



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

August 14, 2006

Docket Nos. 05000387
05000388
07200028 (ISFSI)

License Nos. NPF-14
NPF-22

Britt T McKinney
Senior Vice President and Chief Nuclear Officer
PPL Susquehanna
769 Salem Boulevard - NUCSB3
Berwick, PA 18603-0467

SUBJECT: PPL, SUSQUEHANNA GENERATING STATION, NRC INSPECTION REPORTS
05000387/2006008 AND 05000388/2006008, BERWICK, PENNSYLVANIA SITE

Dear Mr. McKinney:

On July 12, 2006, the United States Nuclear Regulatory Commission (NRC) completed an inspection at the above address of activities authorized by the above listed NRC licenses. The inspection was an examination of your licensed activities as they relate to the operation and surveillance of the Independent Spent Fuel Storage Installation (ISFSI) and to compliance with the associated Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selected examination of representative records. The findings of the inspection were discussed with you and members of your staff on June 21, 2006, and on July 12, 2006, with Messrs. Karchner and Brophy at the conclusion of the onsite inspection.

Within the scope of this inspection, no violations 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 available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Marie Miller, Chief
Decommissioning Branch
Division of Nuclear Materials Safety

B. McKinney

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Enclosure:

Inspection Reports 05000387/2006008 and 05000388/2006008
w/Attachment: Supplemental Information

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REGION I

INSPECTION REPORT

Inspection No. 05000387/2006008
05000388/2006008

Docket No. 05000387
05000388
07200028 (ISFSI)

License No. NPF-14
NPF-22

Licensee: PPL Susquehanna, LLC

Location: 769 Salem Boulevard - NUCSB3
Berwick, PA 18603-0467

Inspection Dates: June 12, 2006 through July 12, 2006

Inspectors: Marjorie McLaughlin, Health Physicist
Robert Prince, Health Physicist

Approved By: Marie Miller, Chief
Decommissioning Branch
Division of Nuclear Materials Safety

EXECUTIVE SUMMARY

PPL, Susquehanna, LLC
NRC Inspection Report No. 05000387/2006008 and 05000388/2006008

The inspection consisted of evaluating independent spent fuel storage installation (ISFSI) activities including characterization of selected fuel assemblies for storage, procedures and documentation, handling and movement of heavy loads, review of personnel training and qualifications, facilities and equipment, and evaluations associated with the most recent ISFSI fuel loading campaign. The inspection also reviewed the licensee's corrective actions regarding dry fuel storage (DFS) activities. The inspection consisted of interviews with cognizant personnel, review of licensee documentation, and field observations.

The licensee developed a cask loading plan in accordance with approved procedures. Licensee documentation supported the proper characterization of fuel assemblies loaded into dry storage canister (DSC) 39. Licensee programs were adequate to ensure that fuel assembly parameters for fuel assemblies selected for loading were in compliance with the Certificate of Compliance (CoC) requirements.

The licensee safely loaded a DSC in accordance with approved procedures and the requirements of Technical Specifications (TS). The DSC was properly sealed, tested, surveyed and inspected, and met the requirements of the CoC. Handling and transport of the loaded cask was performed in accordance with approved procedures and the DSC safely placed into a horizontal storage module at the ISFSI facility. Routine surveillances of the ISFSI facility were performed in accordance with TS requirements.

The licensee effectively used the established corrective action program to self-identify and address issues relating to DFS activities. Oversight activities provided effective independent review of DFS activities. Conditions associated with an exemption request were adequately evaluated and incorporated into licensee programs and procedures. Continued efforts are required to ensure that DFS pre-requisite activities, such as readiness of equipment, procedures, and training activities, are complete sufficiently far in advance of scheduled DFS campaigns to support the safe storage of spent fuel at the ISFSI.

Individuals were properly trained and qualified to perform their assigned functions. Efforts are needed to resolve licensee identified training issues and to address inconsistencies between the intent of certain training procedure requirements and established field practices.

REPORT DETAILS

I. Fuel Characterization and Verification

a. Inspection Scope

The Certificate of Compliance (CoC) for the NUHOMS-61BT dry cask storage system specifies the parameters that must be met in order to allow spent fuel to be stored at the Independent Spent Fuel Storage Installation (ISFSI). The inspector evaluated the licensee's integrated programs to verify that spent fuel assemblies selected for storage met the requirements of the CoC. The inspection consisted of interviews with cognizant personnel, field observations of fuel activities in the reactor building, and review of licensee procedures and documentation related to loading fuel into dry storage canister number 39 (DSC-39).

b. Observations and Findings

Cognizant personnel were knowledgeable of the Technical Specification (TS) requirements associated with fuel characterization. The inspector noted that the selected fuel assemblies were adequately characterized and met all the appropriate TS requirements for placement into DSC-39.

The inspector noted that individuals on the refueling bridge verified that the designated fuel assembly was selected and placed in the assigned storage location in the dry storage canister (DSC). The inspector observed that peer checking and independent verification processes were utilized to confirm that designated fuel assemblies were loaded per the DSC loading plan. The inspector independently reviewed the video of the final fuel verification for DSC-39. The inspector noted that the loaded fuel assemblies were properly orientated and that all fuel assemblies were placed in their designated locations in the DSC in accordance with the loading plan and approved procedures.

The licensee requested an exemption from 10 CFR Part 72.212 and 10 CFR Part 72.214 to allow placement of Framatome ANP 9x9-2 spent fuel assemblies into dry storage during this fuel loading campaign. The exemption request was approved and subject to various conditions including a limit on the decay heat output per fuel assembly and a requirement that fuel assemblies meet specified design parameters. The inspector determined that requirements associated with the exemption request were appropriately incorporated in procedure RE-081-043, Selection and Monitoring of Fuel for Dry Storage, Revision 2. The inspector confirmed that fuel assemblies selected for loading during the 2006 campaign met the requirements of the exemption request including fuel design and the maximum decay heat level per fuel assembly. This item is discussed further in Section III of this report. No safety concerns were identified.

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c. Conclusions

The licensee developed a cask loading plan in accordance with approved procedures. Licensee documentation supported the proper characterization of fuel assemblies loaded into DSC-39. Licensee programs were adequate to ensure that fuel assembly parameters for fuel assemblies selected for loading were in compliance with CoC requirements.

II. DSC Preparation, Cask Handling and Loading and ISFSI Operations

a. Inspection Scope

The inspector observed activities associated with the preparation and placement of DSC-39 into a horizontal storage module (HSM) at the ISFSI. The inspector reviewed the work package associated with the loading and preparation of DSC-39. Observation of field activities included portions of the vacuum drying process, helium backfilling and movement of the cask from the cask storage pit (CSP) to the decontamination and preparation area, and subsequent placement of the loaded cask onto the transfer trailer (TT). The inspection consisted of field observations, interviews with cognizant personnel and review of licensee documentation, including review of the Operator daily ISFSI routine surveillances for a two week period and cask TS.

b. Observations and Findings

Movement of the cask from the CSP to the decontamination and cask preparation area on the refuel floor was performed in accordance with approved procedures in a safe and controlled manner. Decontamination activities and contamination control measures were adequately implemented. Radiation surveys were performed throughout the evolution to confirm that dose rates were within prescribed limits to allow handling and storage of the DSC at the ISFSI. The inspector noted good communication between the crane operator and members of the work crew during movement of the cask. Licensee personnel stated that rigging equipment utilized for dry fuel storage (DFS) activities were inspected and approved for use prior to the start of the current campaign.

The inspector noted that an individual was stationed in the control point office. This individual was in constant communication via headset with individuals on the refuel floor and communicated work package steps to responsible individuals during the performance of work activities. The inspector noted the use of three-way communication, repeat backs, and self-checking techniques to ensure that procedural steps were properly executed. The person was knowledgeable of his responsibilities.

The inspector found that TS requirements were met and verification steps associated with such activities as vacuum drying criteria, non-destructive testing of the DSC cover welds, and the performance of the helium leak test were properly completed.

During placement on the TT in the reactor building truck bay and transport of the loaded cask to the ISFSI facility and alignment of the transfer trailer to a HSM, all transfers

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were performed in a controlled manner. The inspector noted that appropriate escort personnel were provided and present during the movement of the TT from the reactor building to the ISFSI facility. Control Room and Security personnel were notified prior to the movement of the cask from the reactor building in accordance with approved procedures.

Prior to the inspection, the licensee had experienced difficulty in aligning the TT with a selected HSM without placing excessive stress on the TT suspension system. This was due in part to the limited amount of space available to maneuver the transfer trailer between adjacent rows of HSMs. Damage to the TT suspension system was also experienced during the current campaign. During the time of the onsite inspection the licensee was still evaluating the situation and had developed and implemented corrective actions based upon lessons learned. The inspector noted that these corrective actions were employed during the loading of DSC-39.

The alignment of DSC-39 was performed in a deliberate and controlled manner. The inspector observed personnel prescribe markings on the ISFSI pad, adjacent to the HSM to be loaded, to assist aligning the TT with the HSM. Measures were implemented to observe stress and performance attributes of the TT suspension system while maneuvering the TT into position with the HSM. One of the immediate corrective actions was to use the TT vertical jacks to raise the TT off the ground, reposition the TT wheels and then lower the TT. This step reduces the high stress levels placed on the TT suspension during the final alignment movements. During this stage the TT is essentially stationary while attempting to turn the wheels when making the final alignment of the TT with the HSM. The inspector noted that the wheels of the TT were rotated easier into the desired position with the TT lifted on the vertical jacks. A visual inspection of the TT suspension system performed upon completion of the DSC loading did not identify any issues with the suspension system. Licensee personnel stated that visual inspections of the TT suspension system will be performed after future loading operations in an attempt to identify the cause of any damage that may be experienced.

The inspector interviewed cognizant personnel concerning fire loading limitations for the ISFSI area and limitations on the number of vehicles that may be allowed inside the ISFSI perimeter fence. Personnel were knowledgeable of the technical specification combustible loading limitations and the need to restrict vehicles from the ISFSI when workers are not present. The inspector confirmed that vehicles and equipment representing potential fire loading concerns, were removed from the ISFSI facility upon completion of work activities, when the facility was not occupied. No safety concerns were identified.

Operator surveillances include visual inspection of the ISFSI facility and HSMs and confirmation that temperature levels of loaded HSMs are within specified limits. No deviations or concerns were noted on the surveillance data sheets reviewed by the inspector. The inspector noted that appropriate postings were located at the entrances and along the perimeter ISFSI fence. Dosimetry stations were located at various locations along the perimeter fence. Appropriate radiological sign postings were verified to be present on loaded HSMs. Radiological surveys of recently loaded HSMs and

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radiological surveys of the ISFSI facility were reviewed. The inspector noted that dose rates on the transfer cask and loaded HSMs met technical specification requirements. A visual inspection of the heavy haul path did not identify any problems relating to the material condition of the road surface.

c. Conclusions

The licensee safely loaded a DSC in accordance with approved procedures and the requirements of TS. The DSC was properly sealed, tested, surveyed and inspected, and met the requirements of the CoC. Handling and transport of the loaded cask was performed in accordance with approved procedures and the DSC safely placed into an HSM at the ISFSI facility. Routine surveillances of the ISFSI facility were performed in accordance with TS.

III. Self-Assessment, Evaluations and Corrective Actions

a. Inspection Scope

The involvement of oversight functions and independent reviews of DFS activities was evaluated to ensure that the DFS program was being assessed by the licensee to support safe operation of the ISFSI facility. Condition reports related to DFS activities, issued since the last ISFSI inspection through June 2006, were reviewed for safety-related issues and for the identification of any adverse trends or generic concerns, and to evaluate the licensee's effectiveness in identifying appropriate corrective actions and the implementation of those corrective actions. The inspector evaluated the most recent revision of the 10 CFR Part 72.212 report and 10 CFR Part 72.48 screening evaluations associated with recent amendments to CoC 1004. The inspection consisted of field observations, interviews with cognizant personnel, and review of licensee documentation.

b. Observations and Findings

The threshold for the identification of safety-related issues was adequate. The inspector discussed the status and closure of selected corrective actions with cognizant personnel. The inspector noted that Action Requests (ARs) related to DFS readiness preparations were also entered into the licensee's corrective action program. Several training-related condition reports were recently generated associated with DFS 2006 training activities, as further discussed in Section IV of this report.

Oversight of DFS activities was provided by the Quality Assurance (QA) staff. QA performed an assessment covering the first cask loading of the 2006 campaign. Assessment results were summarized in the May 2006 Snapshot - Dry Fuel Storage Activities. The report was comprehensive and covered key aspects of DFS activities. Issues and recommendations were identified and presented to responsible project team members. Assessment findings were identified and entered into the corrective action program as appropriate. Independent surveillances were also performed by the QA

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staff of DFS activities and selected surveillances reviewed by the inspector. No safety concerns were identified by the licensee's independent oversight programs.

The inspector, however, noted an issue relating to the adequacy of pre-operational readiness activities. Even though no safety concerns were identified the prevalence of multiple observations indicate the need to improve pre-operational efforts. The inspector found that AR's were initiated for such items as the need for work group managers to document critical actions to support scheduled DFS campaigns, that personnel involved with DFS activities not be scheduled for non-related training during scheduled campaign periods, and that any necessary procedures or related work documents be revised prior to the initiation of training or in advance of the scheduled campaign start date. Daily log sheets identified several examples of issues relating to the staging and availability of sufficient quantities of supplies and materials, or issues concerning the operational status of some equipment. The May 2006 Snapshot report and the DFS Project 2005 final report identified similar issues. In addition, the May 2006 Snapshot report highlighted other pre-operational concerns relating to the late completion date of training and late procedure changes. Though none of these items individually, posed a safety concern, the multiple examples indicate the need to ensure that adequate DFS campaign pre-operational activities are completed in a timely manner to ensure the continued successful execution of these activities. This observation was discussed with licensee management and DFS project personnel who acknowledged the inspector's observation.

To allow placement of a fuel design not previously approved for storage in the NUHOMS-61BT storage system during the 2006 fuel campaign, the licensee requested an exemption. The exemption request was approved by the NRC subject to various conditions. The inspector determined that the 10 CFR Part 72.212 Evaluation Report was revised to support the exemption request as well as changes associated with amendments 5, 6, 7, and 8 to CoC 1004.

c. Conclusions

The licensee effectively used the established corrective action program to self-identify and address issues relating to DFS activities. Oversight activities provided effective independent review of DFS activities. Conditions associated with an exemption request were adequately evaluated and incorporated into licensee programs and procedures. Continued efforts are required to ensure that DFS pre-requisite activities such as readiness of equipment, procedures, and training activities are complete sufficiently far in advance of scheduled DFS campaigns to support the safe storage of spent fuel at the ISFSI.

IV. Training and Qualifications

a. Inspection Scope

The licensee's training program was reviewed to verify that the TS and related training requirements were incorporated into the DFS training program and that personnel were

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qualified to perform DFS-related activities. The inspector interviewed cognizant training and DFS personnel regarding training and qualification of personnel performing DFS activities. The inspection also consisted of a review of training program procedures, training and qualification records, and field observations. Recent Condition Reports and the Action Requests related to potential training concerns were also evaluated.

b. Observations and Findings

The inspector noted that training consisted of general overview classroom sessions, task-specific training and field sessions involving the use of equipment. To be fully qualified to perform a given DSC task independently, an individual would have to successfully complete the appropriate on-the-job (OJT) training and task performance evaluation (TPE) requirements. The inspector reviewed selected OJT/TPE qualification packages and noted that required documentation was available that demonstrated that individuals had successfully completed DFS required training. The inspector verified by interviews and records that a previously experienced DFS individual, who was a licensee employee, presented the classroom training and completed the vast majority of the OJT and TPE sessions. The inspector confirmed that the training instructor was qualified in accordance with the licensee's instructor training and qualification program and that individuals were assigned DFS tasks in accordance with their qualification status. The inspector also observed that there was adequate staffing levels of qualified individuals during loading sequences.

During one loading sequence, the licensee had identified a condition where one transfer cask was incorrectly rotated by 90 degrees from the correct orientation with the DSC. The issue was included in the licensee's corrective action program as AR No.779328. The inspector evaluated this condition to determine if the problem was related to training or another cause. The inspector determined this occurred on one occasion during the fuel loading campaign, and the incorrect placement of the transfer cask was identified in a subsequent procedure step that required verification of its placement before fuel was loaded. The inspector determined the cask orientation was an isolated occurrence and not related to the training of personnel supporting the DFS activities.

The Susquehanna DFS work crew was supplemented with additional Field Services personnel for the 2006 fuel campaign. The assignment of these individuals resulted in a composite of individuals with varying degrees of experience attending the 2006 DFS training sessions. The inspector noted that the licensee had self-identified several training-related issues leading up to the fuel campaign. These issues were entered into the licensee's corrective action program. The identified training issues included such items as suggestions to enhance classroom training sessions, the need to ensure that the appropriate level of training is provided based on an individual's experience and knowledge level, and ensuring that training materials were maintained current. The inspector determined that enhancements to the DFS training program and related training materials would improve the effectiveness of DFS training activities.

Additionally, the inspector determined that the licensee should evaluate DFS training activities to ensure that all aspects of the training program are conducted in accordance

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with training program objectives. In general, the inspector found that the training program guidance lack specific requirements. The inspector noted several examples as follows:

- Training was completed by using one individual to perform all but one of the OJT and TPE sessions for the 2006 training. Procedure NTP-QA-11.3, Section 6, guidance states these steps are “typically performed by different individuals.”
- Licensee personnel stated that individuals who have completed OJT/TPE are expected to participate in an actual task-specific field activity under the guidance of an experienced individual prior to independently performing the task. However, procedure NTP-QA-11.3, Section 6.13.8.1, states that successful completion of TPE “certifies the individual to perform the task independently.” Cognizant licensee personnel stated that the site qualification matrix is what’s used to determine which personnel are qualified to perform specific field activities independently (e.g., such as vacuum drying).
- The TPE Evaluator Qualification form, Attachment 8 of procedure NTP-QA-11.3, has a requirement to verify that the TPE Evaluator is technically qualified by education, training and experience to perform TPE Evaluator functions. This verification is signified as being complete by a sign-off step. In one case the inspector noted that this verification sign-off was completed for a contractor individual simply by observing the individual assisting in the TPE performance of a DFS specific task, for which the individual possessed limited knowledge, and had no previous work experience in the task area. The contractor was considered a TPE evaluator in accordance with the site-wide training program. However, because of the lack of experience in most of the DFS specific tasks, the licensee had a more knowledgeable, TPE-qualified, licensee employee also observe this contractor’s OJE and TPE evaluations.
- Section 6.18 of the same procedure also stated that periodic evaluations of OJT programs will be performed by line supervision. Based on discussions with licensee personnel it was determined that no evaluation was performed for the 2006 DFS training sessions. The inspector again noted the frequency of this type of evaluation was not specifically defined.

These examples are not procedural compliance issues, because the training procedures provide flexibility, which causes various interpretations of the requirements of the training program. Nevertheless, the inspector concluded that actual practices relating to DFS-training activities should be reconciled with procedural requirements. The inspector noted that licensee personnel acknowledged this assessment. The inspector noted that in all cases individuals assigned DFS activities during the current campaign were qualified in accordance with the licensees training program.

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c. Conclusions

Individuals were properly trained and qualified to perform their assigned functions. Efforts are needed to resolve licensee identified training issues and to address inconsistencies between the intent of certain statements in training procedures and established field practices.

V. Exit Meeting

The inspector presented the inspection results to you and members of your staff at the conclusion of the inspection on June 21, 2006. On July 12, 2006 the inspector presented the results of the one-day follow-up inspection associated with open items discussed during the June 21 exit meeting to Duane Karchner and Dayne Brophy.

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SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

*Mike Baghman, Nuclear Training
Jim Basore, Training
*Dominic D'Angelo, Manager - Station Engineering
**Dayne Brophy
*Steven Cook, Quality Assurance Manager
*Mike Crowthers, Acting Manager - Nuclear Regulatory Affairs
*Jim Doxsey, Manager, Special Projects (ISFSI)
John Emmett
*Jeffrey Griswood
Jeff Haedrich, Production Supervisor
**Duane Karchner, Refuel Floor Manager, Maintenance
Kevin Kelenski
Jim Lex, Nuclear Maintenance Training Supervisor
Jim Long, Nuclear Maintenance
*Charles Madara, Health Physicist
Lester Markle, Field Services
*Britt McKinney, Chief Nuclear Officer
Justin Mirliovich, Engineer
*W.E. Morrissey, Supervisor, Nuclear Regulatory Affairs
*D. Murphy, Health Physics Leader - HP
John Novak, Senior Engineer
Brenda O'Rourke, Senior Engineer, Nuclear Regulatory Affairs
Robin Rodriguez-Gilray, Health Physics Foreman
Bob Sacco, Manager Field Services/Maintenance
R. A. Saccone, Vice President - Nuclear Operations
*Vince Schuman, Manager, Radiation Protection
*Rocky Sgarro, Acting General Manager - PI&O
*D. T. Walsh, Operations
Dave Wright, Production Supervisor

*Denotes attendance at the June 21, 2006 exit meeting.

**Denotes attendance at the July 12, 2006 exit meeting.

DOCUMENTS REVIEWED

Susquehanna Steam Electric Station Spent Fuel Storage Project 10 CFR 72.212
Evaluation, Revision 3

Shift Logs, Dry Fuel Storage - Daily Status Reports (for loading of DSC's number 37 and 38)

RE-081-043, Rev 2, Selection and Monitoring of Fuel for Dry Storage

ME-ORF-023, Rev 6, Dry Fuel Storage - 61BT Dry Shielded Canister

MM147, Dry Fuel Storage Overview

NTP-QA-40.1, Maintenance Training and Qualification Program

NTP-QA-11.3, On-The-Job Training

Work Order 544972, Loading of DSC Number 37

QCIR-779560, Dry Fuel Storage Surveillance

QCIR-784406, Surveillance Activity for Dry Fuel Storage Cask #38

QCIR-786639, Walk-Up Inspection - 818 DFS Canister #39

AR 749859, May 2006 Snapshot - Dry Fuel Storage Activities

2005 - Susquehanna LLC Dry Fuel Storage Project, Final Report

551QP - Dry Fuel Storage Crew Qualification Matrix

Condition Reports Related to DFS Activities for 2006 Campaign

LIST OF ACRONYMS USED

AR	Action Request
CoC	Certificate of Compliance
CSP	Cask Storage Pit
CST	Cask Storage Pit
DFS	Dry Fuel Storage
DSC	Dry Storage Canister
HSM	Horizontal Storage Module
ISFSI	Independent Spent Fuel Storage Installation
NUHOMS	Nuclear Horizontal Modular Storage
OJT	On-The-Job Training
QA	Quality Assurance
TPE	Task Performance Evaluation
TS	Technical Specifications
TT	Transfer Trailer