UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

January 2, 2020

Mr. Frank Payne
Site Vice President
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
Reg Affairs–A210
10 Center Road, P.O. Box 97
Perry, OH 44081–0097

SUBJECT: PERRY NUCLEAR POWER PLANT – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000440/2019010

Dear Mr. Payne:

On November 21, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your Perry Nuclear Power Plant and discussed the results of this inspection with Mr. B. Blair and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed the station's corrective action program and the station's implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for corrective action programs. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

The team also evaluated the station's processes for use of industry and NRC operating experience information and the effectiveness of the station's audits and self-assessments. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

Finally the team reviewed the station's programs to establish and maintain a safety-conscious work environment, and interviewed station personnel to evaluate the effectiveness of these programs. Based on the team's observations and the results of these interviews the team found no evidence of challenges to your organization's safety-conscious work environment. Your employees appeared willing to raise nuclear safety concerns through at least one of the several means available.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Billy C. Dickson, Jr., Chief
Branch 2
Division of Reactor Projects

Docket No. 05000440
License No. NPF-58

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Frank Payne from Billy C. Dickson dated January 2, 2020.

SUBJECT: PERRY NUCLEAR POWER PLANT – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000440/2019010

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	05000440
License Number:	NPF-58
Report Number:	05000440/2019010
Enterprise Identifier:	I-2019-010-0049
Licensee:	FirstEnergy Nuclear Operating Company
Facility:	Perry Nuclear Power Plant
Location:	Perry, OH
Inspection Dates:	November 03, 2019 to November 21, 2019
Inspectors:	V. Meghani, Reactor Inspector J. Park, Reactor Inspector J. Rutkowski, Project Engineer
Approved By:	Billy C. Dickson, Jr., Chief Branch 2 Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a biennial problem identification and resolution inspection at Perry Nuclear Power Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – BASELINE

71152B - Problem Identification and Resolution

Biennial Team Inspection (IP Section 02.04) (1 Sample)

(1) The inspectors performed a biennial assessment of the licensee's corrective action program, use of operating experience, self-assessments and audits, and safety conscious work environment.

- Corrective Action Program Effectiveness: The inspectors assessed the corrective action program's effectiveness in identifying, prioritizing, evaluating, and correcting problems. The inspectors also conducted a five-year review of the reactor recirculation system (B33). The inspectors also reviewed the corrective actions, open at the time of completion of the documented IP 95001 Supplemental Inspection (ML18080B212), dated 03/27/2018, associated with a White NOV in the Mitigating Systems Cornerstone. The inspectors verified these corrective actions had been completed as scheduled.

- Operating Experience, Self-Assessments and Audits: The inspectors assessed the effectiveness of the station's processes for use of operating experience, audits and self-assessments.

- Safety Conscious Work Environment: The inspectors assessed the effectiveness of the station's programs to establish and maintain a safety-conscious work environment.

INSPECTION RESULTS

Assessment	71152B
Assessment of the Corrective Action Program Based the activities that were selected for review, the inspection team concluded that implementation of the problem and identification process (the corrective action program) was adequate to appropriately protect the health and safety of the public and the environment. The plant staff had a low threshold for identifying problems and entering them, in a timely manner, in the condition report (CR) system. Items once entered into the corrective action program (CAP) were screened and prioritized in a timely manner using established criteria; were properly evaluated commensurate with their safety significance; and corrective actions	

were generally implemented in a timely manner, commensurate with the safety significance. The team noted that licensee reviewed Operating Experience (OE) for applicability to station activities. Audits and self-assessments seemed to be performed at an appropriate level to identify deficiencies. In interviews conducted during the inspection, most workers at the site expressed freedom to bring up nuclear safety concerns and were encouraged to enter items in CAP system.

Effectiveness of Problem Identification

The inspection team found that issues were being identified and captured in the CR system or the work order system. Station personnel write about 250 to 300 CRs per month with most not being of high safety significance. Usually only 1-3 CRs per month merit a causal evaluation per the CAP requirements. Interviews conducted by the inspection team indicated that personnel knew the licensee procedural requirement and expectation to write CRs for issues and plant personnel usually did write CRs. In several interviewed groups personnel said they regularly passed issues on to supervision and supervision wrote the CRs. Several personnel in interviewed groups said that they felt the CAP was ineffective for less than large or nuclear safety issues. That observation appeared consistent with the licensee's 2018 and 2019 Safety-Conscious Work Environment surveys. The inspectors did not identify any specific issues where it was clear that people should have written CRs and did not.

The team noted that some deficiencies were identified by external organizations, including the NRC, that had not been previously identified by licensee staff and were subsequently entered into the CAP. The team found that the licensee utilized several CAP support processes to identify problems, including the self-assessment and audit process and the Operating Experience Program. The licensee performed adequate department self-assessments and quality assurance audits to identify issues in station processes. Similarly, the licensee screened issues from both NRC and industry operating experience and entered them into the CAP when they were applicable to the station.

The team determined that the licensee was generally effective at trending low level issues and taking appropriate corrective actions to prevent more significant issues from developing. Trends for open CRs and work orders appeared reasonable. The licensee used the CAP to document instances in which previous corrective actions were ineffective or were inappropriately closed.

The team performed a 5-year review of the issues related to Reactor Recirculation System. As part of this review, the team interviewed the system engineer, reviewed condition reports, plant health reports, and condition evaluations. The team concluded that reactor recirculation concerns were identified and entered into the CAP at a low threshold and concerns were being resolved through appropriate corrective actions and action plans in a manner commensurate with their safety significance.

Effectiveness of Prioritization and Evaluation of Issues

Based on the samples reviewed, the team determined that licensee performance was adequate. The Management Alignment and Ownership meetings were generally thorough and intrusive in reviewing issues and prioritizing actions. The team observed a healthy dialogue between the members of these committees when dispositioning condition reports. The evaluations were generally completed in a timely manner.

Effectiveness of Corrective Actions

Based on the samples reviewed, the team determined that the licensee was adequately implementing corrective actions (CAs) with some licensee-identified opportunities for improvement in corrective action implementation. In general, corrective actions for deficiencies that were safety significant were implemented in an adequate and timely manner. The team sampled CA assignments developed for selected NRC documented violations, selected licensee event reports, some license self-assessments, and some licensee-identified issues. Where either enough time had elapsed, and/or the licensee had performed effectiveness reviews, the team also looked at the effectiveness of the corrective actions (i.e. was there a recurrence of the issues). While the team did not identify issues on the effectiveness of corrective actions, the team was aware that the licensee and an external organization had identified some issues with the effectiveness of corrective actions. The licensee's Nuclear Safety Culture Monitoring Panel had also indicated that safety culture trait PI.3 (timely and effective CA) along with trait WP.4 (procedure adherence) were areas that need improvement.

Assessment	71152B

Use of Operating Experience

Based on the samples reviewed, the team determined that licensee performance in the use of OE was adequate. The licensee screened industry and NRC OE information for station applicability. Based on these initial screenings, the licensee initiated actions in the CAP to fully evaluate the impact, if any, to the station. When applicable, actions were developed and implemented in a timely manner to prevent similar issues from occurring. The OE lessons-learned were communicated and incorporated into plant operations.

The licensee maintains control of the OE review activity under the station operating experience process per NOBP-LP-2100. The 10 CFR Part 21 review activity is controlled under the station Vendor Manuals (VMs) and Vendor Technical Information (VTI) program per NOP-CC-1003 that governs the receipt, review, approval, and control of the VMs and VTI. Various OE databases were being utilized to gather the applicable OE items and screened through the licensee's collegial meetings. The screened issues are dispersed to the departments knowledgeable in the subject matter and are evaluated to determine the course of actions as deemed appropriate.

Assessment	71152B

Self-Assessments and Audits

The inspectors deemed assessments for selected areas of review were thorough and intrusive with regards to following up with the issues that were identified both through previous NRC inspections and fleet oversight audits. Corrective actions of the identified issues were deemed reasonable and completed commensurate with safety significance. The inspectors regarded licensee performance as adequately self-critical of their own performance, and that performance-related issues are being identified through their self-assessment process. However, some corrective actions did not always result in performance improvement.

An audit of Operations performance conducted by Fleet Oversight during April and May 2018 concluded Perry was effective in Configuration Control. The 4th quarter Integrated

Performance Assessment (IPA) in 2018, however, identified a site-wide issue involving licensed and non-licensed operators not identifying and resolving configuration management issues prior to internal/external oversight identification. Fleet Elevation Letter was issued on November 30, 2018, on Operator Engagement. The plant established corrective actions and criteria to close this gap. The gap was subsequently closed; however, the station has experienced plant issues again due to configuration control performance. Subsequent issuance of Fleet Escalation Letter on May 2, 2019, on Operator Engagement resulted in generation of another condition report, resulting in series of corrective actions for improvement. The final effectiveness review of the corrective actions in September 2019 determined that the actions were effective with improvement noted in operator performance. While the inspectors noted that the station continues to be self-critical with their performance assessment, it remains to be determined if a sustained improvement is achieved in the area of configuration management.

Assessment	71152B

Safety Conscious Work Environment

As part of inspection, the inspectors interviewed or talked to approximately 40 – 45 people in small focus groups of people and in one-on-one or small group short discussions. The major area of focus was to ascertain if employees were free to bring up issues without fear of retaliation. An additional area of focus was to understand why up to 25-30 percent of employees in several departments did not give a favorable rating to the effectiveness of CAP or the Employee Concerns Program (ECP) in the licensee's 2018 and 2019 Safety-Conscious Work Environment (SCWE) surveys. Several people stated that while the CAP worked for important items, they believed it did not work well for lesser items or sometimes for items that were important to them. All interviewed personnel, when specifically asked the question, stated that they would discuss and have discussed issues with their supervisors and would bring up all nuclear safety issues.

Employee Concerns Program

As part of the overall SCWE inspection effort, the inspectors reviewed the ECP program logs and three case files. No items of concern were identified. The inspectors looked at logs for ECP back through 2018 and reviewed three files. The files reviewed appeared comprehensive. Also, during the interviews employees generally said that if they could not get issues addressed through their supervision they might use the ECP. But when the interviewees were asked about the non-positive responses concerning ECP in the SCWE surveys, they stated they did not have answers other than possibly people have not seen published good results from the program and people usually just discuss concerns with their supervisors. The inspectors did not identify any issues with the ECP.

Observation: Equipment Trends/Issues	71152B

The inspectors reviewed equipment, CAP, procedure change, and work order system trends and backlogs. The inspectors considered reviewed trends and backlogs as reasonable and generally consistent with available information on industry norms.

The inspectors identified in the CAP three open CAs greater than two years old. Two of those CAs are related to root cause evaluations stemming from drywell leakage issues. The remaining CA deals with probable maximum flooding. All three CAs involve inherently complex issues requiring long-term solutions to close the actions. Compensatory actions are

in effect while the long-term solutions are being implemented.

The inspectors reviewed the Reactor Recirculation System maintenance rule status. The system has been in maintenance rule status (a)(1) since 2016 and is expected to be returned to (a)(2) status after the 2021 refueling outage. The system experienced several issues with leakage and control problems since originally being placed in (a)(1) status. The inspectors reviewed the plans for restoring the system to (a)(2) and concluded the plans appeared reasonable. The inspectors did note that the licensee only had two other systems in maintenance rule (a)(1) status at the time of the inspection.

The inspectors reviewed an adverse trend that existed with regards to hydramotor failures. The same model of the subject hydramotor exists in multiple systems, including Diesel Generator Ventilation Systems, Emergency Service Water Pumphouse Ventilation System, Annulus Exhaust Gas Treatment System, and Nuclear Closed Cooling System. The hydramotor issue is from an inadequate bearing design, which could result in failure prior to the advertised design life. The station experienced failure of the hydramotor installed in Division 3 Diesel Generator Outside Suction Damper in year 2011, 2015, and 2019. The station appropriately considered OE from a similar issue that occurred at another plant and assessed the Part 21 implication of this issue. Following the 2019 failure, the hydramotor with an upgraded design of the bearing was installed; the station is managing other hydramotors of the same design through regular preventative maintenance intervals prior to any replacement with the upgraded bearing design.

Observation: Department Interactions in Supporting Plant	71152B

The inspectors, as part of the inspection, reviewed interactions between and among departments that could affect the effectiveness of the CAP. The inspectors concluded that normally departments worked with each other to support the safe operation of the plant. The inspectors did identify a few cases where there were different views on causal analyses and actions taken during outages. The inspectors concluded that the differences were discussed and final results generally agreed to by interested parties but some of the decisions made could have left some individuals dissatisfied. The inspectors, in reviewing documentation of issue resolutions where there were some differing views, concluded that the documentation appeared thorough and results reasonable.

Engineering, Maintenance, and Operations departments were involved in an operability evaluation for the essential service water B Pump due to a suspected oil leak on the pump upper bearing (CR2018-06921). Operations personnel obtained information on operator rounds, time it takes to get to the field, time needed to fill the oil, the type of oil being filled, etc. Consideration of pump functions and maintenance required consultation with the pump vendor and site Maintenance department for estimation of oil leak rate and identification of oil type. The final evaluation by Engineering required consideration for accident conditions and resultant dose consequences if oil needed to be added to the pump. Inspector review of this operability evaluation did not identify any deficiencies with regards to interactions with other departments or the final conclusions.

The control of temporary shielding to limit radiation exposure is governed by the station temporary shielding program per Procedure RPI-0122 and requires cooperation between at least Engineering and Radiation Protection departments. The shielding program, in part, requires review of the extra loads imposed by the shielding and its effect the affected system, structure, and equipment. The inspectors reviewed the temporary shielding package samples and did not identify any performance deficiencies associated with control of the

temporary shields in the plant. The inspectors also noted that, for a number of temporary shields that were converted to permanent shields, appropriate reviews had been performed by Engineering, including their effects to the systems and structures and regulatory reviews, such as the 10 CFR 50.59 reviews, to determine acceptability and compliance in accordance with their governing configuration change process.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On November 21, 2019, the inspectors presented the biennial problem identification and resolution inspection results to Mr. B. Blair, General Manager, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152B	Calculations	0P42-0111	Self Weight Excitation Review of Hangers for Emergency Closed Cooling System	9
		EQ-115	Qualified Life Calculations for Weed RTD/RTDT & TC Assemblies	4
	Corrective Action Documents	CA2016-14456-13	Provide Lessons Learned in Supervisor Continuing Training	12/19/2016
		CA2016-14456-15	Perform a Self-Assessment of the Attached List of Safety Related and Augmented Quality Design Changes	12/19/2016
		CR2017-08986	Emergency Closed Cooling Pipe Support 1P42H1080 Calculation Lacks Necessary Details	08/30/2017
		CR2017-09043	Inadequate Justification Provided in Calculation 0P42-0111 A-02 Regarding Impact on an Attached Beam Lacks Detail	08/31/2017
		CR2017-09684	Adverse Trend - Shortfalls in the Application of Maintenance Fundamentals Have Contributed to Some Recent Operational Challenges	09/20/2017
		CR2017-10421	Maintenance Program Station Identified Finding (SIF)	10/13/2017
		CR2017-10760	Trend Identified an Increase of the Containment Atmosphere Particulate Radiation Monitor Readings Nearing the Alert Level	10/25/2017
		CR2017-11375	2017 NRC PI&R Inspection: RP Did Not Perform the 2017 Second Quarter Survey for ISFSI Pad	11/13/2017
		CR2018-00383	Site Projects Section was Rated RED for the 2017 SCWE Survey Pillar 3	01/16/2018
		CR2018-01236	Finding: MS-C-18-01-13 Maintenance Rule Assessments Not Completed	02/12/2018
		CR2018-02613	Fleet Oversight Rejection of Initial Response CR2018-01236	03/19/2018
		CR2018-03157	Division 1, 2, and 3 DG Start and Load Surveillance Acceptance Criterions Was Not Updated When License Amendment 177 Went Effective	04/05/2018
		CR2018-03345	Technical Specification Surveillance Requirement Inconsistencies Identified in SVI-M16-T0414	04/12/2018
		CR2018-04561	NRC Identified: Transient Combustibles in a Combustible Control Zone	05/16/2018

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		CR2018-04568	Combustible Control Zone on Aux Building 574' Elevation Exceeded PAP-1910 Quantities	05/16/2018
		CR2018-06287	NRC EQ DBAI: Revise Qualified Life for the Weed Temperature Transmitters in AFP E596-000-01	07/12/2018
		CR2018-07647	NRC NCV – Failure to Control Transient Combustible Materials in a Designated Combustible Control Zone	08/27/2018
		CR2018-07735	Sump Level Monitoring Switches Credited for Flooding Analysis are not Functionally Checked on a Regular Basis	08/29/2018
		CR2018-08510	Div 1 DG Trip while Paralleling to the Grid	09/26/2018
		CR2018-08686	Failure to Correctly Establish Maintenance/Replacement Frequency for the Weed Temperature Transmitters in Zone FB-7	10/03/2018
		CR2018-08694	Aggregate Review of Perry Site Incidents Related to Human Performance and Leadership Engagement of Workforce Fundamental Behaviors	10/03/2018
		CR2018-10489	Unexpected HPU A Flow Control Valve Lockup	11/27/2018
		CR2019-01522	Failure to Perform Preventative Maintenance on Non-Safety, Structures, Systems, and Components	02/12/2019
		CR2019-01523	NRC NCV - Failure to Follow Procedures Results in Inoperable Division 1 Diesel Generator	02/12/2019
		CR2019-01557	Gap Identified in Preparation of Work Management Products and Trait WP	02/20/2019
		CR2019-01558	Problem Identification and Resolution Trait PI was an Area in Need of Improvement	02/20/2019
		CR2019-02676	PA-PY-19-01:Elevation - Gaps in Perry Refuel Floor Performance	03/22/2019
		CR2019-02775	Fill Port Plug Missing on Snubber 1B33G7068B	03/25/2019
		CR2019-02870	Fleet Observations - Use of CAP to Drive Action to Close Performance Gaps	03/27/2019
		CR2019-04615	Reactor Recirc A Pump Seal #2 Pressure Continues to Rise	05/22/2019
		CR2019-04848	Reactor Recirculation Flow Control Valve 'A' Locked Up	06/02/2019
		CR2019-04868	Refueling Services Human Performance Three Outage Trend	06/03/2019
		CR2019-05195	Reactor Recirc System (B33) Exceeded Maintenance Rule Condition Monitoring Goals	06/13/2019
		CR2019-05880	Adverse Trend – Division 3 Outside Suction Damper	07/11/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			(1M43F0020C) Hydramotor Failures	
		CR2019-05909	CR to Document System B33 (Reactor Recirc) Red Status per NOBP-ER-3009	07/12/2019
		CR2019-06618	Entered ONI-N36 Loss of Feedwater Heating and ONI-C51 due to Heater 5B Isolation	08/06/2019
		CR2019-07309	WP.4 Trait was an Area in Need of Improvement	09/03/2019
		CR2019-07381	Gap Identified in Problem Identification and Resolution Specifically in Area PI.3	09/05/2019
		ER2016-14456-1	Effectiveness Review Plan for Verifying no New Diode Failures	02/15/2017
		ER2016-14456-2	Effectiveness Review Plan for Design Changes that Involve Electrical and/or Instrument and Control Changes	03/27/2017
	Corrective Action Documents Resulting from Inspection	ATA2019-14841	NRC PI&R Observation: Maintenance Rule Preventable Functional Failure Performance Criteria Review for C91/C95	11/20/2019
		CR2019-09420	2019 NRC P&IR Inspection: FCV Lock Up resolution	11/06/2019
		CR2019-09464	2019 NRC PI&R Inspection: Licensee Identified Finding for Maintenance Rule Assessments not in Compliance with the Requirements of 10CFR50.56	11/08/2019
	Miscellaneous	ER2017-04001-1	Effectiveness Review - Chemical Control Program Compliance Deficiencies	05/19/2017
		ER2017-04001-2	Effectiveness Review - Chemical Control Program Compliance Deficiencies	05/19/2017
		ER2017-09684-2	Effectiveness Review - Corrective Action Plan Developed and Implemented for Adverse Trend in Application of Maintenance Fundamentals	08/15/2018
		ER2017-12121-1	FME Program Compliance	11/15/2018
		ER2018-08694-1	Effectiveness Review - Aggregate Review of Recent Perry Site Incidents Related to Human Performance and Leadership Engagement of Workforce Fundamental Behaviors	01/14/2019
		Integrated Performance Assessment	Operations Section, 2018-Q4	
		Integrated Performance	Operations Section 2019-Q2	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Assessment		
		MS-C-17-08-03	Fleet Oversight Audit Report - Radiation Protection/Radwaste	10/03/2017
		MS-C-18-03-01	Fleet Oversight Audit Report for Operations	05/04/2018
		MS-C-18-05-07	Fleet Oversight Audit Report - Maintenance / Work Management Program	06/22/2018
		MS-C-19-08-03	Fleet Oversight Audit Report - Radiation Protection/Radwaste	09/12/2019
		OE ATL-2019-0031-ATA-05	Part 21 – Snubber Hydraulic Fluid Batch Contains Particulates, Event No. 54001	05/13/2019
		OE ATL-2019-0031-ATA-06	Part 21 Event 54215 from Flowserve “NDE Performance of Components by an Unqualified Employee”	09/03/2019
		OE ATL-2019-0031-ATA-07	Review Part 21 and Fisher Information Notice 2019-01 In Regards to Loose Butterfly Valve Taper Pins	09/10/2019
		OE-2017-0561-1	IN1706, Battery and Battery Charger Short-Circuit Current Contributions to a Fault on Direct Current Distribution System	11/04/2017
		OE-2018-0100	IN1803, Operating Experience Regarding Failure to Meet Technical Specifications Requirements for Changing Plant Conditions	02/28/2018
		OE-2018-0109	IN1802, Testing and Operations-induced Degradation of 3-Stage Target Rock Safety Relief Valves	07/30/2018
		OE-2018-0263	IN1808, Failure to Enter the Required Technical Specifications Action Statement During Recent Surveillance Testing While Using a Reactor Protection System Test Box	06/20/2018
		OE-2018-0385	IN1811, Kobe Steel Quality Assurance Record Falsification	09/27/2018
		OE-2019-0122	IN1901, Inadequate Evaluation of Temporary Alterations	03/29/2019
		Shielding Authorization 03-020	B33 and G33 Shielding Package DW99	02/07/2003
		Shielding Authorization 18-015	AX574 G42 Piping Header	10/04/2018
		System Health Report 2019-01	System B33 Reactor Recirculation	07/26/2019
	Operability	CR2018-06921	Oil Leak from the Emergency Service Water Pump (ESW) B	08/06/2018

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Evaluations		Motor (1P45C0001B)	
	Procedures	NOBP-LP-2018	Integrated Performance Assessment	18
		NOBP-LP-2100	Operating Experience Process	20
		NOP-CC-1003	Vendor Technical Information	3
		NOP-ER-3004	FENOC Maintenance Rule Program	5
		NOP-LP-2001	Corrective Action Program	46
		NOPL-LP-2007	Nuclear Operating Policy - Corrective Action Program	2
		RPI-0122	Temporary Shielding Program	12
	Self-Assessments	SA-BN-2017-0776	Operation Action Plan Item 300.3 - Crews Support One Another as One Team	10/12/2017
		SA-BN-2018-0911	Perry Maintenance & Technical Training Follow-Up Assessment	12/07/2018
		SA-BN-2018-0935	Independent Assessment of Perry Maintenance Department Performance and Gap Closure Actions	09/10/2018
		SA-BN-2018-0993	Perry Maintenance Rule Assessment Cycle 16	04/06/2018
		SA-BN-2018-1015	RP Training Program Committee (TRP) Effectiveness	04/24/2018
		SA-BN-2018-1045	Assessment of Failure Effects Reviews Performed for Design Changes on MSPI Systems (CA-2016-14456-015)	07/20/2018
		SA-BN-2018-1055	RP Documentation Assessment	05/31/2018
		SA-BN-2019-1332	Perform a Self-Assessment of the Station Blackout Rule Implementation After All Action Are Completed	01/29/2019
		SA-BN-2019-1543	Maintenance Rule Periodic Assessment Cycle 17	07/24/2019
		SA-BN-2019-1682	2019 Mid-Year Semi-Annual Safety Culture Monitoring Panel	09/24/2019
	Work Orders	200783966	Remove, Fill, Test, and Install Snubber 1B33G7068B	03/28/2019
		200785278	Replace Temperature Transmitter 1M15N0021B	08/16/2019