

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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AUTH. NAME AUTHOR AFFILIATION  
 PARKER, T.M. Northern States Power Co.  
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MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License DPR-22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Docket Nos. 50-282 License Nos. DPR-42  
50-306 DPR-60

Configuration Management Program Six Month Status Report

In our letter dated November 13, 1989, and at a meeting with the NRC on December 14, 1989, NSP agreed to provide semi-annual status reports to the NRC on the progress of the Configuration Management Programs at Monticello and Prairie Island. This letter, and attachments, provides our status through December 31, 1990.

Safety System Functional Inspections (SSFIs) were recently completed at both Monticello and Prairie Island. The SSFI at Monticello was performed by NRC Region III inspectors as an Electrical Distribution System Functional Inspection (EDSFI). Prairie Island utilized an outside contractor to perform an SSFI on the Safety Injection System. Results from these inspections were compared to Design Bases Document (DBD) verification activities (see Attachments 2 and 4) on the same systems (125 VDC and 250 VDC Systems for Monticello and Safety Injection System for Prairie Island). The comparison showed, for both sites, that the NSP Verification Program achieved the objectives of the SSFI, i.e., the systems will function consistent with their design requirements. Because the same results were obtained and because verification is an integral part of the NSP Configuration Management (CM) Program, NSP will continue the DBD Verification program activities to confirm proper implementation of design bases at both Monticello and Prairie Island.

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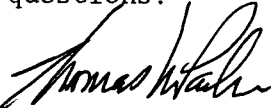
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Please contact us if you have any questions concerning this report. Mr. Craig Schibonski (Monticello Design Standards Superintendent) at (612) 295-1427 or Mr. Ben Stephens (Prairie Island Design Standards Superintendent) at (612) 338-1121 Ext. 4172 may be contacted directly regarding plant specific questions.



Thomas M Parker

Manager

Nuclear Support Services

c: Regional Administrator, Region III  
NRR Monticello Project Manager, NRC  
Monticello Sr Resident Inspector, NRC  
NRR Prairie Island Project Manager, NRC  
Prairie Island Sr Resident Inspector, NRC  
T. Martin, NRC  
M. Phillips, NRC  
I. Yin, NRC

Attachments: Attachment 1, Monticello CM Program Status as of December 31, 1990

Attachment 2, Comparison Between NRC EDSFI and Monticello DBD Verification Results

Attachment 3, Prairie Island CM Program Status as of December 31, 1990

Attachment 4, Comparison Between Prairie Island SSFI and DBD Verification Results

ATTACHMENT 1

MONTICELLO CM PROGRAM STATUS  
AS OF DECEMBER 31, 1990

Target milestones to be completed by December 31, 1990 as identified in the NSP/NRC meeting of December 14, 1989.

<u>Milestone</u>	<u>Status</u>
1. Procedures and Writer's Guides revision following pilot effort.	1. Complete.
2. Completion of 8-12 DBDs on plant systems, structures, and topics.	2. 4 DBDs completed and verified, will be issued by February 1991.  2 DBDs undergoing final review and verification to be issued by March 31, 1991.  11 additional DBDs undergoing preparation.
3. Completion of bulk source document retrieval and indexing for DBDs.	3. Completed for 26 DBDs. In progress for remaining DBDs.
4. Initiate drawing update program.	4. Not initiated.
5. Initiate development of Piping Design Standard.	5. Draft prepared and reviewed, undergoing final review.
6. Completion of one SSFI to validate the DBD Verification Process.	6. Comparison between NRC EDSFI and DC System DBD Verifications included in Attachment 2.

Note: NRC Region III EDSFI at Monticello required 3000 manhours of direct support by selected CM/DBD personnel in response and follow-up to NRC requests. The support of this unplanned event impacted 1990 DBD development goals.

ATTACHMENT 1  
(Continued)

Target milestones to be completed by December 31, 1991:

1. Complete 8-12 Design Bases Documents in addition to the 4 completed in 1990.
2. Initiate Design Standards Section input and review into the NSP modification process.
3. Establish a means to prioritize Configuration Management improvement activities to ensure that the highest safety importance items are worked on first.
4. Initiate drawing update program.

Status of the Follow-On Item (FOI) Program:

1. 137 FOIs identified as of January 15, 1991.
2. Two Licensee Event Reports (LERs) resulting from FOI review:
  - a. Revision 1 to LER 89-040, Failure to Meet Secondary Containment Performance Requirements Due to Design Deficiencies, dated November 13, 1990.
  - b. LER 90-019, Potential for Loss of Fuel Oil Transfer Capability During External Flood Due to Procedural Inadequacy, dated December 26, 1990.

## ATTACHMENT 2

### COMPARISON BETWEEN NRC EDSFI AND MONTICELLO DBD VERIFICATION RESULTS

#### 1.0 INTRODUCTION

This attachment compares the results of the Electrical Distribution System Functional Inspection (EDSFI) conducted by the NRC during October and November of 1990 to the DBD verification activities which were completed on the 125 and 250 VDC Systems during November and December 1990.

The 125 and 250 VDC DBD Verifications covered only the battery systems whereas the EDSFI covered the following electrical areas/systems:

- Batteries, chargers, inverters and switchgear
- AC distribution systems for 4160, 480 VAC
- Emergency Diesel Generator and support systems
- Electrical Maintenance and documentation
- Administrative Controls related to the electrical systems
- Modifications, Testing and Surveillances

#### 2.0 RESULTS

A finding-by-finding comparison (See Table 1 to this attachment) between the EDSFI and DC System Verification results was performed. It should be noted that not all the findings of the EDSFI can be directly correlated since the EDSFI was much broader in scope, i.e., it included AC distribution and mechanical support systems and some topical areas such as electrical coordination. These systems and topical areas will be verified by Monticello as part of other DBD development efforts not yet started. Although the 125 VDC & 250 VDC DBD verification activities were conducted shortly after the EDSFI, they were completed independent of the EDSFI and its results.

Problems identified by both inspections can be characterized as follows:

- Design documentation weaknesses,
- Inconsistencies between plant documents,
- Missing component level safety classification and/or qualification information,
- Not yet implemented Operating Experience Assessment (OEA) recommendations,
- As-built versus drawing discrepancies,
- Incomplete bases for some setpoints,
- Missing or incomplete evaluations documenting the bases for excluding some vendor recommendations from plant procedures, and

ATTACHMENT 2  
(Continued)

- Administrative procedures which do not effectively address certain processes such as trending and bypass control.

3.0 CONCLUSION:

The NRC EDSFI and NSP DBD verifications are both in-depth inspections with an identical objective, i.e., assess the operational readiness of safety systems. Findings and observations were identified by both inspections in all areas as characterized above. Similar high safety significance issues were identified by both inspections in areas of identical scope. Both inspections reached the same conclusion; the DC Systems are of sound design and perform their intended safety function.

ATTACHMENT 2

TABLE 1

SUMMARY OF EDSFI FINDINGS VERSUS DBD VERIFICATION FINDINGS

<u>DC SYSTEMS RELATED EDSFI FINDINGS</u>	<u>ASSOCIATED DBD VERIFICATION FINDINGS</u>	<u>FOI NUMBER(S)</u>
1. 250 VDC Battery sizing and load profile concerns (Closed prior to NRC exit - EDSFI Report, Sections 2.2.1 and 2.2.2).	DBD Verification identified battery sizing and load profile concerns similar to EDSFI.	90-0097 91-0019 91-0020
2. 250 VDC System Main Fuse Coordination Concern (Weakness - listed in NRC EDSFI report, Section 2.2.3).	Fuse coordination to be addressed in a Topical DBD, however it was noted in a FOI that short circuit rating for 250 VDC system panel fuse and distribution panels could not be located.	91-0006
3. One of the 250 VDC battery short circuit calculations was not done at the most conservative temperature (Closed prior to NRC exit - EDSFI Report, Section 2.2.4).	FOI issued, approved calculation was not available for use by verification team to address room temperature effects on short circuit calculations.	91-0057
4. Concern with not using 100% rating of UPS for determining load profiles for 125 VDC batteries (Closed prior to NRC exit - EDSFI Report, Section 2.2.5).	Minimum acceptable voltages for loads are addressed in respective System DBDs, not DC System DBDs.	None
5. Voltage drop across EDG field flash cables not properly considered in voltage drop calculation (Closed prior to NRC exit - EDSFI Report, Section 2.2.6).	Minimum acceptable voltages for loads are addressed in respective System DBDs, not DC System DBDs.	None
6. Low input voltage (DC) to UPS Inverters after 4 hours (Closed prior to NRC exit - EDSFI Report, Section 2.2.7).	FOI issued on four hour battery capacity.	91-0001



7.	Fuse coordination concern with MCC 313 and D31 (250 VDC) (Weakness - identified in EDSFI report, Section 2.2.8)	Fuse coordination will be addressed in a Topical DBD.	None
8.	Fuse coordination concern between D33 and D31 (Weakness - EDSFI Report, Section 2.2.9).	Fuse coordination will be addressed in a Topical DBD.	None
9.	Failure of electric heat in the Div. II 250 VDC Battery Room (Open item in EDSFI Report, Section 2.3.4).	FOI issued on battery room temperature controls.	91-0015
10.	Non-seismic HVAC duct in #13 battery room (Closed prior to NRC exit - EDSFI Report, Section 2.3.5).	Five FOIs issued on seismic concerns related to the Battery System.	90-0051 91-0004 91-0022 91-0037 91-0039
11.	General weaknesses in maintenance in regards to lack of the following: component list, trending repair failures, review of vendor maintenance recommendations, reliability centered maintenance, and computerized WRAs (Weakness - identified in EDSFI Report, Section 3).	FOI issued on battery maintenance history.	91-0036
12.	Concern with as-built discrepancies (Weakness - identified in EDSFI Report, Section 3.3).	FOIs issued as a result of walkdown verification activities.	See note
13.	Battery discharge tests do not reflect "as found" conditions (Weakness - identified in EDSFI Report, Section 4.1.2).	FOI issued on incomplete incorporation of recommendations into test procedures.	91-0050
14.	Implementation of maintenance procedures.	FOIs issued as a result of maintenance and testing verification activities.	See note below
15.	Inadequate verification of assumptions in calculations.	FOIs issued as a result of design verification activities.	See note below

Note: In addition to similar findings as noted above, the verification effort identified the following additional concerns (presented by FOI number and title):

<u>FOI NUMBER</u>	<u>TITLE</u>
90-0069	USAR TABLE 7.9.1
91-0003	REPLACEMENT OF THE 250 VDC SYSTEM BATTERY CHARGER INVALIDATES ASSESSMENT OF IEIN 81-05
91-0005	SHORT CIRCUIT RATING FOR 250 VDC SYSTEM PANEL D71 COULD NOT BE LOCATED
91-0007	TECHNICAL SPECIFICATION INACCURACY - TS 3.9.A.4 (BATTERY SYSTEMS)
91-0009	125 VDC SPARE BATTERY CHARGER MISSING DESIGN BASIS INFORMATION
91-0010	125 VDC BATTERY SYSTEM MATERIAL CONDITION
91-0011	OPERATIONS MANUAL SECTION B.9.10 DISCREPANCIES
91-0012	ELECTRICAL DRAWING DISCREPANCIES ON NE-36640
91-0013	BATTERY CELL LABELING
91-0014	DC SYSTEM INSTRUMENT CALIBRATION
91-0016	BATTERY & CHARGER MAINTENANCE
91-0017	QUALITY CLASSIFICATION OF BATTERY SYSTEM COMPONENTS
91-0021	MISCELLANEOUS DOCUMENTATION DEFICIENCIES FOR 125 VDC BATTERY SYSTEM
91-0023	125 VDC BATTERY SYSTEM FLOAT VOLTAGE INCONSISTENCIES
91-0038	MISCELLANEOUS PROCEDURAL DEFICIENCIES
91-0044	BATTERY DISTRIBUTION PANEL RATINGS
91-0051	TRAINING LESSON PLANS

ATTACHMENT 3

PRAIRIE ISLAND CM PROGRAM STATUS  
AS OF DECEMBER 31, 1990

Target milestones to be completed by December 31, 1990 as identified in the NSP/NRC meeting on December 14, 1989:

<u>Milestone</u>	<u>Status</u>
1. Procedure and Writer's Guide Revision following pilot effort.	1. Complete.
2. Completion of 6-10 DBDs on plant systems, structures and topics.	2. 6 DBDs completed and issued.  2 DBDs undergoing final changes to be issued by January 31, 1991.  All 8 DBD's have been verified.
3. Completion of bulk source document retrieval and indexing for DBDs.	3. Complete.
4. Completion of Phase II Electrical Drawing Review.	4. Complete.
5. Completion of Electrical Field Standards Upgrades.	5. Complete.
6. Completion of one SSFI to validate DBD Verification Process.	6. SSFI complete on Safety Injection (SI) System. Comparison between SSFI Request For Information and DBD Verification Follow-on Items included in Attachment IV.

Target Milestones to be Completed by December 31, 1991:

1. Complete 8 additional Design Bases Documents on Prairie Island systems, structures and topics.
2. Initiate Design Standards Section input and review into the NSP modification process.

ATTACHMENT 3  
(Continued)

3. Establish a method to prioritize Configuration Management Improvement activities to ensure that the highest safety importance items are worked on first.

Status of the Follow-On Item (FOI) Program:

1. 412 FOIs identified as of January 10, 1991.
2. One Licensee Event Report (LER) resulting from FOI review:
  - a. LER 1-90-18, Discovery that Certain Valves Should be Subject to ASME Section XI Testing Found Through Design Basis Reconstitution, dated December 28, 1990.

## ATTACHMENT 4

### COMPARISON BETWEEN PRAIRIE ISLAND SSFI AND DBD VERIFICATION RESULTS

#### 1.0 INTRODUCTION

As a means of validating Prairie Island's Configuration Management inspection method (Design Bases Document Development and Verification), an SSFI was performed on a system (Safety Injection) subsequent to the DBD verification. The SSFI was performed by United Energy Service Company (the organization assisting Kewaunee in performing SSFI's) and involved over 1500 man hours of inspection. The DBD verification effort typically involves approximately 500 man hours. The SSFI was performed in November and early December 1990. The SSFI addressed issues beyond the design of the Safety Injection System, however, the results of the DBD Verification (Follow-On Items - FOIs) can be favorably compared to the results of the SSFI (Requests for Information - RIs). Table 1 is an item-by-item discussion of SSFI RIs.

#### 2.0 RESULTS

The SSFI produced 26 Requests for Information (RIs). Of these RIs:

- a. Five RIs reported issues previously identified by the SI DBD verification,
- b. Four RIs identified concerns documented during other system DBD verifications,
- c. Two RIs identified issues that NSP believes would have been identified during future DBD verification (the SSFI explored components outside the SI DBD boundary; i.e., DC fuses and voltage, EQ issues, etc.),
- d. Four RIs were determined to not represent a valid concerns,
- e. One RI was written as a result of an NRC Information Notice (IN) received subsequent to the SI DBD verification, and,
- f. Six RIs raised issues involving areas outside design basis verification scope (e.g. storage of QA records, sampling techniques).

In addition, five RIs were associated with the maintenance and testing of a functionally non-safety related SI Recirculation Pump. The pump operates to prevent stagnation in the SI Pump suction piping; however, it is powered from a non-safeguard bus and non-operation does not adversely impact the function of the SI system. It is noted that the DBD verification (FOIs) raised several concerns not uncovered by the SSFI. A total of 98 FOIs were identified in the DBD verification effort. Most notably, the SSFI did not discover that instrument error was not factored into post modification testing of the SI Pump Recirc Orifice Change (FOI A0097).

### 3.0 CONCLUSION

There exists good correlation between the SI DBD verification and the SI SSFI. Prairie Island is pursuing resolution of concerns raised by each. Both activities reach the same conclusion, i.e. that the "SI system is of sound design and the system will perform its intended functions". Based on these results, NSP believes the DBD Verification Program achieves fundamentally the same, or better, results in a more economical and efficient manner.

## ATTACHMENT 4

TABLE 1

<u>SI SSFI RI#</u>	<u>Description</u>	<u>SI FOI #</u>	<u>Comments</u>
RI-01-ST	DBD Inconsistencies - local discharge pressure gauges were not addressed in the DBD.	None	A revision to the DBD will add these gauges. This is judged to be of minor significance.
RI-02-ME	Seismic effects of water sloshing in the RWST and Accumulators due to a Seismic Event was apparently not an initial design criterion.	None	Seismic consideration will be evaluated in a future seismic DBD. NSP believes that this item would have been identified at that time. The RI is now an FOI and will be evaluated for validity and impact.
RI-03-WD	Conflicting bolting requirements for the SI System. The SI Pump Suction Relief Valves have both stainless and ferritic steel bolting material.		This item was not re-reviewed in the sample walkdown of the DBD Verification. The SSFI performed a 100% walkdown. Subsequent review indicates that either stainless or ferritic steel is acceptable.
RI-04-WD	SI Pump Suction Relief Valve 2SI-4-1 missing label plate.		Not addressed in the DBD Verification. Uncertain if label existed at that time. This will be handled under the plant labeling program.
RI-05-WD	As-Built SI System apparently not in accordance with drawings. 2 vent valves were not on plant flow drawings.	None	Vent valves were added by a modification to Containment Spray System performed after the SI DBD verification. The flow drawing used by the SSFI team was not the controlled updated

			interim drawing (which shows the valves).
RI-06-OP	SI Design Criteria does not appear to address the application of single failure criteria for check valves.	A0076	NSP is presently evaluating FOI A0076.
RI-07-WD	Discrepancies with Unit 1 and 2 MOV's. Concerns with potential hand wheel interferences and local position indication.	None	NSP believes that this is outside the scope of design verification. Concerns are being addressed by Plant Operations and Technical Support Staff.
RI-08-ME	Lack of procedure to control boric acid crystallization in the SI Pumps and System following actuation (NRC IN 86-63).	None	No standing procedure exists to perform this action; however, flushing of pumps and system has been done under work request after each SI actuation.
RI-09-EE	SI Pump Motor may not accelerate to its full load during Loss of Offsite Power coincident with a Loss of Coolant Accident (LOCA).	None	The Technical Specification requires testing this function at every refueling outage. The SSFI team did not review the correct documents (this RI is invalid). In addition, design information has been located which evaluated this issue.
RI-10-ME	Safety Injection Accumulator Temperature Transients Review apparently not in accordance with Code and QA requirements. A recent thermal fatigue analysis did not follow ASME code format.	None	A review of the analysis concluded that it does adequately address these concerns.
RI-11-OP	Sampling of BAST for Boric Acid Concentration. A potential error could exist from dilution when sampling 12W% Boric Acid.	None	This is outside the scope of the design verification. The Prairie Island Chemistry Department is evaluating this RI.



The NRC Region III Chemistry Section has been informed.

RI-12-EE	DC Power Supply and possible affects on the SI System.	None	Because of the boundary between DC and SI Systems this was not part of the SI DBD verification. However, the DC DBD verification did generate FOI A0203 and A0208 which raise these issues.
RI-13-EE	Potential Fuse Control Program Weakness.	None	This issue was identified during the Fire Protection DBD FOI A0389.
RI-14-MT	Vendor Manual and SI Recirculation Pump Procedure inconsistencies. The SI Recirc. Pump is a QA III non-safety pump, whose function is to prevent stratification in the SI pump suction line.	A0100	The Technical Manual issue was previously raised by the SI DBD. After the Technical Manual is issued the pump preventive maintenance procedures will be reviewed.
RI-15-MT	Maintenance procedure documentation discrepancy. Some steps in the seal replacement procedure for the SI Recirc. Pump (see RI-14-MT) do not require documenting readings.	None	This issue is outside the scope of the DBD design verification and is judged to be an improvement item as opposed to design deficiency.
RI-16-MT	Apparent lack of Post Maintenance Testing of SI Recirculation Pumps. Vibration readings are not required to be taken on the SI Recirc. Pumps (see RI-14-MT) after maintenance.	None	This issue (non-safety related pump) is outside the scope of the DBD design verification, although, maintenance activities are reviewed. Plant maintenance improvements are intended to address issues such as these.
RI-17-MT	Apparent Lack of a PM Program for SI Recirculation Pumps (See RI-14-MT).	None	This issue (non-safety related pump) is outside the scope of the DBD design

verification and is being addressed by the plant technical staff.

RI-18-ME	Lack of Status of SI Orifice Plates. This is based on NRC IN 90-65.	None	This notice was received after the DBD was verified. The plant's OEA program is addressing this issue.
RI-19-EE	SI Pump Motor Cable may not be properly sized. A short in the SI Pump Motor may cause high enough current in the cable to cause long term insulation damage. This is before the motor breaker trips.	None	This is a new FOI. Issues such as cable sizing criteria will be covered and verified in the Electrical Design DBD scheduled to be done in 1991.
RI-20-OP	ECCS Performance during Mode 4 Operation. Prairie Island does not have an emergency procedure for a LOCA at Hot Shutdown.	A0249	Previously identified by the SI DBD verification.
RI-21-QA	Apparent lack of verification of SI recirculation flow. The SI Recirc. Pump (see RI-14-MT) may not have been flow tested to see that it meets its curve.	None	This issue is now addressed by an FOI. Note that this is a non-safety related pump.
RI-22-QA	Lack of Modification Review to determine maintenance and fuse requirements.  Question on the SI Recirc Pump (see RI-14-MT) and updating of the Electrical Distribution Panel Listing for fuses.	None	This is outside the scope of the SI DBD; however, other DBD's generated FOI A0130 and A0173 to address this issue.
RI-23-QA	Lack of an adequate 10CFR 50.59 review. The basis of the design was not clearly stated in the modification package.	None	This issue was raised by another DBD verification (FOI A0233).

RI-24-QA	QA Record Storage Discrepancies. The vault for storage of records may not meet ANSI and NSP requirements.	None	This is outside the scope of the DBD design verification.
RI-25-QA	DBD Discrepancies. Several discrepancies in the DBD were identified during the SSFI.	A0051, A0055, A0057, A0116, A0117, A0241	A number of the discrepancies were previously uncovered; however, a new FOI addresses the remaining discrepancies.
RI-26-ME	Apparent Insufficient SI Pump NPSH.	A0113	This concern was raised in the SI DBD verification.

Note: This table only compares the 26 SSFI RIs to the DBD Verification FOIs. However, a table of 98 DBD Verification FOIs was identified in the DBD Verification Program.