

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

November 3, 2005

James J. Sheppard, President and Chief Executive Officer STP Nuclear Operating Company P.O. Box 289 Wadsworth, Texas 77483

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION - NRC INTEGRATED INSPECTION REPORT 05000498/2005004 AND

05000499/2005004

Dear Mr. Sheppard:

On September 26, 2005, the US Nuclear Regulatory Commission (NRC) completed an inspection at your South Texas Project Electric Generating Station, Units 1 and 2, facility. The enclosed integrated report documents the inspection findings which were discussed on October 6, 2005, with you and members of your staff.

The inspection examined activities conducted under your licenses as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your licenses. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

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

Sincerely,

/RA/

Claude E. Johnson, Chief Project Branch A Division of Reactor Projects Dockets: 50-498

50-499

Licenses: NPF-76

NPF-80

Enclosure:

NRC Inspection Report 05000498/2005004 and 05000499/2005004 w/Attachment: Supplemental Information

cc w/Enclosure:

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Vice President, Oversight

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SISP Review Completed:	CEJ_	ADAMS:	Yes	□ No	Initials:	CEJ
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RIV:RI:DRP/A	SRI:DRP/A	PE:DRP/A	SPE:DRP/A	C:DRS/PSB	C:DRS/PEB
JLTaylor	JCruz	TBrown	TRFarnholtz	MPShannon	LJSmith
E- CEJ	E-CEJ	NA	/RA/	/RA/	/RA/
10/26/05	10/26/05	10/ /05	10/25/05	10/21/05	10/26/05
C:DRS/EB1	C:DRS/OB	C:DRP/A			
NFO'Keefe	ATGody	CEJohnson			
/RA/	/RA/	/RA/			
10/25/05	10/23/05	11/3/05			

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

Dockets: 50-498, 50-499

Licenses: NPF-76

NPF-80

Report No: 05000498/2005004

05000499/2005004

Licensee: STP Nuclear Operating Company

Facility: South Texas Project Electric Generating Station, Units 1 and 2

Location: FM 521 - 8 miles west of Wadsworth

Wadsworth, Texas 77483

Dates: June 27 through September 26, 2005

Inspectors: J. Cruz, Senior Resident Inspector

J. Taylor, Resident Inspector T. Brown, Project Engineer D. Carter, Health Physicist B. Tindell, Reactor Inspector

Approved By: C. Johnson, Chief

Project Branch A

Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000498/2005004, 05000499/2005004; 06/27/05 - 09/26/05; South Texas Project Electric Generating Station; Units 1 & 2; Integrated Resident Report.

The report covered a three month period of inspection completed by the resident inspectors and project engineers and announced inspections by regional inspectors. **No** violations were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A.	NRC-Identified and Self-Revealing Findings
	None

B. <u>Licensee-Identified Violations</u>

None.

REPORT DETAILS

Summary of Plant Status

South Texas Project Unit 1 began the period at essentially 100 percent power. On August 27, 2005, Unit 1 reduced power to approximately 15 percent reactor power to isolate and crimp a leaking reactor coolant system sample line. On August 28, 2005, Unit 1 returned to 100 percent power. Unit 1 operated at essentially 100 percent power for the balance of the inspection period.

South Texas Project Unit 2 operated at essentially 100 percent power throughout the inspection period. On September 19, 2005, Unit 2 commenced a scheduled coastdown for Refueling Outage 2RE11.

Additionally, on September 22, 2005, both Units entered storm crew operations in response to Hurricane Rita. After the hurricane made landfall there was no effect on the South Texas Project site and the site returned to normal operations on September 25, 2005.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

a. Inspection Scope

The inspectors completed a review of the licensee's readiness of seasonal susceptibilities involving hurricanes. The inspectors performed the following in response to the projected adverse weather conditions of Hurricane Rita: (1) reviewed plant procedures, the Updated Safety Analysis Report, and Technical Specifications to ensure that operator actions defined in adverse weather procedures maintained the readiness of essential systems; (2) walked down portions of the below listed system to ensure that adverse weather protection features (heat tracing, space heaters, weatherized enclosures, temporary chillers) were sufficient to support operability, including the ability to perform safe shutdown functions; (3) evaluated operator staffing levels to ensure the licensee could maintain the readiness of essential systems required by plant procedures; and (4) reviewed the corrective action program to determine if the licensee identified and corrected problems related to adverse weather conditions.

C (Common) Hurricane Rita preparations, September 19-25

The inspectors completed one sample.

1R04 Equipment Alignment (71111.04)

.1 Partial System Walkdown

a. Inspection Scope

The inspectors performed two partial risk important system: (1) walkdowns listed below, and reviewed plant procedures and documents to verify that critical portions of the

selected systems were correctly aligned; and (2) compared deficiencies identified during the walk down to the licensee's corrective action program to ensure problems were being identified and corrected.

- (Unit 1) The inspectors verified the alignment and condition of Safety Injection System Train A . The inspectors verified that the system equipment and control board were aligned in accordance with Plant Operating Procedure 0POP02-SI-0002, "Safety Injection System Lineup," Revision 17, August 31 and September 2
- (Unit 2) The inspectors verified the alignment and condition of Essential Cooling Water System Train B while Train A was out of service. The inspectors verified that the system equipment and control board were aligned in accordance with Plant Operating Procedure 0POP02-EW-0001, "Essential Cooling Water Operations," Revision 36, July 14

The inspectors completed two samples.

b. Findings

No findings of significance were identified.

.2 <u>Semi-Annual System Walkdown</u>

a. Inspection Scope

The inspectors reviewed the following: (1) plant procedures, drawings, the Updated Safety Analysis Report, Technical Specifications, and vendor manuals to determine the correct alignment of the system; (2) reviewed outstanding design issues, operator work arounds, and corrective action program documents to determine if open issues affected the functionality of the system; and (3) verified that the licensee was identifying and resolving equipment alignment problems.

 (Unit 1) The inspectors verified the alignment and condition of the accessible portions of the Auxiliary Feedwater System. The inspectors verified that the system equipment and control board were aligned in accordance with Plant Operating Procedure 0POP02-AF-0001, "Auxiliary Feedwater," Revision 21, August 3

The inspectors completed one sample.

b. Findings

1R05 <u>Fire Protection (71111.05)</u>

Quarterly Inspection

a. Inspection Scope

The inspectors walked down seven plant areas to assess the material condition of active and passive fire protection features and their operational lineup and readiness. The inspectors: (1) verified that transient combustibles and hot work activities were controlled in accordance with plant procedures; (2) observed the condition of fire detection devices to verify they remained functional; (3) observed fire suppression systems to verify they remained functional; (4) verified that fire extinguishers and hose stations were provided at their designated locations and that they were in a satisfactory condition; (5) verified that passive fire protection features (electrical raceway barriers, fire doors, fire dampers, steel fire proofing, penetration seals, and oil collection systems) were in a satisfactory material condition; (6) verified that adequate compensatory measures were established for degraded or inoperable fire protection features; and (7) reviewed the corrective action program to determine if the licensee identified and corrected fire protection problems. Plant areas inspected are listed below:

- (Unit 1) Component Cooling Water heat exchanger and valve rooms (Fire Zones Z111, 129), July 8, 2005
- (Unit 2) Component Cooling Water heat exchanger and valve rooms (Fire Zones Z111, 129), July 14, 2005
- (Unit 2) Safety Injection/Containment Spray cubicles, HVAC equipment room (Fire Zones Z303, 305-307), July 18, 2005
- (Unit 1) Auxiliary Shutdown Panel, Train A, B, and C Sequencer rooms and Halon Storage rooms (Fire Zones Z071-073, 016,017, and 037), July 20, 2005
- (Unit 1) Pipe Penetration Area, Waste Monitoring, and Refueling/Reactor Makeup Water Tank rooms (Fire Zones Z133,136,137,103,104), August 10, 2005
- (Unit1) Reactor Containment Building (Fire Zones Z215-218), August 11, 2005
- (Unit 2) Pipe Penetration Area, Waste Monitoring, and Refueling/Reactor Makeup Water Tank rooms (Fire Zones Z133,136,137,103,104), August 18, 2005

The inspectors completed **seven** samples.

b. Findings

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope

The inspectors observed testing and training of senior reactor operators and reactor operators on July 19, 2005, to identify deficiencies and discrepancies in the training, to assess operator performance, and to assess the evaluator's critique. The training scenario involved a 125vdc panel failure with an increasing reactor coolant system leak in containment and additional equipment failures.

The inspectors completed **one** sample.

b. Findings

No findings of significance were identified.

1R12 Maintenance Implementation (71111.12)

.1 Quarterly Inspection

a. Inspection Scope

The inspectors reviewed the maintenance activities listed below to: (1) verify the appropriate handling of structure, system, and component (SSC) performance or condition problems; (2) verify the appropriate handling of degraded SSC functional performance; (3) evaluate the role of work practices and common cause problems; and (4) evaluate the handling of SSC issues reviewed under the requirements of the maintenance rule, 10 CFR 50 Appendix B, and the Technical Specifications.

- (Unit 1) Engineered safety feature load sequencer input/output module replacement (Condition Report (CR) 05-10245), September 13
- (Common) Essential Cooling Water System remained in a(1) status from June 2004 through August 2005 due to system unavailability performance criteria for three of six trains (CR 04-08283), September 16

The inspectors completed two samples.

b. Findings

.2 <u>Biennial Maintenance Rule Implementation</u> (71111.12B)

a. <u>Inspection Scope</u>

Periodic Evaluation Reviews

The inspectors reviewed the licensee's overall implementation of the Maintenance Rule, 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The inspectors reviewed the licensee's Maintenance Rule periodic assessments for 2003 and 2005. The resulting adjustments to the balance of equipment reliability and availability were also evaluated.

The inspectors reviewed systems and structures that had suffered some degraded performance or condition to assess the licensee's periodic evaluation activities. The inspectors selected the following five systems for a detailed review:

- Auxiliary Feedwater
- Safety Injection
- 120 Volt AC Vital Power
- Electrical Auxiliary Building
- Diesel Generator Building

For these systems, the inspectors reviewed the use of performance history and operating experience in adjusting preventive maintenance, (a)(1) goals, and (a)(2) performance criteria. For structures, the inspectors reviewed the Maintenance Rule Structures Inspection Summary Report. The inspectors also reviewed adjustments to the scope of the Maintenance Rule Program and adjustments to the definitions of availability hours and required available hours.

b. Findings

No findings of significance were identified.

.3 Identification and Resolution of Problems

a. Inspection Scope

The inspectors evaluated the use of the Corrective Action Program within the Maintenance Rule Program. The review was accomplished by the examination of a sample of corrective action documents and work orders. The purpose of the review was to determine that the identification of problems and implementation of corrective actions were acceptable.

b. Findings

<u>Introduction</u>. An unresolved item was identified for untimely corrective actions related to a potential for essential cooling water cables to be submerged in water. This is an unresolved item pending the discovery of the current condition of these cables.

<u>Description</u>. South Texas Project personnel wrote a Maintenance Rule Structures Inspection Summary Report, which identified that the grade around Manhole B0XYABKEM52 had been raised. This allowed rainwater to enter the manhole as a catch basin for the area. This was also documented in CR 03-18389. The inspectors and the licensee walked down the manholes in the yard and noted that there were more manholes that were affected by the grade around them. Some of the manholes lead to cable vaults which contained power cables for the Unit 1 essential cooling water pumps. These cables were rated for wet/dry service, but were not rated for continuous submergence in water. At the time of the onsite inspection, there had been no corrective actions taken for the 2003 condition report.

When questioned by the inspectors, licensee personnel lowered an instrument through a small opening in one of the manholes and discovered approximately four feet of water in Manhole B0XYABKEM51. According to design drawings, the as-found water level was below the cables. The licensee had not measured the water level in the other potentially affected manholes at the time of the inspection.

However, the licensee periodically tests the insulation resistance of the affected cables, and the recent test results were satisfactory. During a phone call on September 29, 2005, the licensee stated that they had added a silicone bead around some of the potentially affected manholes, preventing further water intrusion. The licensee also stated that they plan further inspection on the cable vaults. The licensee is tracking this concern in CR 05-11548 and CR 05-11558.

<u>Analysis</u>. The results of an inspection on the affected cable vaults will be used to determine if this unresolved item is a performance deficiency. NRC Manual Chapter 0612, Power Reactor Inspection Reports, will be used to process this item when more information is received.

<u>Enforcement</u>. More information is needed to determine if the licensee's corrective actions are adequate from the 2003 condition report. This item remains unresolved pending the results of the licensee's investigation of the affected cable vaults (URI 05000498;499/2005004-01, Potential for Submerged Cables).

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

Risk Assessment and Management of Risk

a. Inspection Scope

The inspectors reviewed four assessment activities listed below to verify: (1) performance of risk assessments when required by 10 CFR 50.65 (a)(4) licensee procedures prior to changes in plant configuration for maintenance activities, and plant operations; (2) the accuracy, adequacy, and completeness of the information considered in the risk assessment; (3) that the licensee recognizes, and/or enters as applicable, the appropriate licensee-established risk category according to the risk

assessment results and licensee procedures, and (4) the licensee identified and corrected problems related to maintenance risk assessments.

- (Unit 1) Evaluation of planned risk profiles for essential cooling water Train A extended allowed outage, July 5, 2005
- (Unit 2) Evaluation of planned risk profiles for essential cooling water Train A extended allowed outage, July 13, 2005
- (Unit 2) Evaluation of risk for installation of Temporary Modification 05-8241-1 to jumper 125 VDC switchboard 2A battery cell #23 (Evaluation 1397), July 20, 2005
- (Unit 1) Evaluation of risk for installation of Design Change Package 05-4876-2 to eliminate nuisance alarms associated with Class 1E 10 kV Inverter 1202 (Evaluation 1382), July 27, 2005

The inspectors completed four samples.

b. Findings

No findings of significance were identified.

1R14 Personnel Performance During Nonroutine Plant Evolutions (71111.14)

a. Inspection Scope

The inspectors: (1) reviewed operator logs, plant computer data, and/or strip charts for the below listed evolutions to evaluate operator performance in coping with non-routine events and transients; (2) verified that the operator response was in accordance with the response required by plant procedures and training, and (3) verified that the licensee has identified and implemented appropriate corrective actions associated with personnel performance problems that occurred during the non-routine evolutions sampled.

- (Unit 2) Unplanned power reduction and recovery due to spurious momentary excursion of Loop 1 Average Temperature instrumentation, July 27, 2005
- (Unit 1) Planned power reduction to approximately 15%, and subsequent return 100%, to isolate and crimp a leaking reactor coolant system sample line, August 27-28, 2005

The inspectors completed **two** samples.

b. Findings

1R15 Operability Evaluations (71111.15)

a. <u>Inspection Scope</u>

The inspectors: (1) reviewed plants status documents such as operator shift logs, emergent work documentation, deferred modifications, and standing orders to determine if an operability evaluation was warranted for degraded components; (2) referred to the Updated Safety Analysis Report and design basis documents to review the technical adequacy of licensee operability evaluations; (3) evaluated compensatory measures associated with operability evaluations; (4) determined degraded component impact on any Technical Specifications; (5) used the Significance Determination Process to evaluate the risk significance of degraded or inoperable equipment; and who (6) verified that the licensee has identified and implemented appropriate corrective actions associated with degraded components.

- (Unit 2) Engineering evaluation of through wall leakage in essential cooling water Train A piping on discharge side of the component cooling water Train A heat exchanger (CR 05-8601-1), July 6, 2005
- (Unit 1) Engineering evaluation of Nuclear Instrumentation Power Range NI-44 meter reading low (CR 05-8987-2), July 14, 2005
- (Unit 2) Engineering evaluation of piping damage in essential cooling water Train B piping on discharge side of the component cooling water Train B heat exchanger (CR 05-10323-1), August 22, 2005
- (Unit 2) Engineering evaluation of essential cooling water Train B following code repairs after the discovery of a missing segment of piping and the indeterminate location of the broken pieces of pipe within the system (CR 05-10323-2), August 23, 2005
- (Unit 1) Engineering evaluation of through wall de-alloying indication on a flange installed on essential cooling water Train B return line from the 150 ton Essential Chiller 11B (CR 05-9622-2), August 24, 2005
- (Unit 1) Engineering evaluation of essential cooling water screen wash booster Pump 1C following the failure to develop minimum required flow rate during a surveillance procedure (CR 05-11400), September 16, 2005

The inspectors completed **six** samples.

b. Findings

1R16 Operator Workarounds (71111.16)

Cumulative Review of the Effects of Operator Workarounds

a. <u>Inspection Scope</u>

The inspectors reviewed the cumulative effects of operator workarounds in Unit 2, on July 22, 2005, to determine: (1) the reliability, availability, and potential for misoperation of a system; (2) if multiple mitigating systems could be affected; (3) the ability of operators to respond in a correct and timely manner to plant transients and accidents; and (4) if the licensee has identified and implemented appropriate corrective actions associated with operator workarounds.

The inspectors completed one sample.

b. Findings

No findings of significance were identified.

1R19 Post-maintenance Testing (71111.19)

a. <u>Inspection Scope</u>

The inspectors selected six postmaintenance test activities of risk significant systems or components listed below. For each item, the inspectors: (1) reviewed the applicable licensing basis and/or design-basis documents to determine the safety functions; (2) evaluated the safety functions that may have been affected by the maintenance activity; and (3) reviewed the test procedure to ensure it adequately tested the safety function that may have been affected. The inspectors either witnessed or reviewed test data to verify that acceptance criteria were met, plant impacts were evaluated, test equipment was calibrated, procedures were followed, jumpers were properly controlled, the test data results were complete and accurate, the test equipment was removed, the system was properly re-aligned, and deficiencies during testing were documented. The inspectors also reviewed the corrective action program to determine if the licensee identified and corrected problems related to post-maintenance testing.

- (Unit 1) Preventative Maintenance Work Order PM:MV-1-CC-86015277,
 "Reactor Containment Fan Coolers Train A Chilled Water Supply Outboard Reactor Containment Isolation Valve Operator A1CCMOV0059," July 5, 2005.
- (Unit 2) Preventative Maintenance Work Order PM:EM-2-98000716, "High Head Safety Injection Pump 2A," Revision 05.0 and PM:MV-2-90001492, "High Head Safety Injection Pump 2A Miniflow First Isolation MOV Operator," Revision 06.0, review of documentation and observation of pump run and miniflow first isolation valve post-maintenance testing, July 12, 2005.

- (Unit 2) Plant Surveillance Procedure 0PSP03-DG-0003, "Standby Diesel Generator 13(23) Operability Test," Revision 28, post-maintenance testing associated with planned maintenance, July 30, 2005.
- (Unit1) Condition Report 05-2965-1 post-maintenance testing on residual heat removal Pump 1B discharge flow Transmitter FT-0868 following discovery of a root valve leak, August 11, 2005.
- (Unit 2) Preventative Maintenance Work Order PM:EM-2-96000643, "Train B Essential Chilled Water Chiller Unit 22B," Revision 02.0 (3V112VCH0005) and Plant Maintenance Procedure 0PMP05-CH-0001, Revision 26, "York Chiller Inspection and Maintenance 300-550 Tons," review of documentation and observation of chiller run following oil pump shaft keyway inspection and seal replacement post-maintenance testing, August 19, 2005.
- (Unit 2) Plant Surveillance Procedure 0PSP03-MS-0001, "Main Steam Valve Operability Test" Revision 25, post-maintenance testing associated with planned maintenance, August 23, 2005.

The inspectors completed **six** samples.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. <u>Inspection Scope</u>

The inspectors reviewed the Updated Final Safety Analysis Report, procedure requirements, and Technical Specifications to ensure that **seven** surveillance activities listed below demonstrated that the SSC's tested were capable of performing their intended safety functions. The inspectors either witnessed or reviewed test data to verify that the following significant surveillance test attributes were adequate: (1) preconditioning; (2) evaluation of testing impact on the plant; (3) acceptance criteria; (4) test equipment; (5) procedures; (6) jumper/lifted lead controls; (7) test data; (8) testing frequency and method demonstrated Technical Specification operability; (9) test equipment removal; (10) restoration of plant systems; (11) fulfillment of ASME Code requirements; (12) updating of performance indicator data; (13) engineering evaluations, root causes, and bases for returning tested SSC's not meeting the test acceptance criteria were correct; (14) reference setting data; and (15) annunciators and alarms setpoints. The inspectors also verified that the licensee identified and implemented any needed corrective actions associated with the surveillance testing.

• (Unit 1) Plant Surveillance Procedure 0PSP03-CC-0047, "Component Cooling Water Train 1A (2A) Valve Operability Test," Revision 11, July 5, 2005.

- (Unit 2) Plant Surveillance Procedure 0PSP03-CS-0001, "Containment Spray Pump 1A(2A) Inservice Test," Revision 8 and 0PEP-ZE-0008, "Non Intrusive Check Valve Testing," Revision 8, for 2N122XS10002A, July 13, 2005.
- (Unit 1) Plant Surveillance Procedure 0PSP03-RS-0001, "Monthly Control Rod Operability," Revision 18, July 19, 2005.
- (Unit 1) Plant Surveillance Procedure 0PSP03-RC-0006, "Reactor Coolant Inventory," Revision 15, to determine Reactor Coolant System leakage, July 26, 2005.
- (Unit 2) Plant Surveillance Procedure 0PSP03-SP-0009 B, "SSPS Activation Train B Slave Relay Test," Revision 28 for FV-4150/4152/4153, steam generator blowdown outside containment isolation valves, July 27, 2005.
- (Unit 1) Plant Surveillance Procedure 0PSP03-SP-0009 B, "SSPS Activation Train B Slave Relay Test," Revision 28 for FV-4150/4152/4153, steam generator blowdown outside containment isolation valves, July 29, 2005.
- (Unit 1) Plant Surveillance Procedure 0PSP03-RA-0001, "Containment Radiation Monitoring System Valve Operability Test," Revision 6, August 2, 2005.

The inspectors completed **seven** samples.

b. Findings

No findings of significance were identified.

1EP6 Drill Evaluation (71114.06)

a. Inspection Scope

One drill and simulator-based training evolution contributing to Drill/Exercise Performance (DEP) and Emergency Response Organization (ERO) Performance Indicators, the inspectors for the listed below: (1) observed the training evolution to identify any weaknesses and deficiencies in classification, notification, and Protective Action Requirements (PAR) development activities; (2) compared the identified weaknesses and deficiencies against licensee identified findings to determine whether the licensee is properly identifying failures; and (3) determined whether licensee performance is in accordance with the guidance of the NEI 99-02 document's acceptance criteria.

 On July 26, the inspectors observed a drill and simulator-based training evolution in which the scenario consisted of a main turbine trip with the failure of the reactor protection system to automatically trip the reactor. The manual trip of the reactor was followed by a large break loss of coolant accident. The scenario progressed in a manner which required the emergency response organization to declare and respond to a General Emergency. The inspectors completed one sample.

b. Findings

No findings of significance were identified.

RADIATION SAFETY

Cornerstone: Occupational Radiation Safety [OS]

2OS2 ALARA Planning and Controls (71121.02)

a. <u>Inspection Scope</u>

The inspector assessed licensee performance with respect to maintaining individual and collective radiation exposures as low as is reasonably achievable (ALARA). The inspector used the requirements in 10 CFR Part 20 and the licensee's procedures required by Technical Specifications as criteria for determining compliance. The inspector interviewed licensee personnel and reviewed:

Site specific ALARA procedures

Seven work activities of highest exposure significance completed during the last outage

Exposure tracking system

Workers use of the low dose waiting areas

Source-term control strategy for exposure reduction initiatives

Specific sources identified by the licensee for exposure reduction actions and priorities established for these actions, and results achieved since the last refueling cycle

Radiation worker and radiation protection technician performance during work activities in radiation areas, airborne radioactivity areas, or high radiation areas

Self-assessments, audits, and special reports related to the ALARA program since the last inspection

Corrective action documents related to the ALARA program and follow-up activities such as initial problem identification, characterization, and tracking

The inspector completed 7 of the required of the required 29 samples.

b. Findings

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems (71152)

.1 <u>Daily CR Review</u>

a. Inspection Scope

As required by Inspection Procedure 71152, "Identification and Resolution of Problems," and in order to help identify repetitive equipment failures or specific human performance issues for followup, the inspectors performed a daily screening of items entered into the licensee's corrective action program. This review was accomplished by reviewing hard copy or electronic summaries of each CR, attending various daily screening meetings, and accessing the licensee's computerized corrective action program database.

b. Findings and Observations

No findings of significance were identified.

.2 ALARA Planning and Controls

a. <u>Inspection Scope</u>

Section 2OS2 evaluated the effectiveness of the licensee's problem identification and resolution processes regarding exposure tracking, higher than planned exposure levels, and radiation worker practices. The inspector reviewed the corrective action documents listed in the attachment against the licensee's problem identification and resolution program requirements. No findings of significance were identified.

b. Findings and Observations

No findings of significance were identified.

4OA6 Meetings, Including Exit

The results of the ALARA inspection were presented to Mr. G. Parkey and other members of his staff on June 30, 2005.

The results of the biennial maintenance rule inspection were presented to Mr. James J. Sheppard, President and CEO and other members of licensee management on September 15, 2005.

The results of the resident inspection were presented to Mr. James J. Sheppard and other members of licensee management on October 6, 2005.

During each exit meeting, the inspectors asked the licensee representatives whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

Other Meetings

Mr. Claude Johnson, Branch Chief, Project Branch A, Division of Reactor Projects, visited the site and toured selected areas of the facility on September 13-16.

40A7 <u>Licensee-identified Violations</u>

None.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

- R. Aguilera, Radiological Manager, Radiological Engineering
- T. Bowman, Manager, Operations
- W. Bullard, Manager, Health Physics
- R. Gangluff, Manager, Chemistry
- E. Halpin, Vice President, Oversight
- J. Jump, Manager, Process Improvement Leadership Team
- M. McBurnett, Manager, Quality and Licensing
- M. Meier, General Manager, Station Support
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- R. Savage, Senior Staff Specialist
- J. Sheppard, President and CEO
- D. Swett, Radiological Manager, ALARA
- D. Towler, Manager, Quality
- J. Winters, Maintenance Rule Coordinator
- T. Walker, Manager, Quality

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Open

05000498;499/2005004-01 URI Potential For Submerged Cables

LIST OF DOCUMENTS REVIEWED

In addition to the documents identified in the inspection report, the following documents were selected and reviewed by the inspectors to accomplish the objectives and scope of the inspection and to support any findings:

Section 71111.12 Maintenance Implementation

Corrective Action Documents

99-2894	03-8750	03-13957	03-15034	03-16917	03-18389
04-1173	04-1244	04-2545	04-3868	04-5206	04-8412
04-13787	04-15689	05-2092	05-2705		

Work Orders

425526

Procedures

Maintenance Rule Basis Document Guideline, Revision 10

Miscellaneous

2003 Annual Summary Report of Maintenance Rule Activities 2005 Annual Summary Report of Maintenance Rule Activities 0PGP04-ZA-0002, Revision 5, Maintenance Rule Structures Inspection Summary Report, 2003 STP UFSAR, 13.7, Risk-Informed Special Treatment Requirements

Section 2OS2: ALARA Planning and Controls (71121.02)

Corrective Action Documents

04-3635	04-3682	04-3878	04-3885	04-3941	04-3974
04-4171	04-12084	04-12772	04-14021	04-14552	05-53
05-1536	05-3216	05-3371	05-3445	05-3566	05-3698
05-3703	05-4164	05-5209	05-5674	05-7766	05-8179

Audits and Self-Assessments

LO-WLO-2005-0005-01 ALARA Planing and Controls and Access Control to Radiologically Significant Areas

QA-14-2005-WF-1 Radiation Protection

A-2 Attachment

Work Authorization Number Packages

6414	Steam Generator Secondary FOSAR Inspections
6416	Steam Generator Secondary Scaffolding and Insulation Support
275538	Reactor Head Disassembly and Reassessembly
275755	Steam Generator Secondary Water Lancing
276873	Nuclear Instrumentation Cable Repair
9071	Operations Support
9090	Radiation Protection Job Coverage

Procedures

0PRP07-ZR-0010	Radiation Work Permits, Revision 15		
0PRP07-ZR-0011	Radiological Work ALARA Reviews, Revision 5		
0PRP04-ZR-0015	Radiological Posting and Warning Devices, Revision 18		
0PGP03-ZR-0052	ALARA Program, Revision 8		
Conduct of Operations for Radiation Protection, Revision 6			

Miscellaneous Documents

Unit 1 Twelfth Refueling Outage, ALARA Report 2F0501 Outage Report, ALARA Report Formal Self-Assessment of the Radiation Protection Program, September 27-30, 2004

A-3 Attachment

LIST OF ACRONYMS

ALARA As Low As is Reasonably Achieved

Code of Federal Regulations condition report CFR

CR

SSC structure, system, and component

> A-4 Attachment