Tabular results from the Expanded Extent of Condition for CR 02-02202

ENVIRONMENTAL TABLE				
ITEM	**INSPECTION/ MAINTENANCE/ TESTING TYPE**	**GOVERNING DOCUMENT**	**TESTING/MAINTENANCE/REPAIR PROCESS**	**OUTSTANDING TESTING & MAINTENANCE PROCESS CORRECTIVE ACTION(S)**
Micropipets	Quality Control	1. C.M.-4.52 2. C.M.-9.10	1. Grease plunger 2. Replace instrument	
On-line pH Analyzers	Quality Control			
	Preventive Maintenance	1. C.M.-4.72A 2. C.M.-4.72B 3. C.M.-9.10A	1. Soak 20% ammonium bio-flouride soln. (1 minute) 2. Procedure 3. Replace electrode	
	Electronic	1. C.M.-4.72A 2. C.M.-4.72B 3. C.M.-9.10A	1. Procedure 2. Vendor Repair 3. Replacement instrument	
Dissolved Oxygen Analyzers (Portable)	Preventive Maintenance	1/2CHM-ANA-4.43C	Per Procedure	
	Calibration	1/2CHM-ANA-4.33	Saturated sponge	
CL-17 C12 Analyzer (Outfall 001)	Preventive Maintenance	C.M.-4.48E	Per Procedure	
	1 Mo. Maint.	C.M.-4.48E	Per Procedure	
	3 Mo. Maint.	C.M.-4.48E	Per Procedure	
	1 Yr. Maint	C.M.-4.48E	Per Procedure	
	Unscheduled	C.M.-4.48E	Per Procedure	
Balance	Quality Control	C.M.-9.10	Notify Chemistry Supervision	
	Preventive Maint.	C.M.-9.10	Notify MT&E program lead	
Thermometers	Calibration	MT & E Program	MT & E Program	

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Flow Meter	I&C Program	I&C Program	I&C Program	
Env. Panel	I&C Program	I&C Program	I&C Program	
ISCO 2700 Autosampler	Troubleshooting	C.M/4.75	Procedure includes a table that provides direction for routine maintenance. However two steps of the table refer the user to an apparently uncontrolled vendor manual.	03-04894 This Condition Report was written to revise the procedure and appropriately capture the vendor manual (if it is still needed). Supervisor Comments in the Condition Report require additional Corrective Actions to be written for the Environmental & Chemistry Section to evaluate whether other instrument procedures direct the user to an uncontrolled vendor manual, and to revise as necessary.

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Lab pH Meters	Preventive Maintenance	1. 1/2-CHM-ANA-4.191 2. C.M.-4.19C 3. C.M.-4.19E 4. C.M.-4.19F 5. C.M.-4.19G 6. C.M.-4.19H 7. C.M.-9.10	Replace electrode	
	Standardization	1. 1/2-CHM-ANA-4.19I 2. C.M.-4.19C 3. C.M.-4.19E 4. C.M.-4.19F 5. C.M.-4.19G 6. C.M.-4.19H 7. C.M.-9.10	1. Replace electrode 2. Purchase known standard	
	Quality Control	1. 1/2-CHM-ANA-4.19I 2. C.M.-4.19C 3. C.M.-4.19E 4. C.M.-4.19F 5. C.M.-4.19G 6. C.M.-4.19H 7. C.M.-9.10	1. Replace electrode 2. Purchase known standard	
	Electronic	1. 1/2-CHM-ANA-4.19I 2. C.M.-4.19C 3. C.M.-4.19E 4. C.M.-4.19F 5. C.M.-4.19G 6. C.M.-4.19H 7. C.M.-9.10	1. Vendor repair 2. Replace instrument	
	Temperature Compensator Check	C.M.-9.10	Check against MT&E (Thermometer)	
UV Spectrophotometers	Calibration Curve	1. C.M.-9.10 2. Per Analysis procedure	1. Complete new curve 2. Purchase new lot	
	Curve Check	1. C.M.-9.10 2. Per Analysis procedure	1. Complete new curve 2. Purchase new lot	

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	Quality Control	1. C.M.-9.10 2. Per Analysis procedure	1. Complete new curve 2. Purchase new lot	
	Performance	1. C.M.-9.10 2. C.M.-4.25 3. C.M.-4.25A 4. C.M.-4.25C 5. C.M.-4.24E 6. C.M.-4.81	Per Procedure	
	Preventive Maintenance	1. C.M.-9.10 2. C.M.-4.25 3. C.M.-4.25A 4. C.M.-4.25C 5. C.M.-4.24E 6. C.M.-4.81	1. Reagant grade water 2. Soft cloth	
Drying Ovens	Temperature Check	1. C.M.-4.46 2. 1/2-CHM-ANA-4.63	Replace	

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Other Analytical Devices: There are analyses beyond the capability of the BVPS Chemistry Laboratory. Generally, these analyses are performed by FENOC's Beta Laboratory-, ISO 9001 certified (ISO certification carries mandatory records management, procedures, and routine external audits). ***NOTE: In the case where Beta Laboratory cannot perform the required analysis, the services are procured from a qualified laboratory.***	Various used to analyze NPDES and regulated waste samples (e.g., EPA TCLP procedure for metals)	Various EPA standards and Beta Lab or contracted laboratory procedures. Contract laboratory must provide certification of qualification during the procurement process.	Per Beta or contractor programs.	

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Unit 1 and Unit 2 Sewage Treatment Plants	Operating parameters evaluated by Environmental & Chemistry sampling, and review by PA DEP Certified Operator. When certain parameters our found to be out of specification, chemical or mechanical adjustments are made. Physical Preventive Maintenance: There currently is no schedule for preventive maintenance on the STPs or equipment.	1-CHM-SAM-3.100H 1-CHM-ADD-7.1 2-CHM-SAM-3.80C 2-CHM-ADD-7.16	Neither plant has a preventive maintenance plan. Repairs and maintenance are performed when a condition is noticed, or when a component fails.	02-05301 For pH exceedance from the Unit 2 STP- Identified a need for an in-depth review of equipment and operating procedures was needed by an experienced and qualified engineering firm. • CA-05 was written to address that need, and is due 05/01/03/ 02-08413 For hold tank overflow due to failure of lift pumps at the Unit 2 STP, one corrective action was written to add surveillance steps to applicable procedures, and another was written to address previous ineffective corrective actions and address power supply to the related warning systems. • CA-02 Was written to add PM tour checks for the Unit 2 STP. The action was completed on 2/25/03. • CA-5 was written for engineering to track the development of a conceptual design to address the identified power problems and potential re-routing of influent. 03-00540 For a release due to a frozen valve, mistakenly thought to be closed, thawed and caused a release to the Stormwater system at Unit 2 STP- the lack of PMs or mechanical verifications were identified as issues. • CA-06 was written to add heat trace operability verification to the site winterization plan for both Unit 1 and Unit 2 STPs; due date is 4/21/03. • CA-07 was written to have the PA DEP certified operator review current operating procedures review procedures and identify components, items, or issues that need to be routinely maintained, inspected, or surveilled. Additional corrective actions are expected to result.

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Oil Tanks & Transformers	Annual Inspection	1/2-ADM-0602 (Basis: 40CFR 112 & 25 PA Code) Documented on 1/2-ADM-0602.F01	Per procedure step, a Work Request for minor work would be generated for any deficiency noted. Transformers and oil tanks fall under BVPS operations and maintenance programs. However, some of the oil tanks are further regulated by EPA and PA DEP- see additional requirements for them below.	
EPA & DEP Regulated Storage Tanks	Monthly Inspections	1/2-ADM-0602 (Basis: 25 PA Code) Documented on 1/2-ADM-0602.F02	Per procedure step, a Work Request for minor work would be generated for any deficiency noted. Any significant work on the tank, containment, or spill prevention must be contracted to a PA DEP Certified Tank Handler.	
	Operations Inspections (Underground tanks) and In-Service Inspections (Aboveground tanks)	25 PA Code	The Operations and In-Service inspections must be performed (contracted to) by a PA DEP Certified Tank Handlers. The due dates for the inspections vary with type (AST, UST), and installation date. The due dates are provided by the PA DEP on the annual storage tank registration certificates. BVPS tracks the requirements and due dates currently via Condition Report 02-09959*. The Corrective Actions include: 02-09959-17 (for UST) and 02-09959-22 (for AST). * Some environmental tasks were previously tracked in the CATS system. Those items were identified and captured in CR-02-09959 upon retirement of CATS. The FENOC Environmental Common Process team has agreed to use the Condition Report system (CREST) to continue task tracking until a final determination, throughout corporate FE, evaluates and provides guidance to perform the tracking elsewhere, e.g., SAP.	

Security Table

Area reviewed	Procedure describing	Acceptance Criteria?	Documentation?	Comments/CR
NRC Cornerstone Indicators	NEI Guidelines 99-02 rev2	yes	Yes- reviewed	Performed an overview of process. Documents were IAW standards and the documents were traceable and in proper storage as Sfgds Info. It is submitted to Reg Affairs and uses RAS-DR-011. RAS-DR-005 pg 25 of 31 is the "Protected Area Security Equip Performance Indicator". **No action required**
"Protected Area Security Equip Performance Indicator".	RAS-DR-005 Also ref Physical Sec Plan	Yes indicators Green- good White- bad	Yes- reviewed IDS comp hrs CCTV comp hrs	Reviewed with the Equipment Maintenance Coordinator (EMC). The EMC was very knowledgeable of the process and immediately produced all documentation requested. The records were stored IAW the guiding document (Non QA records) for a min of 3 yrs Any comp time is recorded in CAS along with the times and comp measures. They are reviewed by the EMC, tracked and stored via two different media. They are reviewed by the Mgr of Security then sent to Licensing for input to the PI plan. **Negative trend noted in 99 has reversed and has been green** **No action required**
Explosive Detectors	SP 5.1	yes	Yes- reviewed (vertical slice)	Reviewed procedure and documentation. PM is established IAW vendor recommendations.. No formal process exists for initiating a PM task other than review of operation by EMC or PAF post. Most times these are performed ahead of need to take equip OOS. Equip is designed as fail-safe. There are reporting requirements in the Sec plan and required notifications. Equipment is routinely monitored (rqmnts were reviewed but are sfgds info) **No action required**
Intrusion Detection Systems (IDS) Perifeld, E-field, microwave, CCTV	SP 6.2	yes	Yes- reviewed (vertical slice)	Reviewed procedure and documentation. Calibration procedures are developed via ADM. 90 day calibrations are performed. No formal PM. The cal has visual checks for obvious items to clean/repair. Equipment is routinely monitored (rqmnts were reviewed but are sfgds info) Cals are performed to screen out potential for equip to fall out of spec. Equip is Alarm/fail safe. Guidance is in place for comp measures. Every alarm, test, maintenance OOS is tracked in CAS along with the appropriate testing criterion. IDS (the perimeter) is the primary focus of Security. There are other systems that support security. This is the primary. **No action required**
Other equipment Doors, turnstiles barriers, gates etc.	PSP	yes	Yes- NOT reviewed	Other misc security equipment is in use at the plant and Owner controlled property. Those systems are" commercial systems" and a lot of new equipment has been recently purchased. All are in the PS Plan. **There are not any specific guidelines on this maintenance yet. No official training, spare parts recommendations or PM's. EMC or N/S supv gives limited tribal knowledge/guidance or a vendor is called. CR 03-05017** ***Recommendation that future use of SAP could be used to schedule repetitive tasks. Need for development of spare parts lists and establishment of document control of vendor manuals.***
"Commercial Process Eval "	DEER 0017	yes	Yes- reviewed	Design Exclusion Evaluation Request was approved 10/30/01 This has essentially evaluated the exclusion of the entire BVPS plant security system from the Design Control Program Concerns/risks. Over an extended period, when commercial changes are made to the system, control of the system's as built configuration must be steadfastly maintained or configuration control could be lost. DEER process is not clear that the owner holds similar responsibility for processes formerly performed under engineering process controls.

				Concern over prints, repair parts listing, doc controls and stocked items. See below. CR 03-05145 addresses this issue.
PO 7096886 for Perimeter upgrade			Yes-reviewed	**Concern over prints, maintenance PM's, repair parts listing, training and recommended spare parts listing. No driving document or hooks to do this when reviewing the P.O. CR 03-05017 addresses this issue.**
Condition reports	CR-992637		Yes-reviewed	**Untimely/inappropriate Corrective Actions. CR 03-05145 addresses this issue.**

Quality Assurance Verification Table

EXTENT OF CONDITION FOR 02-02202: NQA-INITIATED CRs FOR SELECTED PROGRAMS / RISK SIGNIFICANT SYSTEMS

	NQA AUDITS	AUDITING DATES	SCAQ [1,2] / CAQ [3,4] (CA or above) category CRs [FINDINGS]	VERIFICATION CAs COMPLETE
1	1997-Environmental	9/4-10/14/97	97-1578 (4), 97-1579 (4), 97-1580 (4), 97-1604 (4), 97-1605 (4)	Could not be verified through CREST
	1998-Environmental - nonradiological	3/12-5/11/98	98-1046 (4), 98-1047 (3), 98-1048 (4)	Could not be verified through CREST
	1998-Environmental	9/30-12/30/98	98-2096 (4), 98-2097 (4), 98-2110 (3), 98-2111 (4), 98-2116 (3), 98-2130 (4), 98-2144 (3), 98-2222 (4), 98-2223 (3)	Could not be verified through CREST
	1999-Environmental	9/8-10/27/99	99-2455 (4), 99-2468 (4), 99-2648 (4), 99-2652 (4), 99-2768 (4), 99-2847 (3), 99-2987 (4)	Verified by QA –by CREST Review
	2000-Environmental - nonradiological	4/12-5/30/00	00-1557 (3B), 00-1664 (3B), 00-1665 (3A), 00-1666 (3A), 00-1700 (3B), 00-1703 (3A), 00-1704 (3A), 00-1758 (3A), 00-1772 (3B)	Could not be verified through CREST Review
	2001-Environmental	10/16-10/29/01	No SCAQ or CAQ condition reports.	N/A
	2002-Environmental - nonradiological	4/1-4/30/02	02-02958 (CA), 02-02962 (CA), 02-02967 (CA), 02-03027 (SB), 02-03118 (CA), 02-03271 (CB), 02-03326 (CB), 02-03327 (CA), 02-03339 (CA)	Verified through CREST Review
2	1997-EPP	2/4-4/9/97	97-0711 (3), 97-0712 (3), 97-0713 (3), 97-0714 (3), 97-0715 (3), 97-0716 (3), 97-0403 (4), 97-0717 (3), 97-0718 (3), 97-0719 (3), 97-0720 (3), 97-0721 (4), 97-0722 (4), 97-0723 (3)	Could not be verified through CREST Review
	1998-EPP	1/29-3/20/98	98-0707 (3), 98-0708 (4), 98-0709 (4), 98-0706 (4), 98-0480 (4), 98-0481 (4)	Could not be verified through CREST Review
	1999-EPP	1/22-3/18/99	99-0848 (4), 99-0849 (4), 99-0847 (4), 99-0784 (4), 99-0779 (4), 99-0280 (4)	99-0847 and 99-0079 could not be verified through CREST
	2000-EPP	2/2-3/3/00	00-0612 (2), 00-0613 (2), 00-0614 (3A), 00-0615 (3B), 00-0616 (3B), 00-0617 (3B), 00-0618 (3B), 00-0633 (3A), 00-0716 (3C), 00-0798 (3A), 00-0799 (3C)	00-0612 could not be verified through CREST
	2001-EPP	1/15-2/23/01	01-0380 (CA), 01-0557 (CA) Not marked for QA follow-up	Could not be determined from CREST review
	2002-EPP	1/7-1/31/02	No SCAQ or CAQ condition reports.	N/A
3	1997-Security	1/29-3/18/97	97-0405 (3), 97-0475 (3), 97-0476 (4), 97-0526 (4)	Could not be verified through CREST
	1998-Security	2/3-3/12/98	98-0201 (4), 98-0470 (4), 98-0509 (4)	Could not be Verified through CREST
	1998-Security and Access Authorization	2/3-3/12/98	No SCAQ or CAQ condition reports.	N/A
	1999-Security	1/28-3/16/99	No SCAQ or CAQ condition reports.	N/A
	2000-Security and Access Authorization	1/31-3/15/00	00-0160 (3B), 00-0251 (3A), 00-0320 (3B), 00-0491 (3C), 00-0492 (3A)	
	2001-Security	1/24-3/16/01	01-0708 (CA)	
	2002-Security and Access Authorization	1/14-2/1/02, 3/1-3/28/02	No SCAQ or CAQ condition reports.	
4	2nd Qtr 2002 NQA Assessment	5/13-6/30/02	FIRE PROTECTION SYSTEM: 02-04777 (CB), 02-04779 (CA), 02-04780 (CR), 02-04443 (CA), 02-	No QA follow-up on CR 02-04777,

	Report		04445 (SB), 02-04629 (CB), 02-05375 (CB)	as listed in the CREST database. [1] CAs of all other listed CRs either verified, rejected. or are "Open" [2]
5	3rd Qtr 2002 NQA Assessment Report	7/1-9/30/02	FIRE PROTECTION SYSTEM: 02-04778 (CA), 02-04779 (CA), 02-05983 (CB), 02-06162 (CB)	No QA follow-up on CR 02-04778, as listed in the CREST database. [1] No QA follow-up on automatic closure (W.O.) for CA 02-05983-02 [3] CAs of all other listed CRs verified or are "Open"
6	4th Qtr 2002 NQA Assessment Report	9/30-12/31/02	BORIC ACID PROGRAM: CR 02-10228 (CA), 02-10342 (CA)	CAs of listed CRs verified, "Hold" or are "Open"
7	ORP00205a: Clearance / Tagging	4/1/02-4/1/03	CLEARANCE PROGRAM Element: 15 QFOs generated by NQA. CR 02-07889 (NA), CR 02-08560 (CA)	No QA follow-up on CR 02-08560. Investigation not QA approved. CAs NOT verified. [3] CAs of listed CRs verified or are "Open"
8	EEN00418: Boric Acid Corrosion Control	4/1/02-4/1/03	BORIC ACID Element: 8 QFOs generated by NQA. No CRs were generated as CA or above category/evaluation.	N/A
9	OOP00104: Reactivity Management	4/1/02-4/1/03	REACTIVITY MANAGEMENT Element: 3 QFOs generated by NQA. No CRs were generated as CA or above category/evaluation.	N/A

Issues that could not be verified through CREST Review will be addressed by CR 03-04788.