



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

August 10, 2010

John T. Conway
Senior Vice President and
Chief Nuclear Officer
Pacific Gas and Electric Company
77 Beale Street, B32
San Francisco, CA 94105

Subject: DIABLO CANYON POWER PLANT - NRC INTEGRATED INSPECTION
REPORT 05000275/2010003 AND 05000323/2010003

Dear Mr. Conway:

On June 26, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Diablo Canyon Power Plant. The enclosed integrated inspection report documents the inspection findings, which were discussed on June 28, 2010, with Mr. James Becker, Site Vice President and other members of your staff.

The inspections 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 two NRC-identified findings of very low safety significance (Green) and one Severity Level IV noncited violation. All of these findings were determined to involve violations of NRC requirements. Additionally, one licensee-identified violation, which was determined to be of very low safety significance, is listed in this report. However, because of the very low safety significance and because they are entered into your corrective action program, the NRC is treating these findings as noncited violations, consistent with Section VI.A.1 of the NRC Enforcement Policy. If you contest the violations or the significance of the noncited violations, 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 Diablo Canyon Power Plant. In addition, if you disagree with the crosscutting aspect assigned to 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 Diablo Canyon Power Plant.

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/ RWD for

Geoffrey B. Miller, Chief
Project Branch B
Division of Reactor Projects

Docket: 50-275
50-323
License: DPR-80
DPR-82

Enclosure:

NRC Inspection Report 05000/275/2010003 and 0500323/2010003
w/Attachment: Supplemental Information

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MABrown	MSPeck	MShannon	GWerner	TFarnholtz	
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C:DRS/EB2	C:DRS/TSB	C:DRS/OB	C:DRP/B		
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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 05000275, 05000323

License: DPR-80, DPR-82

Report: 05000275/2010003
05000323/2010003

Licensee: Pacific Gas and Electric Company

Facility: Diablo Canyon Power Plant, Units 1 and 2

Location: 7 ½ miles NW of Avila Beach
Avila Beach, California

Dates: March 28 through June 26, 2010

Inspectors: M. Peck, Senior Resident Inspector
M. Brown, Resident Inspector
A. Erickson, Nuclear Safety Professional Development
Program Participant
L. Ricketson, P.E., Senior Health Physicist
C. Graves, Health Physicist
D. Stearns, Health Physicist

Approved By: G. B Miller, Chief, Project Branch B
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000275/2010003, 05000323/2010003; 3/28/2010 – 6/26/2010; Diablo Canyon Power Plant, Integrated Resident and Regional Report; Identification and Resolution of Problems and Event Followup.

The report covered a 3-month period of inspection by resident inspectors and an announced baseline inspection by region-based inspectors. Two Green noncited violations of significance and one Severity Level IV noncited violation were identified. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609, "Significance Determination Process." Crosscutting aspects are determined using Inspection Manual Chapter 0310, "Components Within the Cross-Cutting Areas." 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: Mitigating Systems

- Green. The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criteria XVI, "Corrective Action," after Pacific Gas and Electric failed to implement prompt corrective actions after identifying a nonconservative technical specification. In December 2008, the inspectors identified that the diesel generator loading calculations were inadequate to demonstrate that the design basis were met. On January 9, 2009, the licensee entered this condition into the corrective action program. On April 9, 2009, Pacific Gas and Electric concluded that Technical Specification Surveillance Requirement 3.8.1, "AC Sources – Operating," was not adequate to preserve plant safety and applied the provisions of Technical Specification Surveillance Requirement 3.0.3, and Administrative Letter 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety." The licensee did not complete the necessary actions to correct the deficient technical specification by submitting an adequate license amendment request. The inspectors concluded the most significant contributor to the finding was a less than adequate engineering evaluation to support the new emergency diesel generator loading profiles following the previous violation. The licensee entered the performance deficiency into the corrective action program as Notification 50232181.

The inspectors determined that the performance deficiency is more than minor because if left uncorrected, the failure to implement prompt corrective actions has the potential to lead to a more significant safety concern. The inspectors concluded the finding was of very low safety significance because the finding was a design deficiency confirmed not to result in the loss of operability or functionality. The finding is associated with the Mitigating Systems Cornerstone. This finding had a crosscutting aspect in the area of problem identification and resolution, associated with the corrective action program component because the licensee failed to perform an adequate evaluation of the nonconservative

technical specification such that the resolutions address causes and extent of conditions, as necessary [P.1(c)] (Section 4OA2).

- Severity Level IV. The inspectors identified a noncited violation of 10 CFR 50.73(a)(2)(i)(B) and 10 CFR 50.73(a)(2)(v)(B) and after Pacific Gas and Electric failed to submit a required licensee event report within 60 days following discovery of a condition prohibited by the plant technical specifications and a condition that could have prevented the fulfillment of a safety function. On March 9, 2010, Pacific Gas and Electric identified that the degraded voltage protection scheme, required by Technical Specification 3.3.5, "Loss of Power Diesel Generator Start Instrumentation," was inadequate to protect operating engineering safety feature pump motors. The licensee concluded that sustained degraded voltage could result in an overcurrent condition affecting equipment powered from the preferred offsite power supply. This condition was required to be reported to the NRC because the degraded voltage protection scheme rendered engineered safety feature pumps inoperable for a period in excess of the allowable technical specification out of service time and the condition resulted in the loss of the degraded voltage protection scheme safety function on all three vital 4 kV power buses.

The inspectors evaluated this finding using the traditional enforcement process because the failure to submit a required event report affected the NRC's ability to perform its regulatory function. The inspectors concluded the violation was a Severity Level IV because the licensee failed to submit an adequate licensee event report. The inspectors determined that the violation was also a finding under the reactor oversight process because licensee personnel failed to adequately evaluate a condition adverse to quality for operability and reportability, as required by station procedures. The inspectors concluded that the finding is more than minor because the failure to properly evaluate degraded plant equipment for past operability and reportability could reasonably be seen to lead to a more significant condition. The inspectors concluded that the finding had very low safety significance because the failure to adequately evaluate the condition did not result in an actual loss of a system safety function or equipment required by technical specifications, or involve the loss or degradation of equipment specifically designed to mitigate a seismic, flooding, or severe weather initiating event, and did not involve the total loss of any safety function that contributes to an external event initiated core damage accident sequence. This finding has a crosscutting aspect in the area of problem identification and resolution, associated with the corrective action program component because the licensee failed to perform an adequate evaluation of the degraded voltage protection scheme such that the resolutions address causes and extent of conditions, as necessary [P.1(c)] (Section 4OA3).

Cornerstone: Barrier Integrity

- Green. The inspectors identified a noncited violation of Technical Specification 5.5.16.a.1, "Containment Leakage Rate Testing Program," after Pacific Gas and Electric failed to perform containment concrete inspections in accordance with the requirements of and frequency specified by ASME Section XI code, Subsection IWL. The licensee entered this into their corrective action program as Notification 50310054.

The inspectors concluded that the failure of Pacific Gas and Electric to perform the technical specification required inspections is a performance deficiency. The finding is more than minor because the performance deficiency is associated with the Barrier Integrity Cornerstone human performance attribute and adversely affected the cornerstone objective to provide reasonable assurance that containment physical design barrier protects the public from radionuclide releases caused by accidents or events. The inspectors concluded that the finding is of very low safety significance because the performance deficiency did not represent a degradation of the radiological barrier function provided for the control room, auxiliary building, or spent fuel pool, did not represent a degradation of the barrier function of the control room against smoke or toxic atmosphere, did not represent an actual open pathway in the physical integrity of reactor containment, and did not involve an actual reduction in function of hydrogen igniters in the reactor containment. The inspectors did not assign a crosscutting aspect to this finding because the performance deficiency did not occur within the past three years and is not reflective of present performance (Section 4OA2).

B. Licensee-Identified Violations

A violation of very low safety significance, which was identified by the licensee, has been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. This violation and corrective action tracking numbers are listed in Section 4OA7.

REPORT DETAILS

Summary of Plant Status

Pacific Gas and Electric operated both Diablo Canyon units at full power for the duration of the inspection period.

1. REACTOR SAFETY

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

1R01 Adverse Weather Protection (71111.01)

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 the 230 kV off-site power system, 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 affecting these areas and the communications protocols between the transmission system operator and the plant to verify that the appropriate information was being exchanged when issues arose that could affect the offsite power system. Examples of aspects considered in the inspectors' review included:

- The coordination between the transmission system operator and the plant during off-normal or emergency events
- The explanations for the events
- The estimates of when the offsite power system would be returned to a normal state
- The notifications from the transmission system operator to the plant when the offsite power system was returned to normal

During the inspection, the inspectors focused on plant-specific design features and the licensee's procedures used to mitigate or respond to adverse weather conditions. Additionally, the inspectors reviewed the Final Safety Analysis Report Update and performance requirements for systems selected for inspection, and verified that operator actions were appropriate as specified by plant-specific procedures. The inspectors also reviewed corrective action program items to verify that the licensee was identifying adverse weather issues at an appropriate threshold and entering them into the corrective action program in accordance with station corrective action procedures. 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 were identified.

1R04 Equipment Alignments (71111.04)

.1 Partial Equipment Walkdowns

a. Inspection Scope

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

- Unit 2, high pressure safety injection system, May 5, 2010
- Unit 1, containment spray system, May 25, 2010

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 Update, technical specification requirements, administrative technical specifications, outstanding work orders, condition reports, 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. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two partial system walkdown samples as defined by Inspection Procedure 71111.04-05.

b. Findings

No findings were identified.

.2 Complete Walkdown

a. Inspection Scope

On June 9, 2010, the inspectors performed a complete system alignment inspection of the Unit 1 auxiliary feedwater system to verify the functional capability of the system. The inspectors selected this system because it was considered both safety-significant and risk-significant in the licensee's probabilistic risk assessment. The inspectors walked down the system to review mechanical and electrical equipment line ups, electrical power availability, system pressure and temperature indications, as appropriate, component labeling, component lubrication, component and equipment cooling, hangers and supports, operability of support systems, and to ensure that ancillary equipment or debris did not interfere with equipment operation. The inspectors reviewed a sample of past and outstanding work orders to determine whether any

deficiencies significantly affected the system function. In addition, the inspectors reviewed the corrective action program database to ensure that system equipment-alignment problems were being identified and appropriately resolved. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one complete system walkdown sample as defined by Inspection Procedure 71111.04-05.

b. Findings

No findings were identified.

1R05 Fire Protection (71111.05)

Quarterly Fire Inspection Tours

a. Inspection Scope

The inspectors conducted fire protection walkdowns that were focused on availability, accessibility, and the condition of firefighting equipment in the following risk-significant plant areas:

- Fire Area 10, Unit 1, 12 kV switchgear room, May 3, 2010
- Fire Area 20, Unit 2, 12 kV switchgear room, May 4, 2010
- Fire Areas 13-A, 13-B, 13-C, 24-A, 24 B, and 24-C, Unit 1 and Unit 2, 4 kV switchgear rooms, May 6, 2010
- Fire Area 6-A-1, Unit 1, battery, inverter, and dc switchgear room, June 22, 2010

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. 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. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's corrective action program. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four quarterly fire protection inspection samples as defined by Inspection Procedure 71111.05-05.

b. Findings

No findings were identified.

1R11 Licensed Operator Requalification Program (71111.11)

a. Inspection Scope

On May 18, 2010, 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 identify and implement appropriate technical specification actions and 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. Specific documents reviewed during this inspection are listed in the attachment.

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

b. Findings

No findings were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

The inspectors evaluated degraded performance issues involving the following risk significant systems:

- Units 1 and 2, plant vent monitoring systems, May 17, 2010
- Unit 2, containment hydrogen monitoring system, June 10, 2010

The inspectors reviewed events such as where ineffective equipment maintenance has resulted in valid or invalid automatic actuations of engineered safeguards systems and independently verified the licensee's actions to address system performance or condition problems in terms of the following:

- Implementing appropriate work practices
- Identifying and addressing common cause failures
- Scoping of systems in accordance with 10 CFR 50.65(b)
- Characterizing system reliability issues for performance
- Charging unavailability for performance
- Trending key parameters for condition monitoring
- Ensuring proper classification in accordance with 10 CFR 50.65(a)(1) or (a)(2)
- Verifying appropriate performance criteria for structures, systems, and components classified as having an adequate demonstration of performance through preventive maintenance, as described in 10 CFR 50.65(a)(2), or as requiring the establishment of appropriate and adequate goals and corrective actions for systems classified as not having adequate performance, as described in 10 CFR 50.65(a)(1)

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the system. In addition, the inspectors verified maintenance effectiveness issues were entered into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two quarterly maintenance effectiveness samples as defined in Inspection Procedure 71111.12-05.

b. Findings

No findings 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:

- Technical Specification Tracking Sheet 2-TS-10-0269, Emergency diesel generator 2-3 inoperable due to roll-up door failures, April 15, 2010

- Technical Specification Tracking Sheets 1-TS-10-0243 and 2-TS-10-0270, One offsite power source inoperable, April 16, 2010
- Calculation PRA10-04, Evaluation of the PRA Impact of Missed Surveillances Due to a Missed Surveillance of the Containment Concrete per ASME Section IX Requirements, April 19, 2010
- Calculation PRA10-02, Risk Management Actions Following Less than Adequate Diesel Generator Surveillance Test, May 19, 2010

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

These activities constitute completion of four maintenance risk assessments and emergent work control inspection samples as defined by Inspection Procedure 71111.13-05.

b. Findings

No findings were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following issues:

- Unit 2, Emergency diesel generator 2-3 failed roll-up door, April 15, 2010
- 230 kV offsite power system insulator cotter pin failure, April 19, 2010
- Unit 1, Component cooling water pump 1-3 black residue, April 30, 2010
- Units 1 and 2, Auxiliary saltwater system valve degraded coatings, May 18, 2010
- Unit 1, Component cooling water pump 1-1 oil leaks, May 19, 2010
- Unit 2, Seismic sensor connector degraded, May 25, 2010

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 Safety Analysis Report Update 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. Where appropriate the inspectors determined compliance with bounding limitations associated with the evaluations. Additionally, the inspectors also 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 constitute completion of six operability evaluations inspection samples as defined in Inspection Procedure 71111.15-05

b. Findings

No findings 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:

- Unit 2, Auxiliary saltwater pump 2-1, following preventive maintenance, April 5, 2010
- Unit 2, Steam generator 2 atmospheric dump valve 2-1 refurbishment, May 13, 2010
- Unit 2, Seismic trip system sensor repairs, May 25, 2010

The inspectors selected these activities based upon the structure, system, or component's ability to affect risk. The inspectors evaluated these activities for the following:

- The effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed
- Acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate

The inspectors evaluated the activities against the technical specifications, the Final Safety Analysis Report Update, 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 in 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 constitute completion of three postmaintenance testing inspection samples as defined in Inspection Procedure 71111.19-05.

b. Findings

No findings were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the Final Safety Analysis Report Update, procedure requirements, and technical specifications to ensure that the six 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
- Engineering evaluations, root causes, and bases for returning tested systems, structures, and components not meeting the test acceptance criteria were correct
- Reference setting data
- Annunciators and alarms setpoints

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

- April 12, 2010, Unit 2, Inservice surveillance test of motor-driven auxiliary feedwater pump 2-3
- April 13, 2010, Unit 1, Inservice surveillance of auxiliary level control valves LCV-115 and LCV-113
- April 23, 2010, Unit 1, Routine surveillance of auxiliary building safeguards air filtration system
- April 26, 2010, Unit 1, Reactor coolant system leak rate surveillance test
- May 25, 2010, Unit 1, Routine surveillance of diesel generator 1-1
- June 7, 2010, Unit 1, Routine surveillance of diesel generator 1-3 engine analysis

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

These activities constitute completion of six surveillance testing inspection samples as defined in Inspection Procedure 71111.22-05.

b. Findings

No findings were identified.

2. RADIATION SAFETY

Cornerstone: Occupational and Public Radiation Safety

2RS06 Radioactive Gaseous and Liquid Effluent Treatment (71124.06)

a. Inspection Scope

This area was inspected to: (1) ensure the gaseous and liquid effluent processing systems are maintained so radiological discharges are properly mitigated, monitored, and evaluated with respect to public exposure; (2) ensure abnormal radioactive gaseous or liquid discharges and conditions, when effluent radiation monitors are out-of-service, are controlled in accordance with the applicable regulatory requirements and licensee procedures; (3) verify the licensee's quality control program ensures the radioactive effluent sampling and analysis requirements are satisfied so discharges of radioactive materials are adequately quantified and evaluated; and (4) verify the adequacy of public dose projections resulting from radioactive effluent discharges. The inspectors used the requirements in 10 CFR Part 20; 10 CFR Part 50, Appendices A and I; 40 CFR Part 190; the offsite dose calculation manual, and licensee procedures required by the technical specifications as criteria for determining compliance. The inspectors interviewed licensee personnel and reviewed and/or observed the following items:

- Radiological effluent release reports since the previous inspection and reports related to the effluent program issued since the previous inspection, if any

- Effluent program implementing procedures, including sampling, monitor setpoint determinations and dose calculations
- Equipment configuration and flow paths of selected gaseous and liquid discharge system components, filtered ventilation system material condition, and significant changes to their effluent release points, if any, and associated 10 CFR 50.59 reviews
- Selected portions of the routine processing and discharge of radioactive gaseous and liquid effluents (including sample collection and analysis)
- Controls used to ensure representative sampling and appropriate compensatory sampling
- Results of the inter-laboratory comparison program
- Effluent stack flow rates
- Surveillance test results of technical specification-required ventilation effluent discharge systems since the previous inspection
- Significant changes in reported dose values, if any
- A selection of radioactive liquid and gaseous waste discharge permits
- Part 61 analyses and methods used to determine which isotopes are included in the source term
- Offsite dose calculation manual changes, if any
- Meteorological dispersion and deposition factors
- Latest land use census
- Records of abnormal gaseous or liquid tank discharges, if any
- Groundwater monitoring results
- Changes to the licensee's written program for identifying and controlling contaminated spills/leaks to groundwater, if any
- Identified leakage or spill events and entries made into 10 CFR 50.75 (g) records, if any, and associated evaluations of the extent of the contamination and the radiological source term
- Offsite notifications, and reports of events associated with spills, leaks, or groundwater monitoring results, if any
- Audits, self-assessments, reports, and corrective action documents related to radioactive gaseous and liquid effluent treatment since the last inspection

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

These activities constitute completion of the one required sample, as defined in Inspection Procedure 71124.06-05.

b. Findings

No findings were identified.

2RS07 Radiological Environmental Monitoring Program (71124.07)

a. Inspection Scope

This area was inspected to: (1) ensure that the radiological environmental monitoring program verifies the impact of radioactive effluent releases to the environment and sufficiently validates the integrity of the radioactive gaseous and liquid effluent release program; (2) verify that the radiological environmental monitoring program is implemented consistent with the licensee's technical specifications and/or offsite dose calculation manual, and to validate that the radioactive effluent release program meets the design objective contained in Appendix I to 10 CFR Part 50; and (3) ensure that the radiological environmental monitoring program monitors non-effluent exposure pathways, is based on sound principles and assumptions, and validates that doses to members of the public are within the dose limits of 10CFR Part 20 and 40 CFR Part 190 as applicable. The inspectors reviewed and/or observed the following items:

- Annual environmental monitoring reports and offsite dose calculation manual
- Selected air sampling and thermoluminescent dosimeter monitoring stations
- Collection and preparation of environmental samples
- Operability, calibration, and maintenance of meteorological instruments
- Selected events documented in the annual environmental monitoring report which involved a missed sample, inoperable sampler, lost thermoluminescent dosimeter, or anomalous measurement
- Selected structures, systems, or components that may contain licensed material and has a credible mechanism for licensed material to reach ground water
- Records required by 10 CFR 50.75(g)
- Significant changes made by the licensee to the offsite dose calculation manual as the result of changes to the land census or sampler station modifications since the last inspection
- Calibration and maintenance records for selected air samplers, composite water samplers, and environmental sample radiation measurement instrumentation
- Inter-laboratory comparison program results

- Audits, self-assessments, reports, and corrective action documents related to the radiological environmental monitoring program since the last inspection

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

These activities constitute completion of the one required sample as defined in Inspection Procedure 71124.07-05.

b. Findings

No findings were identified.

2RS08 Radioactive Solid Waste Processing, and Radioactive Material Handling, Storage, and Transportation (71124.08)

a. Inspection Scope

This area was inspected to verify the effectiveness of the licensee's programs for processing, handling, storage, and transportation of radioactive material. The inspectors used the requirements of 10 CFR Parts 20, 61, and 71 and Department of Transportation regulations contained in 49 CFR Parts 171-180 for determining compliance. The inspectors interviewed licensee personnel and reviewed the following items:

- The solid radioactive waste system description, process control program, and the scope of the licensee's audit program
- Control of radioactive waste storage areas including container labeling/marketing and monitoring containers for deformation or signs of waste decomposition
- Changes to the liquid and solid waste processing system configuration including a review of waste processing equipment that is not operational or abandoned in place
- Radio-chemical sample analysis results for radioactive waste streams and use of scaling factors and calculations to account for difficult-to-measure radionuclides
- Processes for waste classification including use of scaling factors and 10 CFR Part 61 analysis
- Shipment packaging, surveying, labeling, marking, placarding, vehicle checking, driver instructing, and preparation of the disposal manifest
- Audits, self-assessments, reports, and corrective action reports radioactive solid waste processing, and radioactive material handling, storage, and transportation performed since the last inspection

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

These activities constitute completion of the one required sample as defined in Inspection Procedure 71124.08-05.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

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 1st quarter 2010 performance indicators for any obvious inconsistencies prior to its public release in accordance with 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 were identified.

.2 Safety System Functional Failures (MS05)

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 first quarter 2009 through the first quarter 2010. To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, and NUREG-1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73." 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 March 31, 2009 through March 31, 2010, 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 failure samples as defined in Inspection Procedure 71151-05.

b. Findings

No findings were identified.

.3 Mitigating Systems Performance Index - Emergency ac Power System (MS06)

a. Inspection Scope

The inspectors sampled licensee submittals for the mitigating systems performance index - emergency ac power system performance indicator for Units 1 and 2 for the period from the first quarter 2009 through the first quarter 2010. To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5. The inspectors reviewed the licensee's operator narrative logs, mitigating systems performance index derivation reports, issue reports, event reports, and NRC integrated inspection reports for the period of March 31, 2009 through March 31, 2010, to validate the accuracy of the submittals. The inspectors reviewed the mitigating systems performance index component risk coefficient to determine if it had changed by more than 25 percent in value since the previous inspection; and if so, that the change was in accordance with applicable NEI guidance. 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 mitigating systems performance index emergency ac power system samples as defined in Inspection Procedure 71151-05.

b. Findings

No findings were identified.

.4 Mitigating Systems Performance Index - High Pressure Injection Systems (MS07)

a. Inspection Scope

The inspectors sampled licensee submittals for the mitigating systems performance index - high pressure injection systems performance indicator for Units 1 and 2 for the period from the first quarter 2009 through the first quarter 2010. To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5. The inspectors reviewed the licensee's operator narrative logs, issue reports, mitigating systems performance index derivation reports, event reports, and NRC integrated inspection reports for the period of March 31, 2009 through March 31, 2010, to validate the accuracy of the submittals. The inspectors reviewed the mitigating systems performance index component risk coefficient to determine if it had changed by more than 25 percent in value since the previous inspection; and if so, that the change was in accordance with applicable NEI guidance. 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 mitigating systems performance index high pressure injection system samples as defined in Inspection Procedure 71151-05.

b. Findings

No findings 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 actions. 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 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, as such, did not constitute any separate inspection samples.

b. Findings

No findings were identified.

.3 Selected Issue Follow-up Inspection

a. Inspection Scope

During a review of items entered in the licensee's corrective action program, the inspectors recognized corrective action items documenting spent fuel storage project human performance errors and missed Unit 1 containment concrete inspections.

These activities constitute completion of two in-depth problem identification and resolution samples as defined in Inspection Procedure 71152-05.

b. Findings

Introduction. The inspectors identified a Green noncited violation of Technical Specification 5.5.16.a.1, "Containment Leakage Rate Testing Program," after Pacific Gas and Electric failed to perform containment concrete inspections in accordance with the requirements of and frequency specified by ASME Section XI code, Subsection IWL.

Description. On April 14, 2010, during a license renewal audit, NRC auditors identified that Pacific Gas and Electric had not completed visual examinations of Unit 1 containment concrete surfaces. Pacific Gas and Electric had initially performed the examinations of Units 1 and 2 containments in 2000 and 2001 respectively. ASME Section XI, Subsection IWL, required that subsequent inspections be performed every 5 years. However, the licensee did not perform the Unit 1 examinations in 2005. Pacific Gas and Electric concluded that a misinterpretation of the ASME Code led to the inadequate conclusion that examinations are only required every 10 years for a multiple unit site. Pacific Gas and Electric had scheduled to perform the Unit 1 examinations during the refueling outage in October 2010, but rescheduled the activity in order to perform the examinations during the current operating cycle.

Analysis. The inspectors concluded that the failure of Pacific Gas and Electric to comply with the requirements of Technical Specification 5.5.16.a.1 was a performance deficiency. The finding is more than minor because the failure to perform the containment concrete inspections is associated with the Barrier Integrity Cornerstone human performance attribute and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. Using Inspection Manual Chapter 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," the inspectors concluded that the finding had very low safety significance because it did not represent a degradation of the radiological barrier function provided for the control room, auxiliary building, or spent fuel pool, did not represent a degradation of the barrier function of the control room against smoke or toxic atmosphere, did not represent an actual open pathway in the physical integrity of reactor containment, and did not involve an actual reduction in function of hydrogen igniters in the reactor containment. The inspectors did not assign a crosscutting aspect to this finding because the performance deficiency did not occur within the past three years and is not reflective of present performance.

Enforcement. Technical Specification 5.5.16.a.1 requires, in part, that the visual examination of containment concrete surfaces will be performed in accordance with the requirements of a frequency specified by ASME Section XI Code, Subsection IWL which requires, in part, that concrete shall be examined at 1, 3, and 5 years following the

completion of the containment structural integrity test and every 5 years thereafter. Contrary to the above, Pacific Gas and Electric failed to perform the visual examination of Unit 1 containment concrete surfaces in 2005, 5 years after the previous examinations had been completed. Pacific Gas and Electric initiated corrective actions to perform the required containment concrete inspections during the current operating cycle. Because this finding is of very low safety significance and was entered into the corrective action program as Notification 50310054, this violation is being treated as a noncited violation in accordance with Section VI.A.1 of the Enforcement Policy:
NCV 05000275/2010003-01, "Failure to Perform Unit 1 Containment Concrete Inspections."

.4 Inadequate Corrective Actions Following Identification of a Nonconservative Technical Specification

Introduction. The inspectors identified a Green noncited violation of 10 CFR Part 50, Appendix B, Criteria XVI, "Corrective Actions," after Pacific Gas and Electric failed to promptly correct a nonconservative technical specification.

Description. The inspectors identified that Pacific Gas and Electric failed to implement prompt corrective actions following identification of a nonconservative technical specification. In December 2008, the inspectors identified that the diesel generator loading calculations were inadequate to demonstrate that the system design basis was met. The inspectors disposition this issue as noncited violation 05000275/2008005-04; 05000323/2008005-04, "Inadequate Design Control for the Emergency Diesel Generator." On January 9, 2009, the licensee entered this condition into the corrective action program as Notifications 50163396 and 5017902. On March 9, 2009, the licensee concluded that Technical Specification Surveillance Requirements 3.8.1, "AC Sources – Operating," was nonconservative (Notification 50207912). On April 9, 2009, Pacific Gas and Electric concluded that Technical Specification Surveillance Requirement 3.8.1 was not adequate to preserve safety and applied the provisions of Technical Specification Surveillance Requirement 3.0.3, and Administrative Letter 98-10, "Dispositioning of Technical Specification that are Insufficient to Assure Plant Safety." Administrative Letter 98-10 specified that licensees are required to take prompt action to submit a license amendment, with appropriate justification and schedule, to correct the nonconservative technical specification. However, the licensee did not complete action to correct the nonconservative technical specification. The inspectors concluded the most significant contributor to the finding was less than adequate diesel generator loading evaluations to support a license amendment request.

Analysis. The licensee's failure to promptly correct the nonconservative technical specification was a performance deficiency. The inspectors determined the performance deficiency is more than minor because if left uncorrected, the failure to implement prompt corrective actions has the potential to lead to a more significant safety concern. The finding is associated with the Mitigating Systems Cornerstone. The inspectors used Inspection Manual Chapter 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," to analyze the significance of this finding. The inspectors concluded the finding was of very low safety significance because the finding was a design deficiency confirmed not to result in the loss of operability or functionality. This finding had a crosscutting aspect in the area of problem identification and resolution, associated with the corrective action program component because the licensee failed to perform an

adequate evaluation leading to correction of the nonconservative technical specification [P.1(c)].

Enforcement. Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criteria XVI, "Corrective Action," required that Pacific Gas and Electric establish measures to assure nonconformances are promptly identified and corrected. Contrary to the above, Pacific Gas and Electric failed to promptly correct the nonconforming condition related to nonconservative Technical Specification 3.8.1. Because the finding is of very low safety significance and was entered into the corrective action program as Notification 50232181, this violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy: NCV 05000275; 323/2010003-02, "Inadequate Corrective Actions Following Identification of a Nonconservative Technical Specification."

.5 Semi-Annual Trend Review

a. Inspection Scope

The inspectors performed a review of the licensee's corrective action program and associated documents to identify trends that could indicate the existence of a more significant safety issue. The inspectors focused their review on repetitive equipment issues, but also considered the results of daily corrective action item screening discussed in Section 4OA2.2 above, licensee trending efforts, and licensee human performance results. The inspectors nominally considered the 6-month period of January 1, 2010, through June 30, 2010, although some examples expanded beyond those dates where the scope of the trend warranted. The inspectors also included issues documented outside the normal corrective action program in major equipment problem lists, repetitive and/or rework maintenance lists, departmental problem/challenge lists, system health reports, quality assurance audit/surveillance reports, self-assessment reports, and maintenance rule assessments. The inspectors compared and contrasted their results with the results contained in the licensee's corrective action program trending reports. Corrective actions associated with a sample of the issues identified in the licensee's trending reports were reviewed for adequacy. Specific documents reviewed are listed in the attachment.

These activities constitute a single semi-annual trend inspection sample.

b. Findings and Observations

Continuation of an Adverse Trend in Problem Evaluation

The inspectors concluded that the adverse trend associated with the thoroughness of Pacific Gas and Electric's problem evaluation continued through June 2010. The inspectors originally identified this adverse trend in September 2008 (as described in Section 4OA2 of Inspection Reports 05000275/2008005 and 05000275/2009005). Current examples of this adverse trend included:

- March 2010, a less than adequate evaluation following the inoperability of an emergency core cooling sump valve. The licensee's evaluation failed to identify that design and configuration control requirements were not met. This issue was dispositioned as NCV 05000323/2009009-01.

- March 2010, the failure to adequately evaluate new manual operator actions used in plant emergency procedures. While this issue represented an old performance deficiency, the licensee had an opportunity to identify the problem during the followup to the degraded emergency core cooling sump valve. This issue was dispositioned as NCV 05000323/2009009-03.
- April 2010, the failure of plant personnel to adequately evaluate the extent of condition associated with a previous (June 2009) finding to update the Final Safety Analysis Report Update with the current plant design bases. This issue was dispositioned as NCV 05000275, 05000323/2010002-02.
- April 2010, less than adequate evaluation following a failure of both motor-driven auxiliary feedwater trains. This issue was dispositioned as NCV 05000275, 05000323/2010002-04.
- April 2010, the failure to perform an adequate review to determine reportability requirements following a common cause inoperability of independent trains or channels. This issue was dispositioned as NCV 05000275, 05000323/2010002-05.
- A less than adequate evaluation resulted in inadequate actions to correct a nonconservative technical specification as described in Section 4OA2 in this report.
- A less than adequate evaluation resulted in the failure to report a safety system functional failure as described in Section 4OA3 in this report.
- March 2010, the licensee failed to adequately evaluate changes to diesel generator testing as described in the Final Safety Analysis Report Update. This issue was dispositioned as NCV 05000323/2010007-02.
- March 2010, the licensee performed a less than adequate extent of condition review from a previous violation that resulted in the failure to update the Final Safety Analysis Report Update with the current plant design bases. This issue was dispositioned as NCV 05000275, and 05000323/2010007-04.
- March 2010, a less than adequate operability determination associated with the offsite degraded voltage protection scheme. This issue was dispositioned as NCV 05000232/2010007-05.
- March 2010, a less than adequate evaluation of piping system changes resulted in inadequate drawings and procedures to align emergency makeup water supply from Diablo Canyon Creek to support the auxiliary feedwater system. This issue was dispositioned as NCV 05000323/2010007-08.

In April 2009, Pacific Gas and Electric completed a root cause analysis of this adverse trend and implemented corrective actions. The inspectors concluded these corrective actions were not effective to address the trend. In May 2010, Pacific Gas and Electric completed a second root cause of this adverse trend (Notification Order 60024480,

Adverse Trend in Thoroughness of Problem Evaluation). The second evaluation concluded that the leadership team has not provided adequate standards, nor effectively demonstrated or reinforced behaviors, or established sustainable programs in the area of evaluation. The root cause team recommended the following corrective actions:

- Provide expectations to the senior leadership team on coaching to standards and responsibility for implementing an effective evaluation program
- Establish generic governance for evaluation programs
- Train program sponsors and program owners on the structure of an effective program governance
- Execute a program implementation matrix to ensure evaluation programs incorporate the essential elements for their sustainability

The inspectors will continue to monitor the licensee's progress to address this adverse trend.

Continuation of an Adverse Trend in Meeting Regulatory Administrative Functions

The inspectors concluded that the adverse trend of Pacific Gas and Electric's failure to meet all administrative license requirements continued through June 2010. The inspectors originally identified this adverse trend in June 2009 (as described in Section 4OA2 of Inspection Report 05000275/2009003 and 05000323/2009003). This adverse trend was manifested by six traditional enforcement violations in 2009 and five additional traditional enforcement violations since the beginning of 2010.

In October 2009, the licensee completed a common cause evaluation that focused on the five traditional enforcement violations issued during the preceding twelve months. The licensee concluded that inadequate application of the 50.59 change control process was the dominant cause of the trend. The licensee's corrective actions included establishment of a 10 CFR 50.59 evaluation quality review board and enhanced 10 CFR 50.59 training. In June 2010, the licensee concluded that this common cause evaluation and corrective actions were not effective to mitigate the trend. The licensee subsequently concluded that the magnitude of the 50.59 program issues effectively masked the underlying deficiencies in the licensing and design bases documentation. Pacific Gas and Electric has implemented a license basis verification project to address these underlying problems.

Continuation of an Adverse Trend in Capacity and Capability of ac Power Systems

The inspectors concluded that the adverse trend related with maintaining capacity and capability design margin for vital ac power systems continued through June 2010. The inspectors originally identified this trend in September 2008 (as described in Section 4OA2 of Inspection Reports 05000275/2008005). Current examples of the adverse trend include:

- March 2010, the NRC identified that second level undervoltage relay time delay to initiate load shed and sequencing upon the diesel generator was inadequate.

This relay was not capable of performing the required design function to shed the offsite power source prior to damage to safety related equipment. This issue was dispositioned as NCV 05000323/2010007-06, "Second Level Undervoltage Relay Time Delay to Initiate Load Shed and Sequencing Upon the Diesel Generator is Adequate to Assure Plant Safety."

- March 2010, the NRC identified that the licensee used nonconservative power assumptions in motor-operated valve design calculations. This issue was dispositioned as NCV 05000275/2010007-07, "Nonconservative Inputs into Motor-Operated Valve Calculation."
- May 2010, the NRC identified that the licensee failed to ensure that the undervoltage relay time design basis was in the Final Safety Analysis Report Update. This issue was dispositioned as NCV 05000275, and 05000323/2010007-04, "Failure to Update the Final Safety Analysis Report Update with the Current Plant Design Bases."
- February 2010, the NRC identified that the emergency diesel generator loading did not conform to the design basis requirements (Notification 50306053) inadequate design control for the emergency diesel generator (Section 4OA5.3) NCV 05000275; 05000323/2008005-04.
- The emergency diesel generator technical specification surveillance requirement was not adequate to preserve safety, as described in Section 4OA2 of this report.
- The NRC identified that a portion of the emergency diesel generator air start system did not meet seismic qualifications (Notification 50307504).
- The licensee's support calculation to support acceptability of a 30 minute time duration to power safety related buses from the 500 kV offsite power system was less than adequate (NCV 05000275;323/2009003-05, Inadequate Corrective Actions Following the Loss of Design Control for the 500 kV Offsite Power Source). The licensee submitted the calculation to NRC for approval December 29, 2009. The NRC is currently reviewing the license amendment request.
- The inspectors have ongoing concerns with the capacity and capability of the 230 kV preferred off site power system as described in Unresolved Item 05000275;323/2009003-01, Corrective Action Following Degraded Offsite Power System. Resolution of this issue is pending additional review of the licensee's offsite power grid stability analysis.

4OA3 Event Followup (71153)

.1 (Closed) Licensee Event Report 05000275/2010-002-00: Potential Loss of Safety-Related Pumps due to Degraded Voltage During Postulated Accidents

a. Scope

On March 9, 2010, Pacific Gas and Electric engineers identified that degraded voltage setpoints, specified by Technical Specification 3.3.5, "Loss of Power (LOP) Diesel

Generator (DG) Start Instrumentation,” were inadequate to ensure plant safety. Plant engineers determined that operating engineering safety feature pump motors were not adequately protected from overcurrent conditions by the degraded voltage protection scheme. On March 12, 2010, the licensee implemented administrative controls to restore safety function by raising the first level degraded voltage setpoints. The inspectors concluded that the condition resulted in a violation because the degraded voltage protection scheme and operating engineering safety feature pumps were inoperable for a period greater than permitted by plant technical specifications. This violation was dispositioned as NCV 05000323/2010007-06, “Second Level Undervoltage Relay Time Delay to Initiate Load Shed and Sequencing Upon the Diesel Generator is Adequate to Assure Plant Safety.”

b. Findings

Introduction. The inspectors identified a Severity Level IV noncited violation of 10 CFR 50.73(a)(2)(i)(B) and 10 CFR 50.73(a)(2)(v)(B) after Pacific Gas and Electric failed to submit a required licensee event report within 60 days following discovery of a condition that could have prevented the fulfillment of a safety function and that was prohibited by the plant technical specifications.

Discussion. On March 9, 2010, Pacific Gas and Electric identified that degraded voltage protection scheme, required by Technical Specification 3.3.5, “Loss of Power Diesel Generator Start Instrumentation,” was inadequate to ensure plant safety. The licensee concluded that protection scheme was not adequate to protect operating engineering safety feature pump motors from overcurrent conditions when aligned to automatically transfer to the preferred offsite power source. The inspectors concluded that this condition was reportable under 10 CFR 50.73(a)(2)(v)(B) because the safety function was lost for both degraded voltage protection channels on all three safety related 4 kV busses. The inspectors concluded that this condition also rendered operating engineering safety feature pumps inoperable when aligned to the preferred offsite power source. Between March 7 and March 10, 2010, the licensee operated Unit 2 in a condition prohibited by plant technical specifications. Plant operators removed component cooling water pump 2-2 from service for maintenance and aligned component cooling water pump 2-3 to the preferred offsite power source. The inspectors concluded that this configuration was reportable under 10 CFR 50.73(a)(2)(i)(B) because the number of operable vital component cooling water loops was reduce below the minimum required by Technical Specification 3.7.7, “Vital Component Cooling Water System.”

The inspectors concluded that the licensee’s less than adequate past operability and reportability evaluation of the degraded protection scheme was a performance deficiency. The licensee updated the nonconforming condition in the corrective action program as Notification 50301167 on March 9, 2010. Procedure OM7.ID1, “Problem Identification and Resolution,” and Procedure XI1.ID2, “Regulatory Reporting Requirements and Reporting Process,” required plant personnel evaluate the condition for past operability and reportability as a licensee event report. However, the licensee’s evaluation was not adequate to identify the inoperable engineering safety feature pumps or the loss of safety function of the protection scheme. The licensee entered the failure to submit an adequate licensee event report into the corrective action program on May 11, 2010, and subsequently submitted revised Licensee Event Report 05000275/2010-002-01, “Potential Loss of Safety-Related Pumps due to

Degraded Voltage During Postulated Accidents,” to include the required reporting criteria.

Analysis. The inspectors evaluated this violation using the traditional enforcement process because the failure to submit a required event report affected the NRC’s ability to perform its regulatory function. Consistent with the guidance in Section IV.A.3 and Supplement I, Paragraph D.4, of the NRC Enforcement Policy, the inspectors concluded the violation was a Severity Level IV because the licensee failed to submit a required licensee event report. The inspectors also concluded that the violation was a finding under the reactor oversight process because the failure of licensee personnel to adequately evaluate a condition adverse to quality for operability and reportability, as required by the station procedures, was a performance deficiency. The inspectors concluded that the finding is more than minor because the failure to perform adequate operability and reportability evaluations of degraded plant equipment could reasonably be seen to lead to a more significant safety concern. The inspectors concluded that the finding had very low safety significance because the failure to adequately evaluate the condition for past operability and reportability did not result in an actual loss of a system safety function or equipment required by technical specifications, or involve the loss or degradation of equipment specifically designed to mitigate a seismic, flooding, or severe weather initiating event, and did not involve the total loss of any safety function that contributes to an external event initiated core damage accident sequence. This finding has a crosscutting aspect in the area of problem identification and resolution, associated with the corrective action program component because the licensee failed to perform an adequate evaluation of the degraded voltage protection scheme such that the resolutions address causes and extent of conditions as necessary [P.1(c)].

Enforcement. Title 10 of the Code of Federal Regulations 50.73(a)(2)(i)(B) required the licensee to submit a licensee event report within 60 days after the discovery of any condition prohibited by the plant technical specifications and 10 CFR 50.73(a)(2)(v)(B) required the licensee to submit a licensee event report for an event or condition that alone could have prevented a safety system functional failure. Contrary to the above, on May 10, 2010, Pacific Gas and Electric failed to submit the required licensee event report following a condition prohibited by the plant technical specifications and an event or condition that alone could have prevented safety system functional failure 60 days after discovery on March 9, 2010. This is a Severity Level IV noncited violation consistent with Section 7.10 and Supplement I, Paragraph D.4, of the NRC Enforcement Policy. Because this finding is of very low safety significance and has been entered into the corrective action program as Notification 50316653, this violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy: NCV 05000275; 05000323/2010003-03, “Failure to Report a Condition that Could Have Prevented the Fulfillment of a Safety Function.”

.2 (Closed) Licensee Event Report 05000275/2010-002-01: Potential Loss of Safety-Related Pumps due to Degraded Voltage During Postulated Accidents

On March 9, 2010, Pacific Gas and Electric engineers identified that degraded voltage setpoints, specified by Technical Specification 3.3.5, “Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation,” were inadequate to assure plant safety. Plant engineers determined that operating engineering safety feature pump motors were not adequately protected from overcurrent conditions by the degraded voltage protection scheme. On March 12, 2010, the licensee implemented administrative controls, as

discussed in NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety," to raise the first level degraded voltage setpoints. The licensee revised this licensee event report to include all required reporting criteria.

The inspectors concluded that the condition resulted in a violation because the degraded voltage protection scheme and operating engineering safety feature pumps were inoperable for a period greater than permitted by plant technical specifications. This violation was dispositioned as NCV 05000323/2010007-06, "Second Level Undervoltage Relay Time Delay to Initiate Load Shed and Sequencing Upon the Diesel Generator is Adequate to Assure Plant Safety."

.3 Unusual Event After a Chemical Spill in the Protected Area

a. Scope

On June 9, 2010, Pacific Gas and Electric declared an Unusual Event following a chemical spill. The spill occurred in the condensate polisher buttress area after a drain valve leak occurred during a sodium hydroxide transfer. Onsite personnel responded and stopped the leak. No personnel injuries or equipment damage occurred. The inspectors responded to the site and reviewed the licensee actions with respect to the site emergency plan.

b. Findings

No findings were identified.

.4 Alert After a Carbon Dioxide Fire Protection Discharge in the Turbine Building

a. Scope

On June 23, 2010, Pacific Gas and Electric declared an Unusual Event for Unit 1 following an accidental discharge of carbon dioxide fire suppressant into the Unit 1 main turbine lube oil reservoir room. The licensee subsequently upgraded the notification to an Alert after identifying that the atmosphere in the room was immediately dangerous to life and health. The inspectors concluded that no safety-related equipment was impacted and no personnel injuries occurred as a result of the event. The licensee requested offsite assistance from the California Fire Department to supplement the event response. The inspectors responded to the site and reviewed the licensee actions with respect to the site emergency plan.

b. Findings

No findings were identified.

40A6 Meetings

Exit Meeting Summary

On June 28, 2010, the inspectors presented the inspection results to Mr. J. Becker, and other members of the licensee staff. The licensee acknowledged the issues presented. The

inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

On May 27, 2010, the inspectors presented the radiation safety inspection results to Mr. J. Welsch, Operations Services Director, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

40A7 Licensee-Identified Violations

The following finding of very low safety significance (Green) was identified by the licensee and is a violation of NRC requirements which meets the criteria of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a noncited violation.

Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criteria V, "Instructions, Procedures, and Drawings," required that activities affecting quality shall be prescribed by procedures, and shall be accomplished in accordance with these procedures. Procedure TS6.ID2, "Control and Accountability of Special Nuclear Material," Revision 21, Attachment 7.15, "Spent Fuel Pool Decay Heat Loading Requirements," specified restrictions for placement of recently discharged spent fuel assemblies in the spent fuel pool. Contrary to this, on April 27, 2010, Pacific Gas and Electric identified five recently discharged fuel assemblies improperly located in the spent fuel pool. The licensee took corrective action to restore the spent fuel pool configuration consistent with procedural requirements. The inspectors used Inspection Manual Chapter 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," to analyze the finding. The inspectors concluded that the failure to accomplish an activity affecting quality in accordance with Procedure TS6.ID2, Attachment 7.15, was a Green finding of very low safety significance because the finding did not result in loss of cooling to the spent fuel pool, whereby operator or equipment failures could preclude restoration of cooling prior to boiling, did not result from fuel handling errors that caused damage to fuel clad integrity or a dropped assembly, and did not result in a loss of spent fuel pool inventory greater than 10 percent of the spent fuel pool volume. Pacific Gas and Electric entered the issue into the corrective action program as Notification 50314008.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

J. Becker, Site Vice President
W. Guldemon, Director, Site Services
T. Baldwin, Manager, Regulatory Services
K. Peters, Station Director
M. Somerville, Manager, Radiation Protection
J. Nimick, Manager, Operations
J. Welsch, Director, Operations Services

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000275/2010003-01	NCV	Failure to Perform Unit 1 Containment Concrete Inspections (Section 4OA2)
05000275; 05000323/2010003-01	NCV	Inadequate Corrective Actions Following Identification of a Nonconservative Technical Specification (Section 4OA2)
05000275; 05000323/2010003-03	NCV	Failure to Report a Condition that Could Have Prevented the Fulfillment of a Safety Function (Section 4OA3)

Closed

05000275/2010-002-00	LER	Potential Loss of Safety-Related Pumps due to Degraded Voltage During Postulated Accidents (Section 4OA3)
05000275/2010-002-01	LER	Potential Loss of Safety-Related Pumps due to Degraded Voltage During Postulated Accidents (Section 4OA3)

LIST OF DOCUMENTS REVIEWED

Section 1R04: Equipment Alignments

NOTIFICATIONS

50264253 50199650 50197079

Section 1R11: Licensed Operator Requalification Program

PROCEDURES/DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
TQ2.DC3	Licensed Operator and Shift Technical Advisor Continuing Training Programs	20
TQ2.DC2	Licensed Operator and Shift Technical Advisor Initial Training Program	18

TQ2.ID4	Training Program Implementation	18
OP1.DC10	Conduct of Operations	24
EOP ECA-0.0	Loss of All Vital AC Power	25
Simulator Event Scenario FRH1-D	Loss of Secondary Heat Sink	16
Simulator Event Scenario ECA00-A	LOCA/Loss of All AC	17
Lesson R096S2	NO Nuclear Operator Actions on Loss of All AC	1
Lesson R096C3	EOP Bases ECA-0.0	1
HECA00BG	ECA-0.0 Background	2

Section 1R12: Maintenance Effectiveness

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
MA1.ID17	Maintenance Rule Monitoring Program	22

NOTIFICATIONS

50321833	50313788	50256798	50301874	50252768
50036241				

DOCUMENTS

Maintenance Rule Summary Report, May 27, 2010
Maintenance Rule Expert Panel Meeting Minutes, February 18, 2010

Section 1R13: Maintenance Risk Assessments and Emergent Work Control

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
PRA10-02	PRA Impact of Missed EGD Surveillance	0
AD7.DC6	On-Line Maintenance Risk Management	15A
AD7.ID4	On-Line Maintenance Scheduling	14

NOTIFICATIONS/ACTION REQUESTS

50308251	50309953	50310148	A0651244	A0664173
A0720643	50309451	A0741037	50243652	50291026
50308698	50042970	50044652	50228353	A0736955
A0731700	A0737406	A0738488	A0738833	

Section 1R15: Operability Evaluations

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
OP J-2: VIII	Guidelines for Reliable Transmission Service for DCPD	15
OM7.ID12	Operability Determinations	

NOTIFICATIONS/ACTION REQUESTS

50309947	50313433	A0593710	A0603631	A0618445
50310246	50316661	50316662	50316663	50316665
50263354	50288722	50291003	50292318	50299046
50306493	50307765	50316814	50317870	50315163

Section 1R19: Postmaintenance Testing

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
STP P-21	Routine Surveillance Test of Auxiliary Saltwater Pump 2-1	27
STP V-3R1	Exercise 10% Atmospheric Dump Valves	48
STP V-2U3B	Exercise S/G No. 3 10% Steam Dump Valve PCV-21	2
STP I-72B	Seismic Trip Channel Calibration	20

DOCUMENTS

Order 64051358

Viper Analysis Data Sheet – Valve PCV-21

Order 60026028

Order 64004896

Section 1R22: Surveillance Testing

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
STP V-3P6B	Exercising Valves LCV-15 and 113 Auxiliary Feedwater Pump Discharge	17
STP P-AFW-23	Routine Surveillance test of Motor-Driven Auxiliary Feedwater Pump 2-3	17
STP M-4	Routine Surveillance Test of the Auxiliary Building Safeguards Air Filtration System	35
STP M-21-A.1	Diesel Engine Analysis	7
STP M-9A	Diesel Engine Generator Routine Surveillance Test	84

Section 2RS06: Radiation Gaseous and Liquid Effluent Treatment

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
CY2	Radiological Monitoring and Controls Program	7
CY1ID1	Radioactive Effluent Controls Program	11
CAP A-8	Off-Site Dose Calculations	34
CAP A-6	Gaseous Radwaste Discharge Management	31
CAP A-11	Liquid Radwaste Processing System Selection	8
CAP E-5:l	Liquid Radwaste and Miscellaneous Discharge Sampling	3
CAP E-19	Routine Plant Vent Radioactive Effluent Sampling	15
STP M-41	Fuel Handling Building Ventilation System – DOP and Halide Penetration Tests	18A

AUDITS, SELF-ASSESSMENTS, AND SURVEILLANCES

<u>TITLE</u>	<u>REVISION / DATE</u>
Quality Performance Assessment Report	August 31 to December 12, 2008
Quality Performance Assessment Report	December 13, 2008 to March 19, 2009 / Revision 1
Quality Performance Assessment Report	March 19 to July 19, 2009
Quality Performance Assessment Report	July 20 to November 13, 2009
Quality Performance Assessment Report	November 14 to April 16, 2010

NOTIFICATIONS

50206241	50288384	50231151	50241094	50270046
50281350	50288067	50205373	50205932	50276724
50277205	50307746	50308222		

10 CFR 50.75g NOTIFICATIONS

50086258	50194831	50195081	50195082	50230540
50262461	50308622			

RELEASE PERMITS

G 2010-2-19	L 2010-0-29	L 2010 2-19
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INPLACE FILTER TESTING RECORDS

<u>TITLE</u>	<u>DATE</u>
Unit 1 Control Room Ventilation	April 20, 2009
Unit 2 Control Room Ventilation	May 4, 2009
Unit 1 Auxiliary Building Ventilation	January 20, 2009
Unit 2 Auxiliary Building Ventilation	September 28, 2009

Unit 1 Fuel Handling Building

January 13, 2009

Unit 2 Fuel Handling Building

June 15, 2009

MISCELLANEOUS DOCUMENTS

<u>TITLE</u>	<u>DATE</u>
Results of Radiochemistry Cross Check Program	May 16, 2008 to November 13, 2009
Annual Radioactive Effluent Release Report	2008
Annual Radioactive Effluent Release Report	2009

Section 2RS07: Radiological Environment Monitoring Program

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
RCP EM-1	Radiological Environmental Biological Sampling	10
RCP EM-2	Radiological environmental Air Sampling	12
RCP EM-3	Use of Panasonic Environmental Thermoluminescent Dosimeters	6
RCP EM-5	DCPP Groundwater Sampling	2
RP1.ID11	Environmental Radiological Monitoring Procedure	9
CY2	Radiological Monitoring and Controls Program	7

AUDITS, SELF-ASSESSMENTS, AND SURVEILLANCES

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
20459	PPL/NUPIC Supplier Audit for GEL Laboratories, LLC	2009

NOTIFICATIONS

50033862	50185472	50192765	50194831	50195081
50195082	50293791	50300029	50304215	50308622

CALIBRATION AND MAINTENANCE RECORDS

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
I40M559B	Primary Meteorological System Calibration	November 12, 2009
I40M559B	Primary Meteorological System Calibration	May 13, 2010
I40M569B	Backup Meteorological System Calibration	September 29, 2009
I40M569B	Backup Meteorological System Calibration	January 26, 2009
3194	Air Flow Calibrator	March 5, 2009
8083	Air Flow Calibrator	April 6, 2010
8086	Air Flow Calibrator	April 6, 2010
8087	Air Flow Calibrator	April 6, 2010

8883

Air Flow Calibrator

April 6, 2010

MISCELLANEOUS DOCUMENTS

<u>TITLE</u>	<u>DATE</u>
Annual Environmental Operating Report	2008
Annual Environmental Operating Report	2009
Land Use Census	2008
Land Use Census	2009
Inter-laboratory Comparison	2008
Inter-laboratory Comparison	2009
GEL Laboratories, LLC Quality Assurance Plan	

Section 2RS08: Radioactive Solid Waste Processing and Radioactive Material Handling Storage, and Transportation

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
RP2	Solid Low-Level Radioactive Waste Management	6
RP1.DC3	Transportation Security Plan	1
RP2.DC1	Radioactive Waste Classification Program	4A
RP2.DC2	Radwaste Solidification Process Control Program	15
RCP RW-3	Radioactive Waste Nuclide Fractions and Correlation Factor Determination	18
RCP RW-4	Solid Radioactive Waste Shipment	29
RCP RW-5	Receiving, Loading and Releasing of Transport Vehicle for Radioactive Waste Shipment	14
RCP RW-8	Radioactive Waste Curie Content Calculations	4A
RCP D-630	Receiving and Opening Radioactive Material Packages	6
RCP D-631	Radioactive Material Shipments	9
DPP PC-24	Operation of the 10 CFR 61 Sample Analysis Program	1
CF5.ID1	Receipt of Materials	9

AUDITS, SELF-ASSESSMENTS, AND SURVEILLANCES

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
EDMS 081330028	2008 Radiation Protection Program and Solid Radioactive Waste Management (Process Control) and Transport Program	July 17, 2008

NOTIFICATIONS

50181263	50199565	50200658	50203898	50230594
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50251906 50251907 50264477 50267118 50293588
 50297602 50309407

RADIOACTIVE MATERIAL SHIPMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
RWS-09-001	Radioactive Material LSA	May 13, 2009
RWS-09-002	Dewatered Resin	May 20, 2009
RMS-09-170	Contaminated Equipment UN2910	October 28, 2009
RMS-09-185	LSA Exclusive Use	December 2, 2009

MISCELLANEOUS

<u>NUMBER</u>	<u>TITLE</u>	<u>DATE</u>
10102	Rad Waste Building Monthly Survey	May 27, 2010
10117	Changeout of U2 RCP Seal Water Return Filter	May 26, 2010
7152	4 th Quarter 2009 DAW Smears	October 19, 2009
4219	2009 2 nd Quarter DAW Smears	April 13, 2009
	Non-Gamma Emitting Nuclide Correlation Factors 2009 Filter Composite	March 06, 2009
	Non-Gamma Emitting Nuclide Correlation Factors 2009 RWIX01	March 22, 2009
	Summary Sheet – Radwaste Correlation Factors	January 19, 2010
	WMG-5115-RE-120; Unit 1 Steam Generators, Final Characterization	

Section 40A1: Performance Indicator Verification

NOTIFICATIONS

50292943

MISCELLANEOUS

Review of LERs of past three years for SSFF

Section 40A2: Identification and Resolution of Problems

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION/DATE</u>
OM7.ID1	Problem Identification and Resolution	32
HPP-1073-400	Procedure for MPC Transport at DCPP	7
MP M-7-RX.6	Reactor Vessel Closure Head Installation	0
OP L-6	Cold Shutdown/Refueling	60
OP B-8D	Refueling Prerequisites	51

Section 40A2: Identification and Resolution of Problems

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION/DATE</u>
AD8.DC54	Containment Closure	13
OP1.DC30	Operations Standing Orders	February 2, 2009
OP B-8DS2	Core Loading	45
AD8.DC56	Containment Outage Ventilation Planning and Operation	5
XI1.ID2	Regulatory reporting Requirements and reporting Processes	29
OP1.DC38	Safety Function Determination Program	3

NOTIFICATIONS

50318618	50315194	50316979	50317210	50310054
50209442	50314165	50313683	50258302	50257936
50313159				