



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

March 27, 2014

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

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2 EVALUATIONS OF CHANGES,
TESTS, AND EXPERIMENTS AND PERMANENT PLANT MODIFICATIONS
BASELINE INSPECTION REPORT 05000456/2014008; 05000457/2014008

Dear: Mr. Pacilio:

On March 27, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications inspection at your Braidwood Station, Units 1 and 2. The enclosed inspection report documents the inspection results which were discussed on March 27, 2014, with Mr. P. Raush and other members of your staff.

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

The NRC inspectors did not identify any findings or violations of more than minor significance.

In accordance with Title 10, *Code of Federal Regulations* (CFR), Section 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-456; 50-457
License Nos. NPF-72; NPF-77

Enclosure:
Inspection Report 05000456/2014008; 05000457/2014008
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ™

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-456; 50-457

License No: NPF-72; NPF-77

Report No: 05000456/2014008; 05000457/2014008

Licensee: Exelon Generating Company, LLC

Facility: Braidwood Station, Units 1 and 2

Location: Braceville, IL

Dates: January 21 through March 27, 2014

Inspectors: D. Szwarc, Senior Reactor Inspector
N. Félix Adorno, Reactor Inspector
I. Hafeez, Reactor Inspector

Approved by: Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000456/2014008, 05000457/2014008; 01/21/2014 – 03/27/2014; Braidwood Station, Units 1 and 2; Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications.

This report covers a two-week announced baseline inspection on evaluations of changes, tests, and experiments and permanent plant modifications. The inspection was conducted by Region III based engineering inspectors. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Initiating Events

No findings of significance were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Initiating Events, Mitigating Systems, and Barrier Integrity

1R17 Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications (71111.17)

.1 Evaluation of Changes, Tests, and Experiments

a. Inspection Scope

The inspectors reviewed seven safety evaluations performed pursuant to Title 10, Code of Federal Regulations (CFR) 50.59 to determine if the evaluations were adequate and that prior NRC approval was obtained as appropriate. The inspectors also reviewed 13 screenings where licensee personnel had determined that a 10 CFR 50.59 evaluation was not necessary. The inspectors reviewed these documents to determine if:

- the changes, tests, and experiments performed were evaluated in accordance with 10 CFR 50.59 and that sufficient documentation existed to confirm that a license amendment was not required;
- the safety issue requiring the change, tests and experiment was resolved;
- the licensee conclusions for evaluations of changes, tests, and experiments were correct and consistent with 10 CFR 50.59; and
- the design and licensing basis documentation was updated to reflect the change.

The inspectors used, in part, Nuclear Energy Institute (NEI) 96-07, "Guidelines for 10 CFR 50.59 Implementation," Revision 1, to determine acceptability of the completed evaluations, and screenings. The NEI document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," dated November 2000. The inspectors also consulted Part 9900 of the NRC Inspection Manual, "10 CFR Guidance for 10 CFR 50.59, Changes, Tests, and Experiments."

This inspection constituted seven samples of evaluations and 13 samples of screenings as defined in IP 71111.17-04.

b. Findings

No findings of significance were identified.

.2 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed seven permanent plant modifications that had been installed in the plant during the last three years. This review included in-plant walkdowns for portions of the modified diesel generator governor booster; backup power supplies for

the steam generator power operated relief valves; isolation valves in the safety injection system; temporary scaffolds; and electrical circuits related to high energy line break (HELB) in the diesel generator rooms, miscellaneous electric rooms, and engineered safety features switchgear rooms. The modifications were selected based upon risk significance, safety significance, and complexity. The inspectors reviewed the modifications selected to determine if:

- the supporting design and licensing basis documentation was updated;
- the changes were in accordance with the specified design requirements;
- the procedures and training plans affected by the modification have been adequately updated;
- the test documentation as required by the applicable test programs has been updated; and
- post-modification testing adequately verified system operability and/or functionality.

The inspectors also used applicable industry standards to evaluate acceptability of the modifications. The list of modifications and other documents reviewed by the inspectors is included as an attachment to this report.

This inspection constituted seven permanent plant modification samples as defined in IP 71111.17-04.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution

.1 Routine Review of Condition Reports

a. Inspection Scope

The inspectors reviewed several corrective action process documents that identified or were related to 10 CFR 50.59 evaluations and permanent plant modifications. The inspectors reviewed these documents to evaluate the effectiveness of corrective actions related to permanent plant modifications and evaluations of changes, tests, or experiments. In addition, corrective action documents written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problems into the corrective action system. The specific corrective action documents that were sampled and reviewed by the inspectors are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

4OA6 Meetings

.1 Exit Meeting Summary

On March 27, 2014, the inspectors presented the inspection results to Mr. P. Raush and other members of the licensee staff. The licensee personnel acknowledged the inspection results presented.

.2 Interim Exit Meeting

On February 20, 2014, the inspectors presented the inspection results to Mr. J. Bashor and other members of the licensee staff.

.3 Interim Exit Meeting

On February 7, 2014, the inspectors presented the inspection results to Mr. M. Kanavos, and other members of the licensee staff. The inspectors confirmed that all proprietary material reviewed during the inspection was returned to the licensee staff.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

M. Kanavos, Plant Manager
M. Marchionda, Plant Manager
J. Bashor, Engineering Director
A. Ferko, Operations Manager
R. Belair, Mechanical Design Engineering Manager
P. Raush, Regulatory Assurance Manager
D. Riedinger, Engineering Training
G. Wilhelmsen, Design Engineering Manager
M. Abbas, NRC coordinator

Nuclear Regulatory Commission

J. Benjamin, Senior Resident Inspector
R. Daley, Chief, Reactor Safety, Engineering Branch 3
E. Duncan, Chief, Reactor Projects, Branch 3

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened, Closed, and Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

10 CFR 50.59 EVALUATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
BRW-E-2011-122	Installation of Backup Power Supplies for the Steam Generator Power Operated Relief Valves	October 21, 2011
BRW-E-2012-085	Change In-Core Decay Time for A1R16	April 13, 2012
BRW-E-2012-120	Eliminating Action 3.3.y.D from TRM 3.3.y	May 30, 2012
BRW-E-2012-126	Install Time Delayed Auto-Restart for U-1 (U-2) VD Fans in Support of HELB Mitigation Strategy	August 12, 2013
BRW-E-2012-155	Lake Screen House Traveling Screen Level Control	September 7, 2012
BRW-E-2012-156	Install Time Delay Auto-Restart for U-1 (U-2) VX Fans in Support of HELB Mitigation Strategy	January 31, 2013
BRW-E-2012-186	Abnormal Component Position Sheet for Closing the Isolation Valves to the MSIV Hydraulic Accumulator Manifolds' Relief Valves	September 11, 2012

10 CFR 50.59 SCREENINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
BRW-S-2011-084	Retention of a Temporary Scaffold Installed in the 2A RHR Heat Exchanger Room Beyond 90 Days	June 9, 2011
BRW-S-2011-088	Revised NPSH Required Value for the CV Pumps	June 23, 2011
BRW-S-2011-097	Incorporate Time Delay Relay into 1 & 2 VD Fans High Differential Pressure Trip Circuit Due to Turbine Building High Energy Line Break (HELB)	July 14, 2011
BRW-S-2011-138	Revision to UFSAR Section 9.2.2.5 "Test and Inspections" and Revision of Related Procedures	August 31, 2011
BRW-S-2011-162	Retention of Three Non-Permanent Scaffolds Installed in the U1 Auxiliary Building on the 426' Elevation Beyond 90 Days	October 13, 2011
BRW-S-2012-101	Receiving Bulk Loads of Sodium Bromide into 0CF19T	May 4, 2012
BRW-S-2012-124	UFSAR Change to Table 3-2-1 for Aux Safeguard Relay Cabinet Indicating Lights (1/2 EL-LV002 &	June 13, 2012

10 CFR 50.59 SCREENINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	003)	
BRW-S-2012-150	Revise EDG Fuel Calculations to Address Frequency and CDBI Identified Issues	July 31, 2012
BRW-S-2012-228	Revision of the <75 VDC DC Ground Value for a Bus Cross Tie to a <103 VDC Action Value.	October 27, 2012
BRW-S-2012-238	UFSAR Update for Generic Letter 2008-01 Response	November 9, 2012
BRW-S-2013-039	ESF Switchgear Room Fan 1(2)VX01C DP Switch Setpoint Change and Non-ESF Switchgear Room Vent Fan 1(2)VX02C DP Switch Setpoint Change	April 9, 2013
BRW-S-2013-041	Transferring a 4160V or 6900V Bus from a Unit Auxiliary Transformer to a System Auxiliary Transformer	April 10, 2013
BRW-S-2013-069	Retention of Temporary Scaffold S-1543 Beyond 90 Days	May 10, 2013
BRW-S-2013-348	Turbine Building Floor Drain Sump Level High High	February 14, 2013

CALCULATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
19-T-6	Diesel Generator Loading During LOOP / LOCA – Braidwood Unit 1	6F
BRW-00-0010-M	Byron/Braidwood Uprate Project – Spent Fuel Pool Temperature Analysis	April 11, 2012
BRW-04-0005-M	RHR, SI, CV and CS Pumps NPSH During ECCS Injection Mode	July 7, 2011
BRW-11-0115-M	Evaluation of the Potential for CV Pump Gas Binding	November 10, 2011
BRW-96-362-I	Diesel Oil Storage Tank Level Setpoints	October 5, 2012
BRW-97-0274	Containment Spray Additive Tank Level Switch LO-2 Setpoint Analysis	2A
PSA-B-98-08	Byron/Braidwood ECCS Flow Calculations for Safety Analysis	3E

CORRECTIVE ACTION PROGRAM DOCUMENTS INITIATED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
1611719	NRC Poses Question on 50.59 Screening BRW-S-2013-348	January 23, 2014
1611724	Old Calculation Needs to be Superseded	January 23, 2014
1613724	NRC 2014 50.59 Inspection, Error in Procedures BWAR 2-15-A11 ~ D11	January 28, 2014
1615733	Missing Records for Scaffold Installed in 2A RHR HX Room	January 31, 2014
1616558	Deficiencies Noted During an NRC Walkdown	February 3, 2014
1617606	EDG Governor Booster Line Slopes Not In Accordance with EC	February 5, 2014
1617670	Permanent Scaffolds Missing Documentation	February 5, 2014
1617930	50.59 Document Not Aligned with Scaffold Procedure	February 6, 2014
1618112	Lessons Learned: NRC MODS/50.59 Baseline Inspection	February 6, 2014

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
1142820	GL 08-01: Procedure Enhancement for 1/2BWOSR 3.5.2.2-2	November 19, 2010
1146838	NRC ID – Revise Calculation to Show Disposition of Vortex in CSAT	November 30, 2010
1234663	B4 Trend Code: 2LDS-SW007 As Found OOT	June 28, 2011
1237140	Non-Conservative Inputs to HELB Analysis	July 6, 2011
1264955	SOER 7-02 Event Readiness –CW Pump Trip Lifted	September 19, 2011
1269263	NRC MOD/50.59 Inspection – Concrete Compressive Strength	September 27, 2011
1323285	GL 2008-01 Analyses and Evaluations Require an UFSAR Update	February 6, 2012
1353449	LR Revise UFSAR Table 3.2-1 for LV Lights	April 13, 2012
1383554	PI&R Action to Address Previous Issue Not Adequate	June 29, 2012
1409900	Potential Unidentified Condition with MSIV Accumulator	September 6, 2012
1433324	Label Request for EC 389506	November 29, 2012
1452606	2B DG Governor Booster – Improve Oil Inlet Line Arrangement	December 15, 2012
1460488	CCP: Need Labels Made For New VD Temperature Switches	February 8, 2013
1463427	EC 389506 Revision 001 Label Request	February 15, 2013
1466005	Scheduling Conflict with HELB Mods and DOST Sprinkler Mods	February 22, 2013

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
1468255	1HS-VD040 As Found Wiring did not Match Design Drawing CCP	February 28, 2013
1473152	1WF040A – Essential Service WTR Sump PMP 1A Discharge Check	February 9, 2013
1493072	CCP :Unit 1 Drawing is Referred in Unit 2	April 26, 2013
1543966	Retesting of 1TS-VD002A Required Due to OOT M&TE	September 5, 2013
1543967	Retesting of 1TS-VD002B Required Due to OOT M&TE	September 5, 2013
1589107	2013 FASA for Pre-NRC MOD/50.59 Inspection Deficiency – 50.59 Screen	November 22, 2013

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
20E-0-3600	Braidwood Unit 1& 2 Electrical Floor and Wall	1
20E-1-4030VD01	Schematic Diagram Diesel Generator Room 1A HVAC System Ventilation Fan 1A 1VD01CA	M
20E-1-4030VD03	Schematic Diagram Diesel Generator Room 1A HVAC System Ventilation and Exhaust Fans Auxiliary Relays, Switches and Alarms -Part I	O
20E-1-4030VD04	Schematic Diagram Diesel Generator Room 1A HVAC System Ventilation and Exhaust Fans Aux. Relays, Switches and Alarms Part II	L
20E-1-4030VD05	Schematic Diagram Diesel Generator 1A HVAC Sys. Diesel Oil Storage Room Exhaust Fans 1A and 1B 1VD02CA and 1VD02CB	L
20E-1-4030VD06	Schematic Diagram Diesel Generator 1B HVAC Sys. Diesel Oil Storage Room Exhaust Fans 1C and 1D 1VD02CC and 1VD02CD	L
20E-1-4030VD09	Schematic Diagram Diesel Generator Room 1B HVAC System Ventilation & Exhaust Fans Aux. Relays, Switches and Alarms Part II	L
20E-1-4030VD11	Schematic Diagram Diesel Generator 1A and Day Tank Room CO2 Fire Protection System Fire Damper Control	J
20E-1-4030VD12	Schematic Diagram Diesel Generator 1B & Day Tank Room CO2 Fire Protection System Fire Damper Control	J
20E-1-4507A	Internal and External Wiring Diagram Diesel Generator HVAC Local Control Stations HIS-VDO42	E
20E-1-4511B	Internal Wiring Diagram Diesel Generator Room 1A Vent System Local Control Panel 1VD01JA PT.2	G
20E-1-4511E	Internal-External Wiring Diagram Diesel Generator	T

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	From 1A Vent. System Local Control Panel 1VD01JA Part-5	
D-10239	Schematic for A/DV Self Contained Hydraulic Actuator	H
M-136, Sheet 2	Diagram of Safety Injection	AF
M-152, Sheet 20	Control Diagram Starting System and Alarms	G
M-2097	HVAC/C&I Diagram Diesel Generator Room Ventilation System-VD, sheet number 6	E
M-4097-1VD05	Control Logic Diagram Diesel Oil Storage Room Vent Fan Control	C
M-61, Sheet 2	Diagram of Safety Injection	AJ
M-97	Diagram of Diesel Generator Rooms 1A & 1B Ventilation System	W

MODIFICATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
EC 374070	Diesel Generator Governor Booster	1
EC 385013	Add Redundant Isolation Valves in Series with 2SI8801 A/B	0
EC 388473	Install Time Delayed Auto-Restart for U-1 VE Fans in Support of HELB Mitigation Strategy	1
EC 388475	Install Time Delayed Auto-Restart For U-1 VD Fans in Support of HELB Mitigation	2
EC 389506	Install High Temperature Trip for DOST Ventilation Fans	3
EC377536	2A CV Pump Impeller Replacement	0
EC383595	Incorporate NPSH Required for Replacement Impeller for the 2A CV Pump into the NPSH Analysis from the RWST	0

PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
1BwEP-1	Loss of Reactor or Secondary Coolant Unit 1	205
1BwOS XLE-R1	Unit One Locked Equipment Surveillance	26
1BwOSR 3.8.1.2-1	1A Diesel Generator Operability Surveillance	35
2BwEP-1	Loss of Reactor or Secondary Coolant Unit 2	205
2BwOS XLE-R1	Unit Two Locked Equipment Surveillance	22
BwAR 1-17-B13	Alarm Response Procedure for CW Pump dP Low	13
BwAR 1-17-D13	Alarm Response Procedure for Intake Bay Level	10
BwAR 1-17-E13	Alarm Response Procedure for Traveling Screen Trouble	8
BwOP MS-5	MSIV Accumulator Operability Check	29
BwOP SI-M1	Operating Mechanical Lineup Unit 1	23
BwOP SI-M2	Operating Mechanical Lineup Unit 1	22
MA-AA-716-025	Scaffold Installation, Modification, and Removal Request Process	9
MA-AA-716-040	Measurement and Test Equipment Evaluation	8

OTHER DOCUMENTS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
PP-CV-5	IST Evaluation CV Pump New Ref Values	July 28, 2010
WO 10450738 14	Add Isolation Valves Upstream of 2SI8801A&B	October 29, 2012
WO 1314278	1LS-WF025 Essential Service Water Sump Level Switch	June 21, 2013
WO 1538365	Thermal Performance Test at Start of Outage	October 8, 2013
WO 1566935 10	CE Perform MOD Testing per CC-AA-107 ATT 1 EC 389506	March 15, 2013
WO 1566935 11	IM Bench Cal Temp Switches per EC 389506 OAP (HAMMOCK) Testing per CC-AA-107 ATT 1 EC 389506	December 8, 2012
WO 1566937 24	IM – 1TS – VD002B Calibrate per EC 289506	August 29, 2013
WO 384197	SEP Pump Curve/Full Flow Test	October 26, 2009

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CDBI	Component Design Basis Inspection
CFR	Code of Federal Regulations
CS	Core Spray
CSAT	Containment Spray Additive Tank
DG	Diesel Generator
DOST	Diesel Oil Storage Tank
EC	Engineering Change
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
FASA	Focused Area Self-Assessment
FIN	Finding
GL	Generic Letter
HELB	High Energy Line Break
HVAC	Heating, Ventilation, and Air Conditioning
HX	Heat Exchanger
IMC	Inspection Manual Chapter
IST	Inservice Testing
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
MSIV	Main Steam isolation Valve
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NPSH	Net Positive Suction Head
NRC	U.S. Nuclear Regulatory Commission
PARS	Public Available Records System
RHR	Residual Heat Removal
SDP	Significance Determination Process
SI	Safety Injection
UFSAR	Updated Final Safety Analysis Report
WO	Work Order

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

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