



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 23, 2013

To Those on the Enclosed List

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, FLOODING
WALKDOWNS

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct flooding hazard walkdowns to verify the plant configuration with the current licensing basis. The licensees stated by letter that the flooding walkdowns would be performed in accordance with Nuclear Energy Institute 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," May 2012. Following the NRC staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

Enclosed is a request for additional information (RAI) related to flooding walkdowns. The NRC staff requests that you respond no later than January 31, 2014. If you have any questions related to the enclosed RAI or the requested submission date, please contact your assigned plant Project Manager.

Sincerely,

A handwritten signature in black ink, which appears to read "Bob Pascarelli FOR RTP".

Robert J. Pascarelli, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Request for Additional Information
2. Addressee List

cc w/encls: Listserv

REQUEST FOR ADDITIONAL INFORMATION

Flooding Walkdowns

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340) requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct flooding hazard walkdowns to identify and address plant-specific degraded, nonconforming, or unanalyzed conditions through the corrective action program (CAP). All licensees stated by letter that the flooding walkdowns would be performed in accordance with Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," May 2012 (ADAMS Accession No. ML12172A038). Following the NRC staff's initial review of the reports documenting the results of the licensees' walkdowns, regulatory site audits were conducted at a sample of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

Determination and documentation of available physical margin (APM)

Background:

The NRC staff observed that several licensees did not consistently determine and/or document available physical margin (APM) in a manner that met the expected interpretation of NEI 12-07 during audits associated with review of the NTTF Recommendation 2.3 report submittals. APM is defined in section 3.13 of NEI 12-07 and the process for obtaining and evaluating APM values is described in section 5.8 of NEI 12-07. Consistent with NEI 12-07, a numerical value for APM should be determined and documented for every applicable flood protection feature (e.g., wall, penetration, berm, door, etc.). This would normally be a numerical value reflecting the difference between the licensing basis flood height at the location of the feature and the point at which the function of the flood protection feature is compromised (e.g., the top of a barrier or the height of the first unsealed penetration in a barrier) such that the resulting flood can affect a structures, systems, and components important to safety. Next, in accordance with Section 5.8 of NEI 12-07, if the APM appears to be small and the consequences of flooding appear to be significant, the licensee should enter the condition into the CAP and appropriate action be taken. While NEI 12-07 does not require that a specific numerical threshold value for "small" APM be defined for each site, doing so establishes a consistent basis for determining what instances need to be entered into the CAP. If a numerical APM value cannot be determined for any flood protection feature, the licensee should perform an assessment of the ability of the barrier to withstand the licensing basis flood plus the contribution of the additional water corresponding to the pre-established small-margin threshold value. If the barrier can withstand this flood, the APM for the feature is "not small" and further evaluation in accordance with Section 5.8 of NEI 12-07 is not required. It is further noted that conclusions regarding "large" values of APM should be based on engineering evaluations or existing design documents.

Licensees should ensure that the process for APM determination and evaluation used during their flooding walkdowns is consistent with the guidance in NEI 12-07. The intent of this RAI is not to repeat the flooding walkdowns or perform an extensive revision of the walkdown record

forms and other paperwork. Instead the purpose is to verify or modify the process used to determine APM such that every site is aware of the margin at each of its flood protection features and take appropriate interim actions when the APM is small and the consequences are significant. Instances where numerical values for APM were not determined, or where the basis for the APM was found to be questionable, should be rectified by either the documentation of a specific value or an explanation of why a non-numerical value is appropriate.

Request:

Please provide the following:

1. Confirmation that the process for evaluating APM was reviewed;
2. Confirmation that the APM process is now or was always consistent with the guidance in NEI 12-07 and discussed in this RAI;
3. If changes are necessary, a general description of any process changes to establish this consistency;
4. As a result of the audits and subsequent interactions with industry during public meetings, NRC staff recognized that evaluation of APM for seals (e.g., flood doors, penetrations, flood gates, etc.) was challenging for some licensees. Generally, licensees were expected to use either Approach A or Approach B (described below) to determine the APM for seals:
 - a) If seal pressure ratings were known, the seal ratings were used to determine APM (similar to example 2 in Section 3.13 of NEI 12-07). A numerical value for APM was documented. No further action was performed if the APM value was greater than the pre-established small-margin threshold value. If the APM value was small, an assessment of "significant consequences" was performed and the guidance in NEI 12-07 Section 5.8 was followed.
 - b) If the seal pressure rating was not known, the APM for seals in a flood barrier is assumed to be greater than the pre-established small-margin threshold value if the following conditions were met: (1) the APM for the barrier in which the seal is located is greater than the small-margin threshold value and there is evidence that the seals were designed/procured, installed, and controlled as flooding seals in accordance with the flooding licensing basis. Note that in order to determine that the seal has been controlled as a flooding seal, it was only necessary to determine that the seal configuration has been governed by the plant's design control process since installation. In this case, the APM for the seal could have been documented as "not small".

As part of the RAI response, state if either Approach A or Approach B was used as part of the initial walkdowns or as part of actions taken in response to this RAI. No additional actions are necessary if either Approach A or B was used.

If neither Approach A or B was used to determine the APM values for seals (either as part of the walkdowns or as part of actions taken in response to this RAI), then perform the following two actions:

- Enter the condition into the CAP (note: it is acceptable to utilize a single CAP entry to capture this issue for multiple seals). CAP disposition of "undetermined" APM values for seals should consider the guidance provided in NEI 12-07, Section 5.8. The CAP disposition should confirm all seals can perform their intended safety function against floods up to the current licensing basis flood height. Disposition may occur as part of the Integrated Assessment. If an Integrated Assessment is not performed, determine whether there are significant consequences associated with exceeding the capacity of the seals and take interim action(s), if necessary, via the CAP processes. These actions do not need to be complete prior to the the RAI response.
- Report the APM as "undetermined" and provide the CAP reference in the RAI response.

List of Addressees

Arkansas Nuclear One, Units 1 and 2
Docket Nos. 50-313 and 50-368

Vice President, Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72802

Beaver Valley Power Station, Units 1 and 2
Docket Nos. 50-334 and 50-412

Mr. Eric A. Larson, Site Vice President
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Mail Stop A-BV-SEB1
P.O. Box 4, Route 168
Shippingport, PA 15077

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Docket Nos. 50-259, 50-260 and 50-296

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

Byron Station, Units 1 and 2/Braidwood Station,
Units 1 and 2
Docket Nos. 50-454, 50-455, 50-456, and 50-457

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO) - Exelon
Nuclear
4300 Winfield Road
Warrenville, IL 60555

Callaway Plant, Unit 1
Docket No. 50-483

Mr. Adam C. Heflin
Senior Vice President and Chief Nuclear Officer
Union Electric Company
Ameren Missouri
P.O. Box 620
Fulton, MO 65251

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Docket Nos. 50-317 and 50-318

Mr. George H. Gellrich, Vice President
Calvert Cliffs Nuclear Power Plant, LLC.
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414

Mr. Kelvin Henderson, Site Vice President
Duke Energy Carolinas, LLC
Catawba Nuclear Station, Units 1 & 2
4800 Concord Road
York, SC 29745

Clinton Power Station, Unit No. 1
Docket No. 50-461

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO) Exelon
Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

Columbia Generating Station
Docket No. 50-397

Mr. Mark E. Reddemann, Chief Executive Officer
Energy Northwest
MD 1023, North Power Plant Loop
P.O. Box 968
Richland, WA 99352

Comanche Peak Nuclear Power Plant, Units 1 and 2
Docket Nos. 50-445 and 50-445

Mr. Rafael Flores
Senior Vice President & Chief Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

Cooper Nuclear Station
Docket No. 50-298

Mr. Oscar A. Limpias, Vice President-Nuclear and
Chief Nuclear Officer
Nebraska Public Power District
Cooper Nuclear Station
72676 648A Avenue
P.O. Box 98
Brownville, NE 68321

Davis-Besse Nuclear Power Station, Unit 1
Docket No. 50-346

Mr. Ray Lieb, Vice President
FirstEnergy Nuclear Operating Company
c/o Davis-Besse NPS
5501 N. State Route 2
Oak Harbor, OH 43449-9760

Donald C. Cook Nuclear Plant, Units 1 and 2
Docket Nos. 50-315 and 50-316

Mr. Lawrence J. Weber
Senior Vice President and Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

Diablo Canyon Power Plant, Unit Nos. 1 and 2
Docket Nos. 50-275 and 50-323

Mr. Edward D. Halpin, Senior Vice President and
Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 56
Mail Code 104/6
Avila Beach, CA 93424

Dresden Nuclear Power Station, Units 2 and 3
Docket Nos. 50-237 and 50-249

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Duane Arnold Energy Center
Docket No. 50-331

Mr. Rich Anderson, Site Vice President
Next Era Energy
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324-9785

Edwin I. Hatch Nuclear Plant Units 1 and 2
Docket Nos. 50-321 and 50-366

Mr. C. R. Pierce, Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295 / BIN B038
Birmingham, AL 35201-1295

Fermi, Unit 2
Docket No. 50-341

Mr. Joseph H. Plona, Senior VP and Chief Nuclear
Officer
Detroit Edison Company
Fermi 2 - 210 NOC
6400 North Dixie Highway
Newport, MI 48166

Fort Calhoun Station, Unit 1
Docket No. 50-285

Mr. Louis Cortopassi, Vice President and Chief
Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
Mail Stop FC-2-4
9610 Power Lane
Blair, NE 68008

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416

Vice President, Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261

Mr. William R. Gideon, Vice President
H.B. Robinson Steam Electric Plant
Duke Energy Progress, Inc.
3581 West Entrance Road
Hartsville, SC 29550

Indian Point Nuclear Generating Unit Nos. 2 and 3
Docket Nos. 50-247 and 50-286

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333

Mr. Chris Adner, Licensing Manager
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Joseph M. Farley Nuclear Plant, Units 1 and 2
Docket Nos. 50-348 and 50-364

Mr. C. R. Pierce, Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295 / BIN 038
Birmingham, AL 35201-1295

LaSalle County Station, Units 1 and 2
Docket Nos. 50-373 and 50-374

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO) Exelon
Nuclear
4300 Winfield Road
Warrenville, IL 60555

Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353

Mr. Michael J. Pacilio, President and Chief Nuclear
Officer
Exelon Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

Monticello Nuclear Generating Plant, Unit 1
Docket No. 50-263

Ms. Karen D. Fili, Site Vice President
Northern States Power Company - Minnesota
Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362-9637

Nine Mile Point Nuclear Station, Units 1 and 2
Docket Nos. 50-220 and 50-410

Mr. Christopher Costanzo, Vice President
Nine Mile Point Nuclear Station, LLC
P. O. Box 63
Lycoming, NY 13093

North Anna Power Station, Units 1 and 2
Docket Nos. 50-338 and 50-339

Mr. David A. Heacock, President and Chief Nuclear
Officer
Virginia Electric & Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, VA 23060

Oconee Nuclear Station, Units 1, 2 and 3
Docket Nos. 50-236, 50-270 and 50-287

Mr. Scott Batson
Vice President, Oconee Nuclear Station
Duke Energy Carolinas, LLC
7800 Rochester Highway
Seneca, SC 29672

Palisades Nuclear Plant
Docket No. 50-355

Mr. Anthony J. Vitale, Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

Palo Verde Nuclear Generating Station, Units 1, 2,
and 3
Docket Nos. 50-528, 50-529 and 50-530

Mr. Randall K. Edington
Executive Vice President Nuclear/CNO
Arizona Public Service Company
P.O. Box 52034, MS 7602
Phoenix, AZ 85072-2034

Peach Bottom Atomic Power Station, Units 2 and 3
Docket Nos. 50-277 and 50-278

Mr. Michael J. Pacilio, President and Chief Nuclear
Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Perry Nuclear Power Plant, Unit 1
Docket No. 50-440

Mr. Ernest J. Harkness, President and Chief
Nuclear Officer
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
10 Center Road, A290
Perry, OH 44081

Pilgrim Nuclear Power Station Unit No. 1
Docket No. 50-293

Mr. John Dent, Jr., Vice President – Site VP
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

Point Beach Nuclear Plant, Units 1 and 2
Docket Nos. 50-266 and 50-301

Mr. Larry Meyer, Site Vice President
NextEra Energy Point Beach, LLC
Point Beach Nuclear Plant, Units 1 & 2
6610 Nuclear Road
Two Rivers, WI 54241-9516

Prairie Island Nuclear Generating Plant,
Units 1 and 2
Docket Nos. 50-282 and 50-306

Mr. James E. Lynch, Site Vice President
Northern States Power Company - Minnesota
Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089-9642

R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Mr. Joseph E. Pacher, Vice President
R.E. Ginna Nuclear Power Plant
R.E. Ginna Nuclear Power Plant, LLC
1503 Lake Road
Ontario, NY 14519

River Bend Station, Unit 1
Docket No. 50-458

Vice President, Operations
Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775

Seabrook Station, Unit No. 1
Docket No. 50-443

Mr. Kevin Walsh, Site Vice President
c/o Michael Ossing
Seabrook Station
NextEra Energy Seabrook, LLC
P.O Box 300
Seabrook, NH 03874

Sequoyah Nuclear Plant, Units 1 and 2
Docket Nos. 50-327 and 50-328

Mr. Joseph W. Shea
Vice President, Corporate Nuclear Licensing
Tennessee Valley Authority
3R Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400

Mr. Ernest J. Kapopoulos, Jr., Vice President
Duke Energy Progress, Inc.
Shearon Harris Nuclear Power Plant
P.O. Box 165, Mail Zone 1
New Hill, NC 27562-0165

South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Mr. Dennis L. Koehl, President and CEO/CNO
STP Nuclear Operating Company
South Texas Project Electric Generating Station
P.O. Box 289
Wadsworth, TX 77483

St. Lucie Plant Units 1 and 2
Docket Nos. 50-335 and 50-289

Mr. Mano Nazar, Executive VP and Chief Nuclear
Officer
NextEra Energy
P. O. Box 14000
700 Universe Boulevard
Juno Beach, FL 33408-0420

Surry Power Station, Unit Nos. 1 and 2
Docket Nos. 50-280 and 50-281

Mr. David A. Heacock, President & Chief Nuclear
Officer
Virginia Electric & Power Company
5000 Dominion Blvd.
Glen Allen, VA 23060

Susquehanna Steam Electric Station, Units 1 and 2
Docket Nos. 50-387 and 50-388

Mr. Timothy S. Rausch, Senior Vice President and
Chief Nuclear Officer
PPL Susquehanna, LLC
769 Salem Boulevard
NUCSB3
Berwick, PA 18603-0467

Three Mile Island Nuclear Station, Unit 1
Docket No. 50-289

Mr. Michael J. Pacilio, President and Chief Nuclear
Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

Mr. Mano Nazar, Executive VP and Chief Nuclear
Officer
NextEra Energy
P. O. Box 14000
Juno Beach, FL 33408-0420

Virgil C. Summer Nuclear Station, Unit 1
Docket No. 50-395

Mr. Thomas D. Gatlin, Vice President
Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88, Mail Code 800
Jenkinsville, SC 29065

Vogtle Electric Generating Plant, Units 1 and 2
Docket Nos. 50-424 and 50-425

Mr. C. R. Pierce, Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295 / BIN 038
Birmingham, AL 35201-1295

Waterford Steam Electric Station, Unit 3
Docket No. 50-382

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-0751

Watts Bar Nuclear Plant, Unit 1
Docket No. 50-390

Mr. Joseph W. Shea, Corporate Manager, Nuclear
Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

William B. McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370

Mr. Steven D. Capps, Vice President
McGuire Site
Duke Energy Carolinas, LLC
McGuire Nuclear Station
12700 Hagers Ferry Road
Huntersville, NC 28078-8985

Wolf Creek Generating Station, Unit 1
Docket No. 50-482

Mr. Matthew W. Sunseri
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

December 23, 2013

To Those on the Enclosed List

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, FLOODING
WALKDOWNS

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Sincerely,

/ra/ (G.E. Miller for)

Robert J. Pascarelli, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Request for Additional Information
2. Addressee List

cc w/encls: Listserv

DISTRIBUTION:

See next page

ADAMS Accession No. ML13325A891

***via e-mail**

OFFICE	NRR/JLD/PMB	NRR/DORL/LPL4-1/LA	NRO/DSEA/RHMB/BC
NAME	RKuntz	JBurkhardt	SFlanders *
DATE	11/22/13	11/22/13	12/19/13
OFFICE	NRR/JLD/PMB/BC	NRR/DORL/LPLII-1/BC (GMiller for)	
NAME	LMR for MMitchell	RPascarelli	
DATE	12/23/13	12/23/13	

OFFICIAL RECORD COPY

Letter to Selected Power Reactor Licensees from Robert J. Pascarelli dated December 23, 2013

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, FLOODING
WALKDOWNS

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RidsNrrPMCooper
RidsNrrPMDavisBesse
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RidsNrrPMMcGuire
RidsNrrPMMonticello
RidsNrrPMNineMilePoint
RidsNrrPMNorthAnna
RidsNrrPMOconee
RidsNrrPMPalisades
RidsNrrPMPaloVerde
RidsNrrPM PeachBottom
RidsNrrPMPerry
RidsNrrPMPilgrim
RidsNrrPMPointBeach
RidsNrrPMPrairieIsland
RidsNrrPMREGinna
RidsNrrPMRiverBend
RidsNrrPMRobinson
RidsNrrPMSeabrook
RidsNrrPMSequoyah
RidsNrrPMShearonHarris
RidsNrrPMSouthTexas
RidsNrrPMStLucie
RidsNrrPMSummer
RidsNrrPMSurry
RidsNrrPMSusquehanna
RidsNrrPMTThreeMileIsland
RidsNrrPMTurkeyPoint
RidsNrrPMVogtle
RidsNrrPMWaterford
RidsNrrPMWattsBar1
RidsNrrPMWolfCreek