



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

July 28, 2009

Rafael Flores, Senior Vice President  
and Chief Nuclear Officer  
Luminant Generation Company, LLC  
Comanche Peak Steam Electric Station  
P.O. Box 1002  
Glen Rose, TX 76043

Subject: COMANCHE PEAK STEAM ELECTRIC STATION - NRC INTEGRATED  
INSPECTION REPORT 05000445/2009003 AND 05000446/2009003

Dear Mr. Flores:

On June 20, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Comanche Peak Steam Electric Station. The enclosed integrated inspection report documents the inspection findings, which were discussed on July 2, 2009, with you and other members of your staff.

The inspection examined 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. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents one NRC-identified finding of very low safety significance (Green). This finding was determined to involve violations of NRC requirements. However, because of the very low safety significance and because it is entered into your corrective action program, the NRC is treating this finding as a noncited violation, consistent with Section VI.A.1 of the NRC Enforcement Policy. If you contest the noncited violation or the significance of the noncited violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 612 E. Lamar Blvd, Suite 400, Arlington, Texas, 76011-4125; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the Comanche Peak Steam Electric Station facility. In addition, if you disagree with the characterization of any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region IV, and the NRC Resident Inspector at the Comanche Peak Steam Electric Station. The information you provide will be considered in accordance with Inspection Manual Chapter 0305.

In accordance with 10 CFR 2.390 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 component of 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/**

Wayne C. Walker, Chief  
Project Branch A  
Division of Reactor Projects

Docket: 50-445: 50-446  
License: NPF-87; NPF-89

Enclosure:  
NRC Inspection Report 05000445/2009003 and 005000446/2009003  
w/Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 50-445, 50-446

License: NPF-87, NPF-89

Report: 05000445/2009003 and 05000446/2009003

Licensee: Luminant Generation Company LLC

Facility: Comanche Peak Steam Electric Station, Units 1 and 2

Location: FM-56, Glen Rose, Texas

Dates: March 22 through June 20, 2009

Inspectors: J. Kramer, Senior Resident Inspector  
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G. Guerra, Emergency Preparedness Inspector, Plant Support Branch 1  
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M. Haire, Enforcement Specialist, Allegation and Enforcement Staff

Approved By: Wayne Walker, Chief, Project Branch A  
Division of Reactor Projects

## SUMMARY OF FINDINGS

IR 05000445/2009003, 05000446/2009003; 03/22/2009 - 06/20/2009; Comanche Peak Steam Electric Station, Units 1 and 2, Identification and Resolution of Problems.

The report covered a 3-month period of inspection by resident inspectors and announced baseline inspections by region based inspectors. One Green noncited violation was identified. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609, "Significance Determination Process." Findings for which the significance determination process does not apply may be Green or be assigned a severity level after NRC management review. 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.

### **A. NRC-Identified Findings and Self-Revealing Findings**

Cornerstone: Barrier Integrity

- Green. The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criterion V, for the failure to follow procedures that require initiating a Smart Form for damage to safety-related equipment. The licensee failed to initiate a Smart Form when multiple loose parts were discovered in the steam generators during refueling outages that had damaged the tubes to varying degrees. Therefore, the licensee did not identify sources of loose parts and potential corrective actions. The licensee entered the finding into their corrective action program as Smart Form SMF-2009-001069-00.

The finding was more than minor because if the licensee continues to fail to document damage to safety-related equipment in the Smart Form database, there is potential that this could lead to a more significant safety concern, in that, the cause of the damage will not be evaluated and corrected. Once entered into the Smart Form database, a review of the loose parts was conducted. Although the licensee could not identify sources for any of the parts, similar reviews in the future could reasonably produce corrective actions that would not have been taken without the reviews. Using NRC Inspection Manual Chapter 0609, Appendix J, "Steam Generator Tube Integrity Findings Significance Determination Process," the finding was determined to be of very low safety significance because none of the tested tubes failed the in situ pressure tests. The cause of this finding was related to the Problem Identification and Resolution crosscutting component of the corrective action program, in that, the licensee failed to enter the issue into their corrective action program [P1.a] (Section 40A2).

### **B. Licensee-Identified Violations**

None

## REPORT DETAILS

### Summary of Plant Status

Comanche Peak Steam Electric Station Unit 1 operated at approximately 100 percent power until May 2, 2009, when the grid dispatcher requested the unit reduce power to approximately 75 percent power. The unit returned to approximately 100 percent power on May 9, 2009, and operated at that power level for the remainder of the reporting period.

Comanche Peak Steam Electric Station Unit 2 operated at approximately 100 percent power until May 13, 2009, when the grid dispatcher requested the unit reduce power to approximately 70 percent power. The unit returned to approximately 100 percent power on May 18, 2009, and operated at that power level for the remainder of the reporting period.

### 1. REACTOR SAFETY

#### Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

#### 1R01 Adverse Weather Protection (71111.01)

##### .1 Summer Readiness for Offsite and Alternate ac Power

##### a. Inspection Scope

The inspectors performed a review of the licensee's preparations for summer weather for selected systems, including conditions that could lead to loss-of-offsite power and conditions that could result from high temperatures. The inspectors reviewed the licensee's procedures for operation and continued availability of offsite power, including communications protocols between operations and the transmission system operator to verify that the appropriate information is exchanged when issues arise that could impact the offsite power system. The inspectors ensured that:

- Actions were specified for notification that the posttrip voltage of the switchyard would not be acceptable to assure continued operation of safety-related loads without transferring to the onsite power supply
- Compensatory actions were required if it was not possible to predict the posttrip voltage in the switchyard
- Actions were specified to reassess plant risk based on maintenance activities which could impact grid reliability or the ability of the transmission system to provide offsite power
- Communications were required between the transmission grid controller and operations when changes at the site could impact the transmission system or when the capability of the transmission system to provide adequate voltage is challenged

On June 9, 2009, the inspectors performed a walkdown of the switchyard with plant personnel to observe the material condition of the offsite power sources. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one readiness for summer weather affect on offsite and alternate ac power sample as defined in Inspection Procedure 71111.01-05.

b. Findings

No findings of significance were identified.

.2 Readiness for Impending Adverse Weather Conditions

a. Inspection Scope

Since a severe thunderstorm watch was forecast in the vicinity of the facility for March 25, 2009, the inspectors reviewed the licensee's overall preparations/protection for the expected weather conditions. The inspectors evaluated the licensee staff's preparations against the site's procedures and determined that the staff's actions were adequate. During the inspection, the inspectors focused on plant-specific design features and the licensee's procedures used to respond to specified adverse weather conditions. The inspectors also toured the plant grounds to look for any loose debris that could become missiles during a tornado. The inspector's evaluated operator staffing and accessibility of controls and indications for those systems required to control the plant. The inspectors also reviewed a sample of corrective action program items to verify that the licensee identified adverse weather issues at an appropriate threshold and dispositioned them through the corrective action program in accordance with station corrective action procedures. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one readiness for impending adverse weather condition sample as defined in Inspection Procedure 71111.01-05.

b. Findings

No findings of significance were identified.

**1R04 Equipment Alignments (71111.04)**

Partial Equipment Walkdowns

a. Inspection Scope

The inspectors performed partial system walkdowns of the following risk-significant systems:

- May 12, 2009, Unit 2, train A diesel generator while the Unit 2, train B diesel generator was unavailable during maintenance
- May 28, 2009, Unit 1, motor-driven auxiliary feedwater pumps 1-01 and 1-02 while turbine-driven auxiliary feedwater pump 1-01 was unavailable for maintenance
- June 4, 2009, Unit 2, residual heat removal pump 2-02 following maintenance

The inspectors selected these systems based on their risk significance relative to the reactor safety cornerstones at the time they were inspected. The inspectors attempted to identify any discrepancies that could affect the function of the system and, therefore,

potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, Final Safety Analysis Report, technical specification requirements, outstanding work orders, Smart Forms, and the impact of ongoing work activities on redundant trains of equipment in order to identify conditions that could have rendered the systems incapable of performing their intended functions. The inspectors also walked down accessible portions of the systems to verify system components and support equipment were aligned correctly and operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no obvious deficiencies. The inspectors also verified that the licensee had properly identified and resolved equipment alignment problems that could cause initiating events or impact the capability of mitigating systems or barriers and entered them into the corrective action program with the appropriate significance characterization.

These activities constituted completion of three partial system walkdown samples as defined in Inspection Procedure 71111.04-05.

b. Findings

No findings of significance were identified.

**1R05 Fire Protection (71111.05)**

Quarterly Fire Inspection Tours

a. Inspection Scope

The inspectors conducted fire protection walkdowns in the following risk-significant plant areas:

- April 13, 2009, fire zone AA99e, Unit 2, spent fuel pool
- May 4, 2009, fire zone 104b, service water intake structure
- May 28, 2009, fire zone SD9, Unit 1, train A switchgear room

The inspectors reviewed areas to assess if licensee personnel had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant; effectively maintained fire detection and suppression capability; maintained passive fire protection features in good material condition; and had implemented adequate compensatory measures for out of service, degraded or inoperable fire protection equipment, systems, or features, in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall contribution to internal fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to affect equipment that could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the attachment, the inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use, that fire detectors and sprinklers were unobstructed, that transient material loading was within the analyzed limits, and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. Specific documents reviewed during this inspection are listed in the attachment.

These activities constituted completion of three quarterly fire-protection inspection samples as defined in Inspection Procedure 71111.05-05.

b. Findings

No findings of significance were identified.

**1R07 Heat Sink Performance (71111.07)**

Annual Review

a. Inspection Scope

The inspectors reviewed licensee programs, verified performance against industry standards, and reviewed critical operating parameters and maintenance records for the diesel generator 2-02 jacket water heat exchanger. The inspectors verified that performance tests were satisfactorily conducted for the heat exchangers; the licensee utilized the periodic maintenance method outlined in Electric Power Research Institute Report NP 7552, "Heat Exchanger Performance Monitoring Guidelines"; the licensee properly utilized biofouling controls; the licensee's heat exchanger inspections adequately assessed the state of cleanliness of their tubes; and the heat exchanger was correctly categorized under 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one heat sink inspection sample as defined by IP 71111.07-05.

b. Findings

No findings of significance were identified.

**1R11 Licensed Operator Requalification Program (71111.11)**

.1 Quarterly Licensed Operator Requalification Program Inspection

a. Inspection Scope

On April 28, 2009, the inspectors observed a crew of licensed operators in the plant's simulator to verify that operator performance was adequate, evaluators were identifying and documenting crew performance problems and training was being conducted in accordance with licensee procedures. The inspectors evaluated the following areas:

- Licensed operator performance
- Crew's clarity and formality of communications
- Crew's ability to take timely actions in the conservative direction
- Crew's prioritization, interpretation, and verification of annunciator alarms
- Crew's correct use and implementation of abnormal and emergency procedures
- Control board manipulations
- Oversight and direction from supervisors
- Crew's ability to implement appropriate emergency plan actions and notifications

The inspectors compared the crew's performance in these areas to pre-established operator action expectations and successful critical task completion requirements. In addition, the inspectors reviewed Smart Form 2009-001593-00.

These activities constituted completion of one quarterly licensed operator requalification program sample as defined in Inspection Procedure 71111.11.

b. Findings

No findings of significance were identified.

.2 Biennial Licensed Operator Requalification Program Inspection

a. Inspection Scope

To assess the performance effectiveness of the licensed operator requalification program, the inspectors conducted personnel interviews, reviewed both the operating tests and written examinations, reviewed randomly selected medical and watchstanding proficiency records, and observed ongoing operating test activities.

The onsite inspection effort occurred November 17-20, 2008. During this time, the inspectors interviewed licensee personnel to determine their understanding of the policies and practices for administering requalification examinations. The inspectors also reviewed operator performance on the periodic written examinations and annual operating tests. These reviews included observations of portions of the operating tests by the inspectors. The operating tests observed included ten job performance measures and two scenarios that were used in the current biennial requalification cycle. These observations allowed the inspectors to assess the licensee's effectiveness in conducting the operating test to ensure operator mastery of the training program content.

The results of these examinations were reviewed to determine the effectiveness of the licensee's appraisal of operator performance and to determine if feedback of performance analyses into the requalification training program was being accomplished. The inspectors interviewed members of the training department and reviewed minutes of the Program Review Board meetings to assess the responsiveness of the licensed operator requalification program to incorporate the lessons learned from both plant and industry events. The inspectors also reviewed a sample of licensed operator annual medical forms and procedures governing the medical examination process for conformance to 10 CFR 55.53, a sampling of the licensed operator requalification program feedback system, and the remediation process records.

In addition to the above, the inspectors reviewed examination security measures, simulator fidelity and existing logs of simulator deficiencies.

From January 14 to April 15, 2009, the inspectors performed an in-office review of the biennial written examinations and reviewed the overall pass/fail results of the individual job performance measure operating tests, simulator operating tests, and written examinations administered by the licensee during the operator licensing requalification cycles and biennial examination. Final examination results were assessed to determine if they were consistent with the guidance contained in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9, Supplement 1, and NRC Manual Chapter 0609, Appendix I, "Operator Requalification Human Performance Significance Determination Process." Thirteen separate crews participated in simulator operating tests, and job performance measure operating tests, totaling 76 licensed operators. Seventy-two operators took the written examinations. (Two licenses were lost due to attrition and two license holders entered the initial license class.) There was one failure on the written examination. There was one failure on the simulator operating

tests and two failures on the individual job performance measure operating tests. All of the failures on the operating tests were successfully remediated. The individual that failed the written examination was removed from licensed duties and the individual's license was terminated.

These activities constitute completion of one biennial licensed operator requalification program sample as defined in Inspection Procedure 71111.11.

b. Findings

No findings of significance were identified.

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

a. Inspection Scope

The inspectors reviewed licensee personnel's evaluation and management of plant risk for the maintenance and emergent work activities affecting risk-significant and safety-related equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- May 12, 2009, Unit 2, diesel generator 2-01 maintenance
- May 28, 2008, Unit 1, turbine-driven auxiliary feedwater pump 1-01 maintenance and concurrent DeCordova 138 kV line outage
- June 3, 2009, Unit 1 diesel generator 1-02 maintenance and concurrent DeCordova 138 kV line outage

The inspectors selected these activities based on potential risk significance relative to the reactor safety cornerstones. As applicable for each activity, the inspectors verified that licensee personnel performed risk assessments as required by 10 CFR 50.65(a)(4) and that the assessments were accurate and complete. When licensee personnel performed emergent work, the inspectors verified that the licensee personnel promptly assessed and managed plant risk. The inspectors reviewed the scope of maintenance work, discussed the results of the assessment with the licensee's probabilistic risk analyst or shift technical advisor, and verified plant conditions were consistent with the risk assessment. The inspectors also reviewed the technical specification requirements and inspected portions of redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met.

These activities constituted completion of three maintenance risk assessments and emergent work control inspection samples as defined in Inspection Procedure 71111.13-05.

b. Findings

No findings of significance were identified.

## **1R15 Operability Evaluations (71111.15)**

### a. Inspection Scope

The inspectors reviewed the following issues:

- SMF-2009-001369-00, Balance of Plant Foreign Material Events
- SMF-2009-002422-00, Unit 1 motor-driven auxiliary feedwater pump 1-01 in-board motor bearing high oil level

The inspectors selected these potential operability issues based on the risk-significance of the associated components and systems. The inspectors evaluated the technical adequacy of the evaluations to ensure that technical specification operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the Technical Specifications and Final Safety Analysis Report to the licensee's evaluations, to determine whether the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations. Additionally, the inspectors reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations. Specific documents reviewed during this inspection are listed in the attachment.

These activities constituted completion of two operability evaluation inspection samples as defined in Inspection Procedure 71111.15-05.

### b. Findings

No findings of significance were identified.

## **1R18 Plant Modifications (71111.18)**

### a. Inspection Scope

The inspectors reviewed permanent modifications to verify that the safety functions of important safety systems were not degraded.

The inspectors reviewed the service water intake structure permanent plant modification to place screens over ventilation openings in the pump deck for insect control. In addition, the inspectors reviewed the permanent plant modification to the main steam safety valve vent stacks that reduced their height by 7½ feet to eliminate the possibility of the stacks crimping due to a tornado missile.

The inspectors reviewed key affected parameters associated with materials/replacement components, heat removal, equipment protection from hazards, operations, flow paths, pressure boundary, ventilation boundary, structural, process medium properties, licensing basis, and failure modes for the modification listed below. The inspectors verified that modification preparation, staging, and implementation did not impair emergency/abnormal operating procedure actions, key safety functions, or operator

response to loss of key safety functions; systems, structures and components' performance characteristics still meet the design basis, the appropriateness of modification design assumptions, and the modification test acceptance criteria will be met; and licensee personnel identified and implemented appropriate corrective actions associated with permanent plant modifications. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two permanent plant modification inspection samples as defined in Inspection Procedure 71111.18-05.

b. Findings

No findings of significance were identified.

**1R19 Postmaintenance Testing (71111.19)**

a. Inspection Scope

The inspectors reviewed the following postmaintenance activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

- March 31, 2009, turbine-driven auxiliary feedwater system steam supply check valve following maintenance
- March 23, 2009, centrifugal charging pump 1-01 run following overcurrent relay testing
- May 12, 2009, diesel generator 2-01 run following jacket water heat exchanger maintenance

The inspectors selected these activities based upon the structure, system, or component's ability to affect risk. The inspectors evaluated the activities to ensure the testing was adequate for the maintenance performed, the acceptance criteria were clear, and the test ensured equipment operational readiness.

The inspectors evaluated the activities against technical specifications, the Final Safety Analysis Report, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications to ensure that the test results adequately ensured that the equipment met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with postmaintenance tests to determine whether the licensee was identifying problems and entering them into the corrective action program and that the problems were being corrected commensurate with their importance to safety. Specific documents reviewed during this inspection are listed in the attachment.

These activities constituted completion of three postmaintenance testing inspection samples as defined in Inspection Procedure 71111.19-05.

b. Findings

No findings of significance were identified.

## 1R22 Surveillance Testing (71111.22)

### a. Inspection Scope

The inspectors reviewed the Final Safety Analysis Report, procedure requirements, and technical specifications to ensure that the surveillance activities listed below demonstrated that the systems, structures, and/or components tested were capable of performing their intended safety functions. The inspectors either witnessed or reviewed test data to verify that the significant surveillance test attributes were adequate to address the following:

- Preconditioning
- Evaluation of testing impact on the plant
- Acceptance criteria
- Test equipment
- Procedures
- Jumper/lifted lead controls
- Test data
- Testing frequency and method demonstrated technical specification operability
- Test equipment removal
- Restoration of plant systems
- Fulfillment of ASME Code requirements
- Updating of performance indicator data
- Reference setting data
- Annunciators and alarms setpoints

The inspectors also verified that licensee personnel identified and implemented any needed corrective actions associated with the following surveillance testing:

- March 23, 2009, Unit 1, centrifugal charging pump 1-01 breaker overcurrent relay test
- March 24, 2009, Unit 2, centrifugal charging pump 2-02 relief valve inservice test
- May 7, 2009, Unit 2, control rod repositioning
- June 3, 2009, Unit 1, diesel generator 1-02 monthly surveillance test

Specific documents reviewed during this inspection are listed in the attachment.

These activities constituted completion of four surveillance testing inspection samples (one in-service test sample and three routine surveillance testing samples) as defined in Inspection Procedure 71111.22-05.

### b. Findings

No findings of significance were identified.

## 1EP1 Exercise Evaluation (71114.01)

### a. Inspection Scope

The inspectors reviewed the objectives and scenario for the 2009 biennial emergency plan exercise to determine if the exercise would acceptably test major elements of the emergency plan. The scenario demonstrated the licensee personnel's capability to implement their emergency plan by simulating a loss of a station transformer, a plant fire lasting longer than fifteen minutes, the failure of two control rods to insert following a reactor trip resulting in core damage, a steam generator tube leak that escalates to a tube rupture, fission product barrier failures, and a radiological release to the environment via a partially open steam generator safety valve.

The inspectors evaluated exercise performance by focusing on the risk-significant activities of event classification, offsite notification, recognition of offsite dose consequences, and development of protective action recommendations in the control room simulator and the following emergency response facilities:

- Technical Support Center
- Operations Support Center
- Emergency Operations Facility

The inspectors assessed recognition of, and response to, abnormal and emergency plant conditions, the transfer of decision making authority and emergency function responsibilities between facilities, onsite and offsite communications, protection of emergency workers, emergency repair evaluation and capability, and the overall implementation of the emergency plan to protect public health and safety and the environment. The inspectors reviewed the current revision of the facility emergency plan, and emergency plan implementing procedures associated with the licensee's emergency response facilities and associated emergency functions. The inspectors reviewed scenarios and evaluation reports for simulator and other drills conducted between January 2007 and February 2009, to identify similarities with the 2009 Biennial Exercise and repeat performance issues.

The inspectors compared the observed exercise performance with the requirements in the site emergency plan, 10 CFR 50.47(b), 10 CFR Part 50, Appendix E, and with the guidance in the emergency plan implementing procedures and other federal guidance.

The inspectors attended post-exercise critiques in each emergency response facility to evaluate the licensee's initial self-assessment of exercise performance. The inspectors also attended a subsequent formal presentation of critique items to plant management. The specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one exercise evaluation sample as defined in Inspection Procedure 71114.01-05.

### b. Findings

No findings of significance were identified.

#### **1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)**

a. Inspection Scope

The inspectors performed an onsite review of Comanche Peak Steam Electric Station Emergency Plan, Revision 37. This revision added descriptions of the Alternate Emergency Operations Facility, clarified the use of radio communications with ambulance services and local hospitals, deleted references to an internal company telephone circuit, and updated licensee and offsite agency titles throughout the document.

This revision was compared to the previous revision, to the criteria of NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, and to the standards in 10 CFR 50.47(b) to determine if the revision adequately implemented the requirements of 10 CFR 50.54(q). This review was not documented in a safety evaluation report and did not constitute approval of licensee-generated changes; therefore, this revision is subject to future inspection.

These activities constitute completion of one emergency action level and emergency plan changes sample as defined in Inspection Procedure 71114.04-05.

b. Findings

No findings of significance were identified.

#### **4OA1 Performance Indicator Verification (71151)**

.1 Data Submission Issue

a. Inspection Scope

The inspectors performed a review of the data submitted by the licensee for the first quarter 2009 performance indicators for any obvious inconsistencies prior to its public release in accordance with NRC Inspection Manual Chapter 0608, "Performance Indicator Program."

This review was performed as part of the inspectors' normal plant status activities and, as such, did not constitute a separate inspection sample.

b. Findings

No findings of significance were identified.

.2 Safety System Functional Failures

a. Inspection Scope

The inspectors sampled licensee submittals for the safety system functional failures performance indicator for Units 1 and 2 for the period from the second quarter 2008 through the first quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in Nuclear Energy Institute Document 99-02, "Regulatory Assessment

Performance Indicator Guideline,” Revision 5, and NUREG-1022, “Event Reporting Guidelines 10 CFR 50.72 and 50.73,” definitions and guidance were used. The inspectors reviewed the licensee’s operator narrative logs, operability assessments, maintenance rule records, maintenance work orders, issue reports, event reports and NRC Integrated Inspection reports for the period of April 1, 2008, through March 31, 2009, to validate the accuracy of the submittals. The inspectors also reviewed the licensee’s issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of two safety system functional failures samples as defined by Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.3 Reactor Coolant System Specific Activity

a. Inspection Scope

The inspectors sampled licensee submittals for the reactor coolant system specific activity performance indicator for Units 1 and 2 for the period from the second quarter 2008 through the first quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in Nuclear Energy Institute Document 99-02, “Regulatory Assessment Performance Indicator Guideline,” Revision 5, was used. The inspectors reviewed the licensee’s reactor coolant system chemistry samples, technical specification requirements, issue reports, event reports and NRC integrated inspection reports for the period of April 1, 2008, through March 31, 2009, to validate the accuracy of the submittals. The inspectors also reviewed the licensee’s issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. In addition to record reviews, the inspectors observed a chemistry technician obtain and analyze a reactor coolant system sample. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of two reactor coolant system specific activity samples as defined by Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.4 Reactor Coolant System Leakage

a. Inspection Scope

The inspectors sampled licensee submittals for the reactor coolant system leakage performance indicator for Units 1 and 2 for the period from the second quarter 2008 through the first quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in Nuclear Energy Institute Document 99-02, “Regulatory Assessment

Performance Indicator Guideline,” Revision 5, was used. The inspectors reviewed the licensee’s operator logs, reactor coolant system leakage tracking data, issue reports, event reports, and NRC integrated inspection reports for the period of April 1, 2008, through March 31, 2009, to validate the accuracy of the submittals. The inspectors also reviewed the licensee’s issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of two reactor coolant system leakage samples as defined by Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.5 Drill/Exercise Performance (EP01)

a. Inspection Scope

The inspectors sampled licensee submittals for the Drill and Exercise Performance, performance indicator for the period April 2008 through December 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in Nuclear Energy Institute Document 99-02, “Regulatory Assessment Performance Indicator Guideline,” Revision 5, was used. The inspectors reviewed the licensee’s records associated with the performance indicator to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the Nuclear Energy Institute guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the performance indicator; assessments of performance indicator opportunities during predesignated control room simulator training sessions and other drills. The specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one drill/exercise performance sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.6 Emergency Response Organization Drill Participation (EP02)

a. Inspection Scope

The inspectors sampled licensee submittals for the Emergency Response Organization Drill Participation performance indicator for the period April 2008 through December 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in Nuclear Energy Institute Document 99-02, “Regulatory Assessment Performance Indicator Guideline,” Revision 5, was used. The inspectors reviewed the licensee’s records associated with the performance indicator to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the Nuclear Energy

Institute guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the performance indicator, rosters of personnel assigned to key emergency response organization positions, and exercise participation records for twenty-two key emergency response organization position. The specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one emergency response organization drill participation sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.7 Alert and Notification System (EP03)

a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System performance indicator for the period April 2008 through December 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's records associated with the performance indicator to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the Nuclear Energy Institute guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the performance indicator and the results of periodic alert notification system operability tests. The specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one alert and notification system sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

**40A2 Identification and Resolution of Problems (71152)**

**Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness, Public Radiation Safety, Occupational Radiation Safety, and Physical Protection**

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As part of the various baseline inspection procedures discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that they were being entered into the licensee's corrective action program at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and

addressed. The inspectors reviewed attributes that included: the complete and accurate identification of the problem; the timely correction, commensurate with the safety significance; the evaluation and disposition of performance issues, generic implications, common causes, contributing factors, root causes, extent of condition reviews, and previous occurrences reviews; and the classification, prioritization, focus, and timeliness of corrective. Minor issues entered into the licensee's corrective action program because of the inspectors' observations are included in the attached list of documents reviewed.

These routine reviews for the identification and resolution of problems did not constitute any additional inspection samples. Instead, by procedure, they were considered an integral part of the inspections performed during the quarter and documented in Section 1 of this report.

b. Findings

No findings of significance were identified.

.2 Daily Corrective Action Program Reviews

a. Inspection Scope

In order to assist with the identification of repetitive equipment failures and specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into the licensee's corrective action program. The inspectors accomplished this through review of the station's daily corrective action documents.

The inspectors performed these daily reviews as part of their daily plant status monitoring activities and did not constitute any separate inspection samples.

b. Findings

No findings of significance were identified.

.3 Selected Issue Follow-up Inspection

a. Inspection Scope

On March 25, 2009, the inspectors completed a review of the licensee's corrective actions with regard to loose parts found in the secondary side of the steam generators. The inspectors reviewed documents and interviewed personnel to determine if the licensee completely and accurately identified problems in a timely manner commensurate with its significance, evaluated and dispositioned operability issues, considered the extent of condition, prioritized the problem commensurate with its safety significance, identified root and contributing causes of significant conditions adverse to quality, identified appropriate corrective actions, and completed corrective actions in a timely manner commensurate with the safety significance of the issue.

These activities constitute completion of one in-depth problem identification and resolution sample as defined in IP 71152-05.

b. Findings

Introduction. The inspectors identified a Green noncited violation of 10 CFR Part 50, Appendix B, Criterion V, for the failure to follow procedures that require initiating a Smart Form for damage to safety-related equipment. The licensee failed to initiate a Smart Form when multiple loose parts were discovered in the steam generators during a refueling outage that had damaged the tubes to varying degrees. As a result, the licensee did not identify sources of loose parts and potential corrective actions.

Description. The inspectors reviewed documents related to loose parts found in the secondary side of the Unit 2 steam generators during Refueling Outage 10 in April 2008. The inspectors discovered that the licensee documented damage to the steam generator tubes, but failed to document the damage in a Smart Form.

The licensee evaluated tube wear due to loose parts in order to justify safe operation until the next steam generator inspection period. This was documented in the Steam Generator Condition Monitoring and Operational Assessment for Comanche Peak Unit 2 April 2008 Outage, as required by their technical specifications. However, the inspectors observed that the licensee had not initiated a Smart Form to document the damage to safety-related equipment. While the Condition Monitoring and Operational Assessment report evaluates loose parts, it does not address the source of the parts or any corrective actions needed to prevent future loose parts from entering the steam generators. If the source of the loose parts found in the steam generators remained unidentified and continued to cause loose parts to be introduced into the steam generators, damage could occur to the tubes before the next inspection period. This includes parts potentially introduced by failed administrative controls or broken equipment in secondary plant systems. The inspectors observed that loose parts could be unrecognizable due to damage to the part; however, some parts were clearly identifiable.

The inspectors interviewed personnel responsible for the steam generator foreign object search and retrieval and the engineer responsible for the feedwater system and determined that the individuals had not communicated with each other regarding the parts found in the steam generators in order to find the source of the parts. Therefore, the inspectors concluded that the licensee had failed to attempt to identify sources of loose parts and potential corrective actions by not initiating a Smart Form.

The inspectors determined through a review of the licensee's basic cause evaluation that the failure to follow Procedure STA-421, "Initiation of Smart Forms," Revision 14, was due to an inadequate threshold for entering conditions in the Smart Form database. In addition, through a review of past steam generator activities the inspectors determined that an evaluation of all loose parts for potential corrective actions was not conducted for Comanche Peak Unit 2 in the fall of 2006. The licensee did not find loose parts in the Unit 1 steam generators during the recent refueling outage in the fall of 2008, the first inspection since replacing the steam generators.

Analysis. The licensee's failure to initiate a Smart Form for damage to the safety-related steam generator tubes was a performance deficiency and resulted in the failure to identify sources of loose parts and potential corrective actions. The finding was more than minor because if the licensee continues to fail to document damage to safety-related equipment in the Smart Form database, there is potential that this could lead to a more significant safety concern, in that, the cause of the damage will not be evaluated and corrected. NRC Manual Chapter 0609, Attachment 4, "Phase 1 - Initial Screening

and Characterization of Findings,” directs use of NRC Manual Chapter 0609, Appendix J, “Steam Generator Tube Integrity Findings Significance Determination Process,” for findings that affect steam generator tube integrity. Using NRC Inspection Manual Chapter 0609, Appendix J, this finding was determined to be of very low safety significance because none of the tested tubes failed the in situ pressure tests. This finding has a Problem Identification and Resolution crosscutting aspect associated with the corrective action program, in that the licensee did not implement a corrective action program with a low threshold for identifying issues [P.1(a)].

Enforcement. Title 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions. Procedure STA-421, “Initiation of Smart Forms,” Revision 14, Attachment 8.A, required, in part, that equipment malfunctions, damage, or degradation, other than anticipated wear be documented on a Smart Form. Contrary to the above, from September 4, 2008, to March 25, 2009, the licensee had not documented equipment damage to steam generator tubes on a Smart Form. Since the violation was of very low safety significance and was documented in the licensee’s corrective action program as Smart Form SMF-2009-001069-00, it is being treated as a noncited violation, consistent with Section VI.A.1 of the NRC Enforcement Policy: NRC 05000446/2009003-01, “Failure to Initiate Smart Form for Damage to Steam Generator Tubes Due to Loose Parts.”

#### **40A5 Other Activities**

##### Quarterly Resident Inspector Observations of Security Personnel and Activities

a. Inspection Scope

During the inspection period, the inspectors performed observations of security force personnel and activities to ensure that the activities were consistent with the licensee’s security procedures and regulatory requirements relating to nuclear plant security. These observations took place during both normal and off-normal plant working hours.

These quarterly resident inspector observations of security force personnel and activities did not constitute any additional inspection samples. Rather, they were considered an integral part of the inspectors’ normal plant status review and inspection activities.

b. Findings

No findings of significance were identified.

#### **40A6 Meetings**

##### Exit Meeting Summary

On April 9, 2009, the inspectors presented the results of the onsite inspection of the licensee’s emergency preparedness biennial exercise to Mr. D. Kross, Plant Manager, and other members of the licensee’s staff. The licensee acknowledged the issues presented. The inspectors confirmed that all proprietary, sensitive, or personal information examined during the inspection had been returned to the licensee.

On April 16, 2009, after review of the complete biennial requalification cycle examination results, the inspectors conducted a telephonic exit with Mr. C. Herring, Superintendent of Operations Requalification Training. The licensee acknowledged the results as presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

On July 2, 2009, the inspectors presented the resident inspection results to Mr. R. Flores, Senior Vice President and Chief Nuclear Officer, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors acknowledged review of proprietary material during the inspection. No proprietary information has been included in the report.

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee Personnel

R. Flores, Senior Vice President and Chief Nuclear Officer  
M. Lucas, Site Vice President  
D. Fuller, Manager, Emergency Preparedness  
D. Goodwin, Director, Operations  
C. Herring, Superintendent of Operations Requalification Training  
T. Hope, Manager, Nuclear Licensing  
D. Kross, Plant Manager  
F. Madden, Director, Oversight and Regulatory Affairs  
B. Mays, Director, Site Engineering  
M. Pearson, Director, Performance Improvement  
S. Smith, Director, Maintenance  
K. Tate, Manager, Security  
D. Walling, Manager, Training  
D. Wilder, Manager, Plant Support

#### NRC Personnel

J. Kramer, Senior Resident Inspector  
B. Tindell, Resident Inspector

### LIST OF ITEMS OPENED AND CLOSED

#### Opened and Closed

05000446/2009003-01	NCV	Failure to Initiate Smart Form for Damage to Steam Generator Tubes Due to Loose Parts
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LIST OF DOCUMENTS REVIEWED

**Section 1RO1: Adverse Weather Protection**

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
ALM-0140	Alarm Procedure X-ALB-14	9
ABN-601	Response to a 138/345 KV System Malfunction	10
Operations Guideline 41	"Hands - Off" and Grid Notification Guideline	May 19, 2009

**Section 1RO5: Fire Protection**

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
FPI-701	Fire Preplan Instruction Manual Service Water Intake Structure	3

**Section 1RO7: Heat Sink Performance**

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
STA-734	Service Water System Fouling Monitoring Program	3

**Section 1R11: Licensed Operator Requalification Program**

DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
TRA-204	Licensed Operator Requalification Training	
SAR 08SA0216	Update Core Model For U1C14	5/22/08
SAR 07SA0147	Update Core Model For U1C13	7/24/07
SAR 04SA0292	RELAP Incorporate the NNKM Core Model	9/30/04
SAR 07SA0209	2007 Annual Simulator Testing	10/8/07
SOMI-010	Simulator Testing Program	16

SMART FORMS

SMF-2008-03513-00

OTHER

SARs Related to T.0019 Simulator Load:

04SA0177	05SA0001	05SA0184	05SA0206
06SA0008	06SA0066	07SA0138	08SA0116
08SA0119	08SA0120	08SA0121	08SA0199
08SA0200	08SA0201	08SA0202	08SA0273
08SA0275			

SARs Related to Simulator Benchmark Testing:

02SA0518	06SA0009	06SA0246	06SA0251
06SA0345	07SA0038	07SA0268	

**Section 1R12: Maintenance Effectiveness**

SMART FORMS

SMF-2008-003483-00 SMF-2008-003194-00

**Section 1R15: Operability Evaluations**

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
STA-421	Initiation of SmartForms	14

**Section 1R18: Plant Modifications**

DESIGN CHANGE DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
DCN 13058	Design Change Notice, SWIS Insect Abatement	1
DM 99-023	Design Modification, SWIS Insect Abatement	0

SMART FORMS

SMF-2008-003740-00

**Section 1R19: Postmaintenance Testing**

WORK ORDERS

3660660

SMART FORMS

SMF-2009-001258-00      SMF-2009-001527-00

**Section 1R22: Surveillance Testing**

WORK ORDERS

3660660

SMART FORMS

SMF-2009-001258-00      SMF-2009-001527-00

**Section 1EP1: Exercise Evaluation**

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
EPP-109	Duties and Responsibilities of the Emergency Coordinator and Recovery Manager	12
EPP-116	Emergency Repair and Damage Control and Immediate Entries	6
EPP-201	Assessment of Emergency Action Levels, Emergency Classification, and Plan Activation	11
EPP-203	Notifications	15
EPP-204	Activation and Operation of the Technical Support Center	14
EPP-205	Activation and Operation of the Operations Support Center	11
EPP-206	Activation and Operations of the Emergency Operations Facility	14
EPP-304	Protective Action Recommendations	19
EPP-305	Emergency Exposure Guidelines and Personnel Dosimetry	12
EPP-306	Use of Thyroid Blocking Agents	10
EPP-309	Onsite/In-Plant Radiological Surveys and Offsite Radiological Monitoring	13
EPP-312	Core Damage Assessment	2
EPP-314	Evacuation and Accountability	8
SG-006	Resolving Player Comments	3

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
SG-015	Remedial Training	3
SG-019	Pre-Exercise and Post-Exercise Activities	14

DRILL AND EXERCISE SCENARIOS AND EVALUATION REPORTS

August 29, 2007	September 26, 2007	November 8, 2007
May 14, 2008	May 19, 2008	June 9, 2008
August 13, 2008	August 18, 2008	August 25, 2008
September 8, 2008	September 15, 2008	November 23, 2008
February 10, 2009		

SMART FORMS

SMF-2008-0219	SMF-2008-1701	SMF-2008-2647
SMF-2008-0220	SMF-2008-1706	SMF-2008-2823
SMF-2008-0267	SMF-2008-1708	SMF-2008-2847
SMF-2008-0373	SMF-2008-1710	SMF-2008-3669
SMF-2008-0913	SMF-2008-2628	SMF-2008-3793
SMF-2008-1051	SMF-2008-2629	SMF-2008-3825
SMF-2008-1052	SMF-2008-2637	SMF-2008-3850
SMF-2008-1448		

**Section 40A1: Performance Indicator Verification**

MISCELLANEOUS DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
SG-012	Alert and Notification System Surveillance	12, 13
SG-020	NRC Performance Indicators	12
	Comanche Peak Steam Electric Station Emergency Plan	36

**Section 40A2: Identification and Resolution of Problems**

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
NDE 7.15	Steam Generator Secondary Side Management	3
STA-733	Steam Generator Reliability Program	12

SMART FORMS

SMF-2009-001069-00	SMF-2009-001093-00
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