness of the licensee's CAP implementation regarding NRC inspection findings and reportable events issued since the previous 2008 PI&R inspection.

The fourth inspection area covered the review of NCRs associated with selected issues of interest, specifically maintenance rule functional failures, non-conforming/degraded conditions, post maintenance testing issues, and diesel generator (DG) performance issues. The inspectors reviewed the NCRs to verify that problems were identified, evaluated, and resolved in accordance with the licensee's procedures and applicable NRC Regulations.

Among the four areas mentioned above, the team conducted a detailed review of selected root-cause and apparent-cause evaluations of the problems identified. The inspectors reviewed these evaluations against the descriptions of the problem described in the NCRs and the guidance in licensee procedure CAP-NGGC-0205, "Significant Adverse Condition Investigations and Adverse Condition Investigations-Increased Rigor." The inspectors assessed if the licensee had adequately determined the cause(s) of identified problems, and had adequately addressed operability, reportability, common cause, generic concerns, extent-of-condition, and extent-of-cause. The review also assessed if the licensee had appropriately identified and prioritized corrective actions to prevent recurrence.

Additionally, the team performed Control Room walkdowns to assess the main control room (MCR) deficiency list and to ascertain if deficiencies were entered into the CAP. Operator Workarounds and Operator Burden screenings were reviewed, and the inspectors verified compensatory measures for deficient equipment which were being implemented in the field.

Finally, the team reviewed site trend reports, to determine if the licensee effectively trended identified issues and initiated appropriate corrective actions when adverse trends were identified. The inspectors attended various plant meetings to observe management oversight and implementing functions of the corrective action process. These included Management Review of NCRs meetings and Unit Evaluators meetings.

Documents reviewed partially or in their entirety during this inspection are listed in the Attachment.

(2) Assessment

Identification of Issues

The team determined that the licensee was generally effective in identifying problems and entering them into the CAP and there was a low threshold for entering issues into the CAP. This conclusion was based on the type of problems entered into the CAP; the review of licensee requirements for initiating NCRs as described in licensee procedure CAP-NGGC-0200, "Corrective Action;" the management expectation that employees were encouraged to initiate NCRs for any concern regardless of whether it is a potential,

Enclosure

suspect, or actual problem; a review of system health reports; and on inspectors' observations during plant walkdowns. Trending was generally effective in monitoring and identifying plant issues. Site management was actively involved in the CAP and focused appropriate attention on significant plant issues. However, the team identified two minor equipment issues during walkdowns of the two risk-significant plant systems, which were not previously identified by the licensee.

- The 1A Nuclear Service Water (NSW) pump motor showed evidence of an active oil leak that appeared to be coming from the lower bearing sight glass. This oil leak was neither identified through a previous extent of condition evaluation for a 1A NSW pump issue nor through previous system walkdowns by Operations or Systems Engineering. The licensee initiated NCR 331824 to address this issue and determined that the quantified oil leak was small and had no impact on the operability of the 1A NSW pump.
- One of the Unit 1 SW strainers for the Circulating Water system, 1-SW-ST-3, showed evidence of recent leakage from a drain plug on the bottom. The leakage rate was evaluated at less than one drop per minute and not an operability concern. Initial extent of condition review identified that this strainer also had a leak from the same place a year ago and was addressed under WO 1139291. That work order stated that the plug had corrosion on the threads but it did not appear that the plug was replaced. The licensee initiated NCR 331832 to address this issue.

Prioritization and Evaluation of Issues

Based on the review of audits conducted by the licensee and the assessment conducted by the inspection team during the onsite period, the team concluded that problems were generally prioritized and evaluated in accordance with the licensee's CAP procedures as described in the NCR Processing Guidelines in CAP-NGGC-0200. Each NCR written was assigned a priority level at the NCR review meetings. Management reviews of NCRs were thorough, and adequate consideration was given to system or component operability and associated plant risk.

The team determined that the station had conducted root cause and apparent cause analyses in compliance with the licensee's CAP procedures, and assigned cause determinations were appropriate considering the significance of the issues being evaluated. A variety of causal-analysis techniques were used depending on the type and complexity of the issue consistent with licensee procedure CAP-NGGC-0205, "Significant Adverse Condition Investigations and Adverse Condition Investigations-Increased Rigor."

The team determined that generally, the licensee had performed evaluations that were technically accurate and of sufficient depth. The team further determined that operability, reportability, and degraded or non-conforming condition determinations had been completed consistent with the guidance contained in CAP-NGGC-0200, and OPS-NGGC-1305, "Operability Determinations."

However, the team identified a minor issue in this assessment area during the review of NCRs for the selected risk significant systems:

- On 06/21/2007, NCR 219625 (Priority 2) was initiated to evaluate frequent pedestal bearing high temperature alarms on DGs #2 and #3 during extended runs. The concern was that pedestal bearing (i.e., generator outboard bearing) temperature could potentially exceed the action limit temperature or the manufacturer's maximum operating temperature under abnormal (high) outside air temperatures. The licensee determined the required cooling air temperature and flow for the continuous operation of the DGs pedestal bearing and implemented corrective actions to ensure adequate cooling air was supplied to the bearings. Simultaneously with the pedestal bearing high temperature alarms, the DG cell exhaust damper temperature controllers (non safety-related) had experienced frequent set-point drifts. Specifically, there were instances where the exhaust dampers opened at a temperature higher than the desired set-point.

Based on the history of continuous performance problems with the exhaust damper temperature controllers and the instances where the DG pedestal bearing temperatures reached the alarm setpoint, the inspectors found that the licensee did not fully consider the potential impact of these issues on the capability of the ventilation system to perform its function. Specifically, the licensee did not fully recognize that the continuous problems with the exhaust damper controllers could challenge the operability of the DG cell components, including the pedestal bearings, on certain summer days where the outside temperature could exceed the design temperature and the DG cell exhaust dampers could fail to open at the required settings. As a result of the inspectors' observation, the licensee performed an analysis and determined that no operability concerns existed with regard to the capability of the DG ventilation system to perform its function under abnormal (high) outside temperatures. The inspectors reviewed the licensee's analysis and concluded that although the DG cell exhaust dampers were opening at a temperature higher than the set-point, they still were actuating at temperatures below the DG operability limits and sufficient margin existed to maintain operability. The licensee generated NCR 334703 to address this issue.

Effectiveness of Corrective Actions

Based on a review of corrective action documents, interviews with licensee staff, and verification of completed corrective actions, the team determined that overall, corrective actions were timely, commensurate with the safety significance of the issues, and effective, in that conditions adverse to quality were corrected in accordance with the licensee CAP procedures. For the significant conditions adverse to quality reviewed, the corrective actions directly addressed the cause and effectively prevented recurrence in that a review of performance indicators, NCRs, and discussions with licensee staff demonstrated that the significant conditions adverse to quality had not recurred. Effectiveness reviews for corrective actions to prevent recurrence (CAPRs) were scheduled consistent with licensee procedures. However, during the review of NCRs for the selected risk significant systems, the team identified two minor issues regarding

Enclosure

adequacy and timeliness of corrective actions, and implementation of adequate preventive maintenance:

- As previously mentioned, the exhaust damper temperature controllers (non safety-related pneumatic controllers) for the DG cells had experienced frequent set-point drifts. NCR 231765 was initiated in 2007 to address, in part, the temperature controllers problem and the apparent cause determination identified that poor instrument air quality was the most probable cause for the controller issues. Corrective actions to obtain an air sample and replace the air filter for these controllers were extended several times without fully recognizing the potential impact of the exhaust dampers issue on the operability of the DGs. As previously discussed, the licensee did not fully understand if the ventilation system was able to maintain the required pedestal bearing temperature under abnormal (high) outside air temperatures combined with the exhaust dampers opening at higher temperatures than the desired set-point. Consequently, the licensee did not give the proper priority to the assigned corrective actions, as evidenced by the multiple times these actions were extended. The licensee obtained the instrument air sample in May 2008 and replaced the air filter in May 2009. The team determined that this issue did not represent a significant safety concern based on the inspectors' review of the licensee's analysis, which determined that the DG building ventilation system was able to provide adequate cooling to maintain DG operability considering that the exhaust damper controllers were opening at temperatures higher than the set-point. However, this issue reflected a lack of attention to detail in the implementation of corrective actions. The licensee generated NCRs 334285 and 334294 to address this issue.
- The inspectors identified that the aforementioned instrument air filter (component ID 2-IAI-FLT-052) did not have a specific preventive maintenance schedule. The filter's vendor stated that the filter's useful life ends when the resistance to flow becomes too high or the maximum permissible pressure is reached. The inspectors found that the filter was original equipment and no tests existed to monitor its performance. In addition, the filter was classified as an "Important" component, for which the licensee's guidance for PM administration (ADM-NGGC-0203) recommends PM to be performed to meet the Maintenance Rule performance criteria. The team determined that this issue did not represent a significant safety concern based on the as found condition of the filter and the inspectors' review of the licensee's analysis, which determined that the DG building ventilation system was able to provide adequate cooling to maintain DG operability considering that the exhaust damper controllers were opening at temperatures higher than the set-point. However, this issue reflected a lack of attention to detail in the implementation of preventive maintenance activities. The licensee generated NCR 334294 to address this issue.

(3) Findings

No findings of significance were identified.

Enclosure

b. Assessment of the Use of Operating Experience (OE)

(1) Inspection Scope

The team examined licensee programs for reviewing industry operating experience, reviewed licensee's procedure CAP-NGGC-0202, "Operating Experience Program," reviewed the licensee's operating experience database, and interviewed the OE Coordinator, to assess the effectiveness of how external and internal operating experience data was handled at the plant. In addition, the team selected operating experience documents (e.g., NRC generic communications, 10 CFR Part 21 reports, licensee event reports, vendor notifications, etc.), which had been issued since February, 2008, to verify whether the licensee had appropriately evaluated each notification for applicability to the Brunswick Plant, and whether issues identified through these reviews were entered into the CAP. Documents reviewed are listed in the Attachment.

(2) Assessment

Based on interviews with the OE coordinator and a review of documentation related to the review of operating experience issues, the team determined that the licensee was generally effective in screening operating experience for applicability to the plant. Industry OE was evaluated at either the corporate or plant level depending on the source and type of document. Relevant information was then forwarded to the applicable department for further action or informational purposes. OE issues requiring action were entered into the CAP for tracking and closure. In addition, operating experience was included in apparent cause and root cause evaluations in accordance with licensee procedure CAP-NGGC-0205, "Significant Adverse Condition Investigations and Adverse Condition Investigations-Increased Rigor." During the review of apparent cause and root cause evaluations, the team noted the following performance deficiency of minor significance:

- Significant Adverse Condition Investigation report for NCR 281950, "Unplanned Limiting Condition of Operation Entry – Control Building Ventilation Isolation," did not evaluate the applicable operating experience as directed by investigation procedure CAP-NGGC-0205, which requires that the OE review needs to determine if OE exists that would have prevented the event. The licensee considered several examples of applicable OE as part of the investigation; however the investigation report did not determine if the available OE could have prevented the event. The team concluded that this issue was of minor significance because it had no safety impact on the resolution of the problem addressed by NCR 281950. The licensee initiated NCR 332068 to address this issue.

(3) Findings

No findings of significance were identified.

c. Assessment of Self-Assessments and Audits

(1) Inspection Scope

The team reviewed audit reports and self-assessment reports, including those which focused on problem identification and resolution, to assess the thoroughness and self-criticism of the licensee's audits and self-assessments, and to verify that problems identified through those activities were appropriately prioritized and entered into the CAP for resolution in accordance with licensee procedure CAP-NGGC-0201, "Self-Assessment and Benchmark Programs."

(2) Assessment

The team determined that the scopes of assessments and audits were adequate. Self-assessments were generally detailed and critical, as evidenced by findings consistent with the team's independent review. Self-Assessment findings related to issues or weaknesses were entered into the CAP and tracked to completion based on the NCR priority level. Corrective actions for Self-Assessment findings were adequate to address the issues. Generally, the licensee performed evaluations that were technically accurate. Site trend reports were thorough and a low threshold was established for evaluation of potential trends. The team concluded that the self-assessments and audits were an effective tool to identify adverse trends.

(3) Findings

No findings of significance were identified.

d. Assessment of Safety-Conscious Work Environment

(1) Inspection Scope

The team randomly interviewed 34 on-site workers from Maintenance, Security, Operations, Chemistry, and Engineering organizations regarding their knowledge of the corrective action program at Brunswick and their willingness to write NCRs or raise safety concerns. During technical discussions with members of the plant staff, the inspectors conducted interviews to develop a general perspective of the safety-conscious work environment at the site. The interviews were also conducted to determine if any conditions existed that would cause employees to be reluctant to raise safety concerns. The inspectors reviewed the licensee's Employee Concerns Program (ECP) and interviewed the ECP coordinator. Additionally, the team reviewed the latest Safety Culture Assessment to evaluate the thoroughness and self-criticism of the licensee's assessment, and to verify that problems identified were appropriately prioritized and entered into the CAP for resolution. Finally, the inspectors reviewed a sample of completed ECP reports to verify that concerns were being properly reviewed and identified deficiencies were being resolved and entered into the CAP when appropriate.

(2) Assessment

Based on the interviews conducted and the NCRs reviewed, the team determined that licensee management emphasized the need for all employees to identify and report problems using the appropriate methods established within the administrative programs, including the CAP and ECP. These methods were readily accessible to all employees. Based on discussions conducted with a sample of plant employees from various departments, the inspectors determined that employees felt free to raise issues, and that management encouraged employees to place issues into the CAP for resolution. The inspectors did not identify any reluctance on the part of the licensee staff to report safety concerns.

(3) Findings

No findings of significance were identified.

4OA6 Meetings, Including Exit

On May 8, 2009, the inspectors presented the inspection results to Mr. Benjamin C. Waldrep and other members of the site staff. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

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B. Waldrep, Site Vice-President
E. Conway, Securitas Training Supervisor
E. Harkcom, Service Water System Engineer
G. Atkinson, Licensing Supervisor
G. Elders, System Engineer
H. Danforth, Progress Energy Security Supervisor
J. Anderson, Lead Diesel Generator System Engineer
J. Gilbert, System Engineer
J. Westbrook, Self Evaluation Supervisor
M. Alford, System Engineer
M. Annacone, Director Site Operations
N. Smith, Supervisor – Electrical/I&C Systems
P. Dorosko, System Engineer
T. Sherrill, Licensing Engineer
W. Richardson, Diesel Generator System Engineer

NRC

G. Kolcum, Resident Inspector
P. O'Bryan, Senior Resident Inspector
S. Vias, Chief, Reactor Projects Branch 7, DRP

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

None

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Procedures

0AP-025, BNP Integrated Scheduling, Revision 35
0CM-MEC500, "RNA Nitrogen Bottle Replacement for the Nitrogen Backup System", Revision 11
0CM-VSR509, Main Steam Relief Valves Target Rock Model 7567 Air Operators and Pilot Assembly Disassembly, Inspection, and Reassembly, Revision 11
0ENP-53, Instrument Air System Analysis and Tracking Program, Revision 5
0ENP-648, Systems Monitoring and Walkdowns, Revision 4
0PIC-RLY001A, Calibration of GE HFA65 Time Delay Relays, Revision 1
0PLP-20, Post Maintenance Testing Program, Revision 34
0PLP-20, Post Maintenance Testing Program, Revision 35
0PLP-20, Post Maintenance Testing Program, Revision 36
0PM-RLY001, PM on GE HFA Relays, Revision 17
0PT-12.14.L, Diesel Generator 4 Local Control Operability Test, Revision 17
ADM-NGCC-010 1, "Maintenance Rule Program", Revision 20
ADM-NGGC-0203, Preventive Maintenance and Surveillance Testing, Revision 13
Annunciator Panel Procedure 2APP-UA-19, Revision 22
Annunciator Panel Procedure 2APP-UA-20, Revision 22
Annunciator Panel Procedure 2APP-UA-21, Revision 21
Annunciator Panel Procedure 2APP-UA-22, Revision 21
CAP-NGGC-0200, Corrective Action Program, Revision 27
CAP-NGGC-0201, Self-Assessment and Benchmark Programs, Revision 12
CAP-NGGC-0202, Operating Experience Program, Revision 14
CAP-NGGC-0205, Significant Adverse Condition Investigations and Adverse Condition Investigations-Increased Rigor, Revision 9
CAP-NGGC-0206, Corrective Action Program Trending and Analysis, Revision 3
EGR-NGGC-0017, Preparation and Control of Design Analyses and Calculations, Revision 6
EGR-NGGC-0155, Specifying Electrical/I&C Modification Related Tests, Revision 5
MCP-NGGC-0401, Material Acquisition (Procurement, Receiving, and Shipping), Revision 25
NGGD-0010, Nuclear Generation Group Policy for a Strong Safety Culture, Revision 0
NGGD-1400, NGG Self Evaluation Program, Revision 7
NOS-NGGC-0400, Employee Concerns Program, Revision 0
OPS-NGGC-1305, Operability Determinations, Revision 1
TAP-403, "Conduct of Examinations", Revision 10
TAP-411, "Continuing Training Annual/Biennial Exam Development, Administration, and Security", Revision 10

Completed Test Procedures

0PT-12.2D, No. 4 Diesel Generator Monthly Load Test, performed June 27, 2007
0PT-12.14.L, Diesel Generator 4 Local Control Operability Test, performed June 28, 2007
0PT-24.1.2, Service Water Miscellaneous Valve Operability Test, performed April 22, 2008
2MST-DG22R, DG-4 Trip Bypass Logic Test, performed June 27, 2007

Action Requests/Nuclear Condition Reports

AR 224737	NCR 273814	NCR 293395	NCR 317720
AR 240978	NCR 274416	NCR 294500	NCR 317981
AR 245645	NCR 274481	NCR 295298	NCR 318442
AR 249130	NCR 274630	NCR 295963	NCR 319178
AR 267744	NCR 274949	NCR 295971	NCR 320364
AR 268318	NCR 275132	NCR 296474	NCR 321172
AR 269404	NCR 275773	NCR 297360	NCR 321193
AR 271522	NCR 275794	NCR 297715	NCR 323750
AR 271611	NCR 275893	NCR 298179	NCR 324098
AR 276418	NCR 275991	NCR 298727	NCR 324720
AR 278678	NCR 276521	NCR 299138	NCR 325070
AR 294164	NCR 276641	NCR 299967	NCR 325246
AR 303817	NCR 276781	NCR 300842	NCR 325496
AR 305727	NCR 277188	NCR 301064	NCR 325925
AR 329198	NCR 277686	NCR 302322	NCR 326885
NCR 131023	NCR 277910	NCR 304761	NCR 327338
NCR 188870	NCR 277953	NCR 305192	NCR 327475
NCR 196332	NCR 278126	NCR 305697	NCR 329290
NCR 212584	NCR 278187	NCR 305839	NCR 329595
NCR 219625	NCR 278678	NCR 306602	NCR 330193
NCR 231765	NCR 279598	NCR 306620	NCR 330266
NCR 237575	NCR 280578	NCR 306650	NCR 330290
NCR 245864	NCR 280704	NCR 306878	NCR 330408
NCR 249783	NCR 281140	NCR 307182	NCR 330870
NCR 250330	NCR 281363	NCR 307349	NCR 331174
NCR 250736	NCR 281950	NCR 307352	NCR 331174
NCR 255359	NCR 282049	NCR 307361	NCR 331755
NCR 255364	NCR 282452	NCR 307477	NCR 331788
NCR 266093	NCR 282537	NCR 307663	NCR 331824
NCR 266893	NCR 283660	NCR 308876	NCR 331832
NCR 266893	NCR 283838	NCR 309861	NCR 332068
NCR 268357	NCR 284132	NCR 312500	NCR 333704
NCR 268485	NCR 284178	NCR 312549	NCR 334233
NCR 268507	NCR 284886	NCR 312876	NCR 334285
NCR 269625	NCR 286096	NCR 312973	NCR 334294
NCR 270198	NCR 287535	NCR 314598	NCR 334308
NCR 271522	NCR 287869	NCR 315339	NCR 334342
NCR 271611	NCR 287910	NCR 315379	NCR 334583
NCR 272387	NCR 288444	NCR 315426	NCR 334703
NCR 272531	NCR 288815	NCR 315809	NCR 334723
NCR 272703	NCR 289358	NCR 315927	
NCR 273317	NCR 289898	NCR 316094	
NCR 273388	NCR 290180	NCR 316630	

Operating Experience Action Requests

AR214943	AR303966
AR275630	AR304153
AR275634	AR306258
AR280815	AR311568
AR285060	AR319436
AR286333	AR321632
AR292330	AR325120
AR293656	AR332290
AR296469	

Self-Assessment Items

08-15-SP-B, BNP Nuclear Safety Culture Assessment, October 2, 2008

AR 220546
 AR 220547
 AR 220549
 AR 220550
 AR 221479
 AR 294863
 AR 294877
 AR 294878
 AR 294881
 AR 294883
 AR 294887
 AR 297862
 AR 297869

Assessment 217624, Corrective Action Program Self-Assessment, January 19, 2007

Work Orders

00292631, Unit 2 NSW Header Through Wall Leak
 00559774, 2-CAC-TR-4426-1B: Drywell/Suppression Pool Temp Replace Battery
 00587438, EL 2-UA-48-3-4: Enable Annunciator
 00763437, 2-CAC-LI-2699-2: Indicates High Upscale
 01018712, 2-CAC-LT-2699: Investigate and Repair
 01033644, 2-DG4-OVERSPD-STRT-EM-BSTR: Replace on DG4 Engine Air System
 01033645, 2-LO-V461: Replace DG3 Lube Oil Header CHV to Overspeed Boost Cylinder
 01033646, 2-LO-V460: Replace DG4 Lube Oil Header CHV to Overspeed Trip
 01033647, 2-LO-V462: Replace DG4 Overspeed Start Emergency Boost Cylinder
 01033648, 2-DG4-SS-6577-4: Replace Diesel Engine-4 Overspeed Switch
 01033649, 2-DG4-RUN/STOP-CYL-R: Replace on DG4 Air Start System
 01033650, 2-DG4-RUN/STOP-CYL-L: Replace on DG4 Air Start System
 01052304, 2-HD-LSH-73: Repair Switch and Enable 2-UA-04-4-9
 01055388, 2-B11-CRD(26-31): High Temperature at Full Out Position
 01056276, 1-SW-NUC-PMP: Perform Refurbishment of Pump
 01056536, 2-CW-2A-PMP-M: Motor Refurbishment
 01073358, 2-CO-CIS-3075-1: Conductivity Indicator Intermittent Spiking
 01073358, Enable Annunciator 2-UA-28-1-5
 01089232, 1-SW-V129-AO: Rebuild Air Operator

01111890, 2-HD-LT-97: Troubleshoot and Repair Erratic Operation
 01127877, 2-RFA-DT1: Replace Temperature Switch
 01172916-01, Disassemble, Clean, Inspect the 2-SW-V340 Valve
 01179674, 2-VA-2A-RM-TB: EC 68953 – Remove Temporary Modification
 01294930, 2-B11-ZS(10-27): Rod Drift Annunciator comes in for Control Rod 10-27
 01355766, Disable/Enable FWH 4B Level Hi/Lo Alarm
 01441552, Enable Rod Drift Alarm for Control Rod 26-27
 01458232, 1-HD-LSL-885: 1-4B, Feed Water Level
 1375131-01, Replace the 1C CSW Pump Motor
 1432087-01, Replace the 1C CSW Pump Motor
 1437519-03, 1-SW-PV-116: Discharge Strainer Blow Down VLV Failed Open
 1437519-06, 1-SW-PY-116: Replace Solenoid Valve
 1447460, 2-SW-15-12-R-2A: SW Blowdown Header is Leaking
 1447916, UT Scan on 2-SW-2A-CONV-PMP Discharge Head
 WO 1067535
 WO 1415463
 WO 540599
 WO 654557

Engineering Changes

EC52171, Unit 2 RPS, ECCS, and RSDP Inverter DC Power Fuse Replacement, Revision 2
 EC52680, Unit 2 ECCS Division I Inverter DC Power Fuse Replacement, Revision 0
 EC59143, Replace SAT Motor Operated Disconnects with Circuit Breakers, Revision 1
 ED73196, DG4 PMT Adequacy for Overspeed Start Emergency Boost Cylinder (OSEBC)
 Replacement, Revision 0

Other Documents

4060 Q1 2008, System Health Report for Service Water
 4060 U0 Feb09, System Health Report for Service Water
 4060 U0 JUN08, System Health Report for Service Water
 4060 U0 Oct08, System Health Report for Service Water
 6135/6140 Q1 2007, System Health Report for Instrument Air System, July 2007
 6135/6140 Q1 2008, System Health Report for Instrument Air System, February 2008
 6135/6140 Q3 2007, System Health Report for Instrument Air System, October 2007
 6135/6140, System Health Report for Instrument Air System, February 2009
 6135/6140, System Health Report for Instrument Air System, June 2008
 6135/6140, System Health Report for Instrument Air System, November 2008
 Brunswick Engineering Support Section, Self-Evaluation Roll-Up & Trend Analysis, Fourth
 Quarter Roll-Up 2008
 Brunswick Nuclear Plant – BNP Key Performance Indicators: December 2008, January 2009,
 and February 2009
 Brunswick Units 1 & 2 3rd Quarter 2008, Site Trend Report
 Calculation Number OVA-0014, "Appendix R Evaluation", Revision 3
 DBD-43, Service Water System, Revision 8
 Drawing 0-FP-20014, Engine Pneumatic Control Schematic, Revision C
 Drawing F-4093, Diesel Generator Building Units 1 and 2 Ventilation System Plans at EL 23'-0"
 & 50'-0", Revision 0

Drawing Nordberg Part Code 9208-0030, Lube Oil System, Revision C
Email from Jerry Price to Tom Sherrill on DG4 Aux Lube Oil pump question, dated April 16, 2009
Email from Jon Anderson to Norman Smith on Acceptance Testing for DGs Following Boost Cylinder/CV Replacements, dated April 17, 2009
Engineering Calculation 2VA-1084, Evaluation of EDG Pedestal Bearing Temperatures", Revision 0
Engineering Calculation 7453-101-6-VAD-53-F, Temperature Zones in the DG Cells due to Outside Air Temperature of 93°F, 102°F, and 104°F, 04/27/1984
Licensing Basis Document 37.4 for the Diesel Generator Building Ventilation Air System, Revision 6
Maintenance Rule Scoping and Performance Criteria – HVAC Diesel Generator Building
Maintenance Rule Scoping and Performance Criteria – Instrument Air System
Material Evaluation ME06052, Battery, 3.6 Volt, 80 mA, Revision 2
PRR 334635, ELU test procedure acceptance criteria
SD-37.4, Diesel Generator Building Heating and Ventilation System, Revision 3
SD-39, Emergency Diesel Generators, Revision 7
SD-43, Service Water System, Revision 15
Specification NCP-G-0001, Common Diesel Fuel Oil (Grade 2-D) Testing Specification, Revision 3
Sulzer As Found Report and Repair Plan for Service Water Bowl Assembly, Sulzer Job Number 08C02661, Revision 2
System Engineer Walk-down Plan 8075 – DG HVAC

BRUNSWICK PI&R INSPECTION INFORMATION REQUEST

An initial information request was provided to the licensee via a letter on February 12, 2009 (ADAMS Accession Number ML090440038). The following information requests were follow-up requests provided to the licensee via email prior to the inspection onsite.

Joel Rivera-Ortiz

From: Joel Rivera-Ortiz
Sent: Wednesday, April 01, 2009 3:01 PM
To: 'Murray, William R. (Bill)'
Subject: RE: Brunswick PI&R Inspection Information

Bill,

Thanks for the 2nd CD with additional information. One of the inspectors need some additional items for his preparation week. Could you please email the items requested below to: Robert.Berryman@nrc.gov ?

1) Complete NCR Packages including all CAs and assignments for the following NCR numbers:

312500
 312876
 312973
 292232

2) Copy of EGR-NGGC-0155

3) List of all modifications performed on safety related components from 2004-present.

4) List of all systems currently in Maintenance Rule (a)(1) status.

Thanks,

Joel E. Rivera-Ortiz, PE
Sr. Project Inspector

US Nuclear Regulatory Commission
 Region II, Division of Reactor Projects, Branch 7
 61 Forsyth Street, SW, Suite 23T85
 Atlanta, GA 30303-8931

Tel. (404) 562-4825
 E-Mail: Joel.Rivera-Ortiz@nrc.gov

From: Murray, William R. (Bill) [<mailto:Bill.Murray2@pgnmail.com>]
Sent: Friday, March 27, 2009 4:21 PM
To: Joel Rivera-Ortiz
Subject: Brunswick PI&R Inspection Information

Joel,

I have just mailed, via UPS Next Day Shipping, a CD-ROM containing the information for your PI&R inspection, including the additional items you requested during your onsite visit. If you have questions about any of the newly added items, or if I overlooked including something, please call me. The UPS tracking number for the package is 1Z 218 939 22 1005 6953.

William R. (Bill) Murray
 Progress Energy Carolinas, Inc.
 Licensing/Regulatory Programs - Brunswick Plant
 Phone 910-457-2842
 E-mail william.murray@pgnmail.com

Joel Rivera-Ortiz

From: Joel Rivera-Ortiz
Sent: Thursday, April 09, 2009 8:11 AM
To: 'tom.sherrill@pgnmail.com'
Cc: Robert Berryman
Subject: NRC PI&R Inspection: Request for Information

Hi Tom,

I hope you are doing well. Here is some information that we need for our inspection preparation week. Could you please email the items listed below to Rob Berryman at Robert.Berryman@nrc.gov? In addition, could you give Rob a call at 404-562-4817? He has some questions about the information you provided before for his assigned area.

- 1) EC 0000052177 Unit 2 RPS, ECCS & RSDP Inverter DC Power Fuse Replacement
- 2) EC 0000052680 Unit 2 ECCS DIV I Inverter DC Power Fuse Replacement (Child to EC 52177)
- 3) EC 0000059143 Replace SAT Motor Operated Disconnects with Circuit Breakers

Thanks for your support,

Joel E. Rivera-Ortiz, PE
Sr. Reactor Engineer Inspector

US Nuclear Regulatory Commission
Region II, Division of Reactor Projects, Branch 7
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

Tel. (404) 562-4825
E-Mail: Joel.Rivera-Ortiz@nrc.gov

Joel Rivera-Ortiz

From: Joel Rivera-Ortiz
Sent: Tuesday, April 14, 2009 1:06 PM
To: 'tom.sherrill@pgnmail.com'
Subject: Request for Information: NRC PI&R Inspection

Dear Mr. Sherrill,

The following is a list of documents that we will need during the first week of inspection. We would like to have these files available upon arrival on Monday (4/20/2009), if practical. Please provide these files to me or Mr. Steve Rose. If you have any questions, please do not hesitate to contact me.

Inspector: Steve Rose

Document Request (electronic format preferred):EP related NCR's:

00275773 TSC/EOF EDG TRANSFER SWITCH FAILURE
 00278927 NAS ASSESSMENT B-TS/OL-08-01-W1, PNSC CONDUCT & ADMIN.
 00282608 NAS ASM'T B-DC-08-01-W1, HUMAN PERFORMANCE
 00288444 EOF/TSC VENTILATION DAMPER FAILURE
 00294500 NAS ENGINEERING ASSESSMENT B-ES-08-01 WEAKNESS 2
 00296474 DOSIMETRY CHANGE MANAGEMENT AND EP RESPONSE
 00299138 SIMULATOR TRAINING EOP REVIEW
 00307349 2008 EP EXERCISE DEFICIENCY - ONSITE PROTECTIVE MEASURES
 00307352 2008 EP EXERCISE - MISSED ACCURACY NOTIFICATION
 00308875 NAS ASM'T B-EP-08-01-W2, COMMAND AND CONTROL
 00308876 NAS ASM'T B-EP-08-01-W3, SEVERE WEATHER

EP related AR's:

00301064 TEAM 5 EP DRILL - SITE AREA EMERGENCY 2 MINUTES LATE NA
 00307182 ADVERSE TREND IN EP DRILL/EXERCISE PERFORMANCE PI N/A
 00307352 2008 EP EXERCISE - MISSED ACCURACY NOTIFICATION NA
 00307349 2008 EP EXERCISE DEFICIENCY - ONSITE PROTECTIVE MEASURES NA
 00296474 DOSIMETRY CHANGE MANAGEMENT AND EP RESPONSE NA

Service Water related NCR's:

NCR 271522 LIVE OYSTER GROWTH IN UNIT 1 NUCLEAR SW HEADER
 NCR 271611 ADVERSE TREND IN BNP SERVICE WATER PERFORMANCE

Sincerely,

Joel E. Rivera-Ortiz, P.E.
Sr. Reactor Inspector

Region II/DRP/RPB7
 Tel. (404) 562-4825
 E-Mail: Joel.Rivera-Ortiz@nrc.gov

Joel Rivera-Ortiz

From: Joel Rivera-Ortiz
Sent: Wednesday, April 15, 2009 8:31 AM
To: 'tom.sherrill@pgnmail.com'
Subject: Request for Information: NRC PI&R Inspection

Dear Mr. Sherrill,

The following is a list of additional documents that we will need for the PI&R inspection. We would like to have these files available for review during the first week of inspection onsite, if practical. If you have any questions, please do not hesitate to contact me.

Requesting Inspector: Joel Rivera-Ortiz

Document Request: (electronic format preferred)

1) Env. & Chemistry related NCRs:

274481	272387	273317	273388	275893
278126	315339	280578	275794	319178
317981	315927	314598	312549	306650
306602	298179	275991	274416	272703
273235	286096			

2) Self Assessment related NCRs:

294863	294877	294878	294881	294883
294887	297862	297869	220545	220546
220547	221479	220664	220549	220550

3) Operating Experience related ARs:

AR286333	AR280815	AR292330	AR285060	AR296397
AR296716	AR312333	AR306258	AR319436	AR318325
AR282643	AR275634	AR275630	AR290473	AR313509
AR311568	AR285954	AR306231	AR303966	AR293656

4) ARs for the following NRC Operating Experience items

- Part 21 2008-16: Fisher Valve Actuator Nitrile/Nylon Diaphragms (Part No. 1R6375X0072) Inadequately Cured and Inappropriately Overstressed
- Part 21 2008-22: Safety-Related Power Supplies Have Wrong Capacitor
- Part 21 2008-25: Dimensionally Verified Commercial Grade Items
- Part 21 2009-05: Defective HK and K-Line Circuit Breaker Tension Springs
- IN 2009-02: Biodiesel in Fuel Oil could Adversely Impact Diesel Engine Performance
- IN 2009-04: Age-Related Constant Support Degradation

5) Additional list of NCRs

Please provide a list of all NCRs generated from March 11, 2009 to April 17, 2009. Please include the following information for each NCR: *NCR Number, Priority, Brief Problem Description, System, Department, Status, Discovery Date, and NCR origination date.* If possible, please provide this information in a format that can be converted or exported to spreadsheet software.

Thanks for your support,

Joel E. Rivera-Ortiz, P.E.
Sr. Reactor Inspector

Region II/DRP/RPB7
Tel. (404) 562-4825
E-Mail: Joel.Rivera-Ortiz@nrc.gov

Joel Rivera-Ortiz

From: Joel Rivera-Ortiz
Sent: Wednesday, April 15, 2009 9:07 AM
To: 'tom.sherrill@pgnmail.com'
Subject: Information Request: NRC PI&R Inspection

Dear Mr. Sherrill,

The following is a list of additional documents that we will need for the PI&R inspection. We would like to have these files available for review during the first week of inspection onsite. If you have any questions, please do not hesitate to contact me.

Requesting Inspector: Scott Atwater

Document Request: (electronic format preferred)

AR188870	AR196332-04	AR00226332-20	WO 1033355-01
AR249783	AR266893	AR268485	AR268507
AR269625	AR270198	AR273814	AR274630
AR274949	AR276521	AR276641	AR276781
AR277686	AR278187	AR281140	AR282049
AR282452	AR282537	AR284178	AR285911
AR289898	AR299967	AR300126	AR300842
AR304761	AR306878	AR309861	AR315426
AR316630	AR317720		

Thanks for your support,

Joel E. Rivera-Ortiz, P.E.
Sr. Reactor Inspector

Region II/DRP/RPB7
Tel. (404) 562-4825
E-Mail: Joel.Rivera-Ortiz@nrc.gov