

50-513/368/382
416/458



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

November 21, 1996

LICENSEE: ENTERGY OPERATIONS, INC.

FACILITY: Arkansas Nuclear One, Units 1 and 2
Grand Gulf Nuclear Station, Unit 1
River Bend Nuclear Power Station
Waterford Steam Electric Station, Unit 3

SUBJECT: SUMMARY OF NOVEMBER 14, 1996, MEETING ON AN ASSESSMENT OF
THE FINAL SAFETY ANALYSIS REPORTS FOR THE FACILITIES

A meeting was held on Thursday, November 14, 1996, between the Nuclear Regulatory Commission (NRC) staff and the licensee to discuss the results of the licensee's self assessments of the accuracy of the information in the Final Safety Analysis Reports (FSARs) for the four nuclear reactor sites. The meeting was held at the request of the licensee at NRC headquarters in Rockville, Maryland. A notice of this meeting was issued on October 8, 1996.

Attachment 1 is the list of attendees. Attachment 2 is the licensee's handout entitled "License Basis Assessments at Entergy Operations." There were no handouts by the staff. The meeting was for the staff to understand how the licensee conducted its self assessment of the FSARs and the results of the self assessment. No decisions were made during the meeting.

MEETING SUMMARY:

The agenda for the meeting is on page 2 of Attachment 2. The licensee's presentation was divided into (1) a discussion on the license basis assessments, including the methodology, the findings for the four facility sites, and the general observations from the assessments, and (2) the future design basis evaluation plans. The presentation by the licensee is discussed below and there are references made to pages in Attachment 2.

The licensee stated that the key elements describing the plant which affect the operating license for a nuclear power plant are the license basis, the design basis, and the operating basis for the plant. The key element that was new to the staff is the licensee's concept of the operating basis of the plant. The licensee defined the operating basis as the current operating procedures, practices, and processes for the plant. These elements were shown on page 7. The FSAR provides information on all three bases for the plant.

The licensee discussed changes to the license basis, design basis, and operating basis on pages 8 to 15. The licensee stated that the sequence of change is important in that a change to the license basis must be evaluated before implementing a design basis change, and a change to the design basis must be evaluated before implementing an operating basis change. The regulations require this and enforcing the sequence preserves the integrity of the license basis. The summary of the different change pathways is shown on page 11.

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On page 14, the licensee stated that its purpose for the self assessments was to determine if reasonable assurance existed to conclude that the license basis for each plant was sound.

The approach taken by the licensee in the self assessments are shown on pages 16 to 25. The assessments were in three phases: (1) review of the change processes defined in the regulations, including 10 CFR 50.54, 50.59, and 50.90; (2) review of the site change processes, including work-around lists, operations standing orders, and temporary alterations; and (3) a search for unknown change processes. The latter search was conducted by selecting four plant systems for each site and determining if the statements in the FSARs are accurate with respect to the current operating and design bases.

The staff asked why only four systems were chosen for review at each plant. The licensee stated that the four systems were not the same systems for each plant and four systems were sufficient to determine the weaknesses in the processes at the plants. The systems reviewed were listed on pages 30 (Arkansas Nuclear One), 33 (Grand Gulf), 37 (River Bend), and 41 (Waterford).

The licensee stated that these assessments were not conducted in a vacuum by themselves and there are numerous other activities being conducted at the plants that provide additional confidence in the license and design bases. These other activities are the following:

- The corrective action program for the plants
- The safety system functional inspections (SSFIs) and assessments (SSFAs) that are conducted at the plants
- Design basis documentation (DBD) efforts at the plants
- Responses to industry and NRC experience and events in terms of the design and operation of the plants

A list of SSFIs (conducted by the NRC) and SSFAs (conducted by the licensee) for each of the four plants from 1984 were shown on pages 21 and 22. The licensee's DBD efforts at each plant were listed on page 23.

How and when the assessments were conducted is shown on page 25. The licensee stated that the following were the overall results of the assessments:

- No safety significant discrepancies or operability issues were identified.
- With minor exceptions, existing site-specific license basis change processes are effective in maintaining the license basis.
- Non-traditional site change processes or mechanisms deserve additional controls to ensure accurate reflection in the license basis.
- The assessments created an enhanced site sensitivity to license basis changes for the plant.
- The three phase assessment process, in conjunction with previous efforts, is sufficient to determine reasonable assurance of license basis integrity for the plant.

The programmatic insights from the assessments, shown on page 27, were the following:

- Temporary changes (alterations, tag-outs, work-arounds) need to be periodically re-evaluated to determine if a permanent facility change should be proposed.
- Short-term operating basis changes (i.e., operations standing orders) need better controls to ensure screening under 10 CFR 50.59.
- Screening to identify potential changes to the license basis documents is not sufficiently comprehensive in all cases.

The plant-specific findings of the assessments for the four plants are shown on pages 28 to 42, in alphabetical order, from Arkansas Nuclear One (ANO) to Waterford 3. The acronym LBD means license basis determination and it is described in the FSAR.

The licensee briefly discussed the 10 CFR 50.54(f) letter sent by NRC to all licensees on October 9, 1996, regarding the adequacy and availability of design basis information at the nuclear power plants. The licensee stated that the self assessments were planned before June 1996, when the assessment for ANO began, in advance of the letter, and were not conducted to be a response to the 50.54(f) letter. The slide on this letter is page 45.

The presentation on the licensee's design basis evaluation plans are shown on pages 46 to 56. The licensee stated that the wide range of inputs to improve the DBD at the plants are the following: corrective actions program, self-assessments, NRC inspections and generic correspondence, Institute of Nuclear Power Operations (INPO) evaluations, industry experience, the licensee's peer groups, and plant walkdowns. The licensee stated that the DBD at the plants provides a sound basis for operations of the units; however, the upgrading of the DBD is an on-going process as the licensee's standards continue to rise, NRC expectations change, and current business plans reflect areas for enhancement at each plant. However, to gain greater confidence in the design basis integration at each plant, the licensee is planning team evaluations at each plant to evaluate each design area and develop recommendations. The team make-up and the target schedule for the evaluations are on pages 55 and 56. The questions to be explored at each plant are on page 53.

The licensee ended its presentations and the meeting was adjourned.



Jack N. Donohew, Senior Project Manager
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Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos.: 50-313, 50-368, 50-382,
50-416, and 50-458

Attachments: As stated

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ASSESSMENT OF FINAL SAFETY ANALYSIS REPORTS

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W. Beckner	NRC/NRR/PDIV-1
J. Donohew	NRC/NRR/PDIV-1
C. Patel	NRC/NRR/PDIV-1
D. Wiggington	NRC/NRR/PDIV-1
E. Wang	NRC/NRR/PGEB
J. Yelverton	EOI
F. Titus	EOI
J. Fisilaro	EOI
L. England	EOI
M. Meisner	EOI - Grand Gulf
D. Mims	EOI - ANO
R. King	EOI - RBS
K. Hughey	EOI - Grand Gulf
N. Chapman	Bechtel - SERCH
T. Pietrangelo	NEI

where:


ANO	= Arkansas Nuclear One
Bechtel	= Bechtel Power Corporation
EOI	= Entergy Operations, Inc.
NEI	= Nuclear Energy Institute
NRC	= Nuclear Regulatory Commission
NRR	= Office of Nuclear Reactor Regulation
DRPW	= Division of Reactor Projects III/IV
PDIV-1	= Project Directorate IV-1
PGEB	= Generic Issues and Environmental Projects Branch
RBS	= River Bend Station

License Basis Assessments

at

Entergy Operations

November 14, 1996



License Basis Evaluation

November 14, 1996

✦ **Introduction**

Jerry Yelverton


✦ **License basis assessments**

Mike Meisner

- **Elements affecting the license basis**
- **Developing an assessment approach**
- **Assessment findings**
- **Observations**

✦ **Design basis evaluation plans**

Fred Titus



Significance of the License Basis

The plant license basis establishes the scope of our contract with the public for safe nuclear generation.

While the language of the contract may, at times, be subject to interpretation, the responsibility lies with us to maintain or restore public and regulatory confidence in the contract and the integrity of the underlying license basis.



License Basis Issue

The key issue today is reduced public and regulatory confidence in the integrity of the license basis due to clear instances of licensees:

- Operating outside the license basis, and
- Failing to maintain the license basis

After examining this issue, EOI concludes:

- Current processes (with some exceptions) are effective in maintaining the license basis
- More detailed license basis reviews are warranted in selected areas

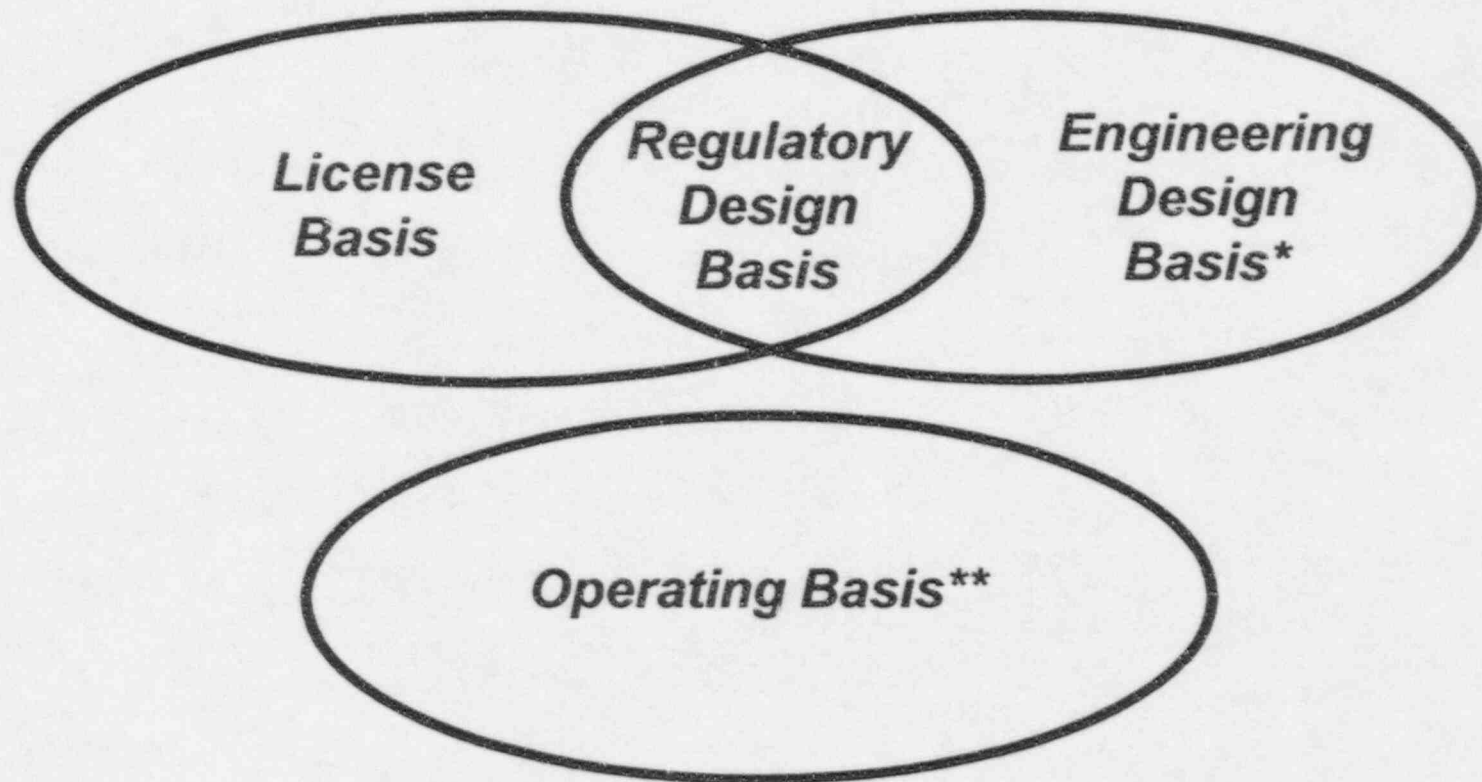


Confidence in the License Basis

- ♦ Understand the elements that can affect/change the license basis
- ♦ Develop an assessment approach that critically evaluates the process controls necessary to license basis integrity
- ♦ Through assessment, confirm the integrity of the processes governing change
- ♦ Implement process enhancements from lessons learned through assessment

Understanding Elements Affecting the License Basis

Key Elements



* Referred to as "Design Basis"
in the remainder of the presentation

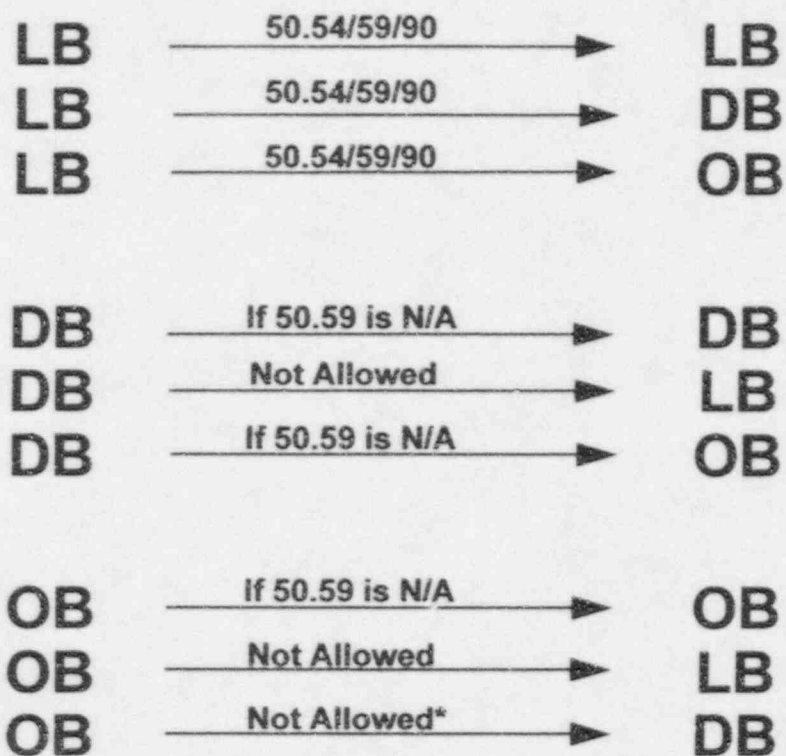
** Operating procedures, practices and processes



Changes Allowed by Regulation

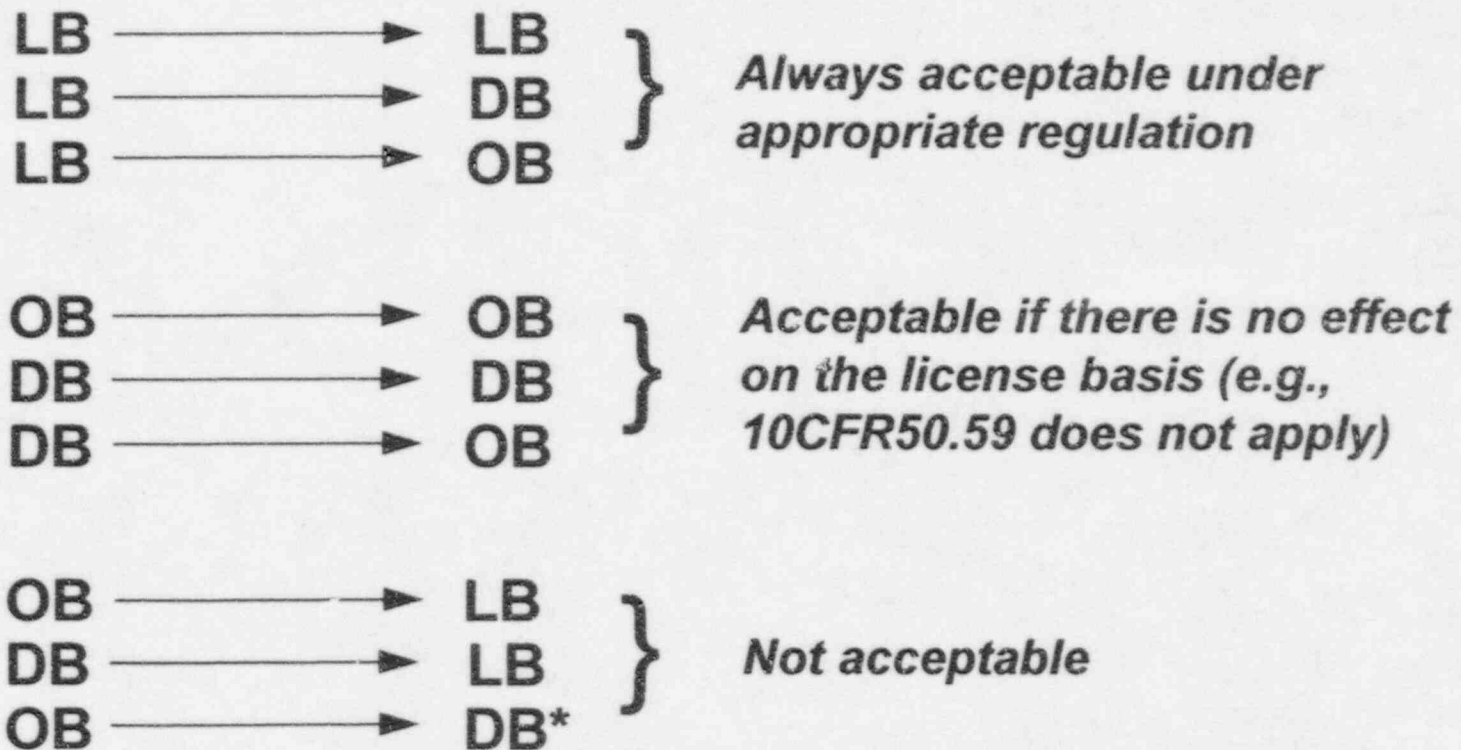
- ✦ Regulations allow for numerous means to change facility design/operation (most typical are 10CFR50.54/59/90)
- ✦ Sequence of change is inherent in regulations (e.g., a change to the license basis must be evaluated prior to implementing a change to the operating basis)
- ✦ Enforcing appropriate change mechanisms and sequences is the key to preserving license basis integrity
- ✦ Understanding the change mechanisms and sequences is the key to effective assessment of license basis integrity

Potential Change Pathways



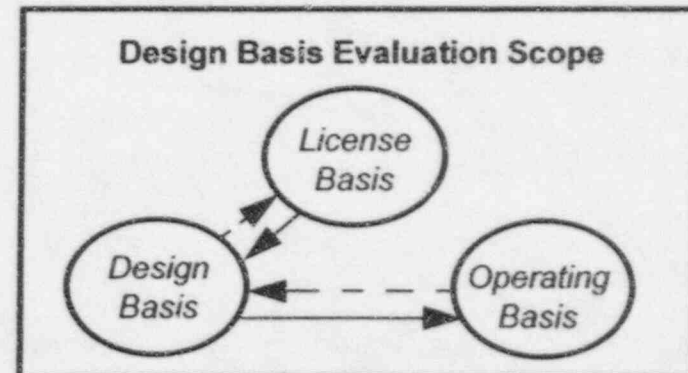
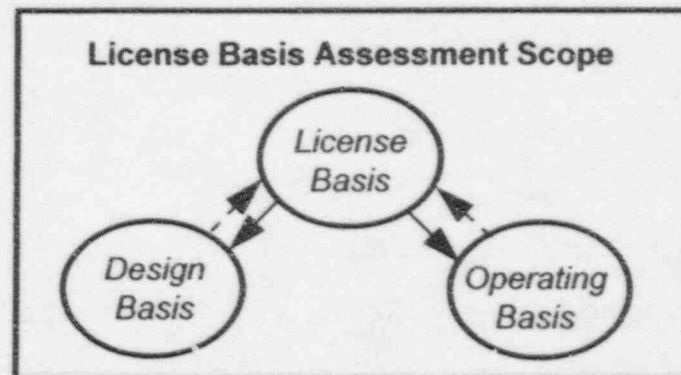
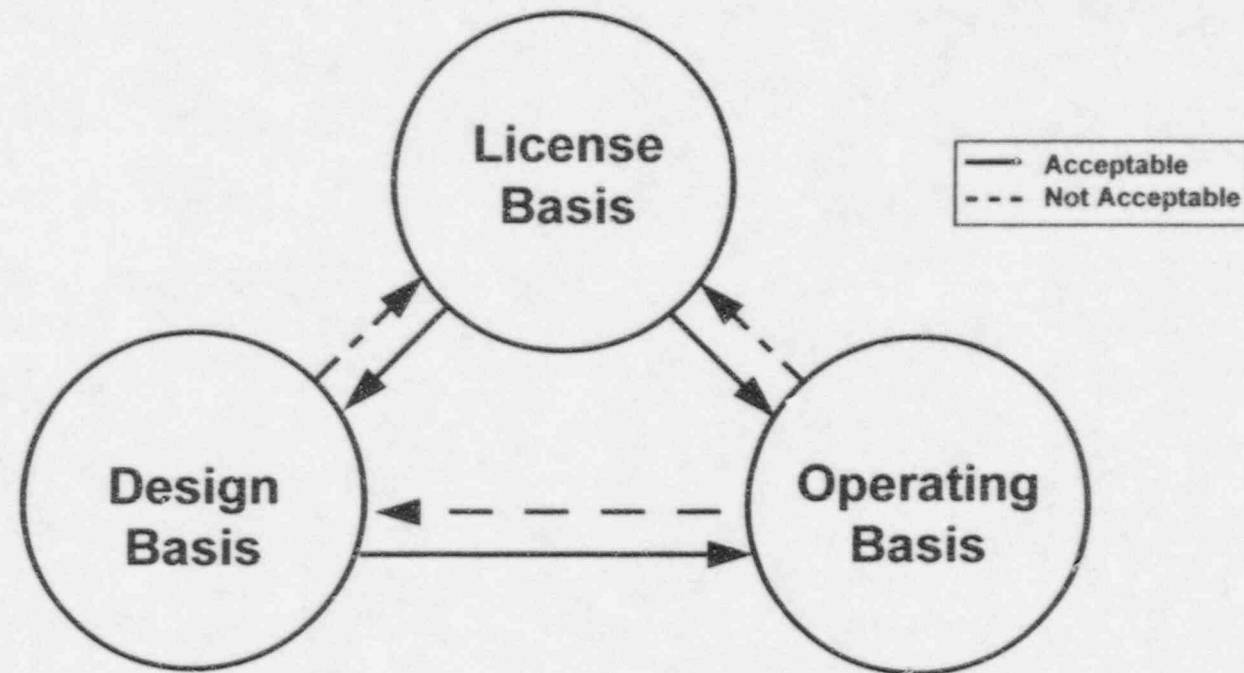
LB - License Basis
DB - Design Basis
OB - Operating Basis


Summary of Change Pathways



** Okay by regulation if there is no effect on the license basis, but not good engineering practice*

Summary of Change Pathways





Developing a License Basis Assessment Approach



License Basis Change Subtleties

- ✦ Multiple means are available to change operating practices, some of which seem to be lacking rigorous controls to reflect the change in the license basis
- ✦ Examples
 - Configuration changes which do not involve procedure or design basis changes
 - Untimely corrective action
 - Operator work-arounds



License Basis Assessment Purpose

Determine if reasonable assurance exists to conclude that the license basis is sound.

Reasonable assurance is based upon having a complete set of programmatic controls that ensure that changes to the operating and design bases are evaluated and reliably reflected in the license basis.

Assessment Focus Areas

Are license basis change processes working?

LB	→	LB	}	<i>Always acceptable under appropriate regulation</i>
LB	→	DB		
LB	→	OB		

OB	→	OB	}	<i>Acceptable if there is no effect on the license basis (e.g., 10CFR50.59 does not apply)</i>
DB	→	DB		
DB	→	OB		

Are there ways to change the facility without triggering license basis changes (i.e., are process controls missing)?

OB	→	OB	}	<i>Acceptable if there is no effect on the license bases (e.g., 10CFR50.59 does not apply)</i>
DB	→	DB		
DB	→	OB		

OB	→	LB	}	<i>Not acceptable</i>
DB	→	LB		
OB	→	DB		



Assessment Approach

A three-phased assessment is necessary to provide reasonable assurance of license basis integrity (review of the SAR alone is not sufficient). The assessment must cover:

- ✦ Effectiveness of processes that translate changes in the operating/design bases into changes in the license basis**
- ✦ Confirmation that known means of changing the operating/design bases have appropriate programmatic controls to reflect that change in the license basis**
- ✦ A search for unknown means to change the operating/design basis**

Assessment Phase 1

Change Process Review

Review examples of the following changes:

- ✦ 50.59
- ✦ 50.90
- ✦ FSAR changes
- ✦ Design changes not evaluated under 50.59
- ✦ Operating Procedure changes not evaluated under 50.59
- ✦ 50.54
- ✦ 50.55a
- ✦ Commitment additions

Review Scope

Does the license basis accurately reflect the change?

If not, what process steps are deficient or missing?



Assessment Phase 2

Known Change Processes

Review examples of the following:

- **Work-around list**
- **Operations standing orders**
- **Tech Spec positions**
- **Routinely “NAed” procedure steps**
- **Equipment operated in manual**
- **Old temporary alterations, non-conformances, tag-outs**

Review Scope

Is there a change from the license basis?

Are there adequate controls to capture license basis changes?



Assessment Phase 3

Search for Unknown Change Processes

Select four plant systems

Excerpt SAR statements associated with operational practices that could be changed and, in the presence of programmatic weaknesses, not be adequately reflected in the SAR

Review Scope

Determine if SAR statements are accurate with respect to current operating and design bases (overlaps the design basis evaluation scope)



Assessment Development

Other Considerations

- ✦ **The license basis assessments are not conducted in a vacuum**
- ✦ **Numerous previous activities provide additional confidence in both the license and design bases, principally**
 - **Corrective action program**
 - **Safety system functional inspections/assessments**
 - **Design basis documentation efforts**
 - **Response to Industry/NRC experience/events**

EOI SSFAs/SSFIs

ANO

U1 EFW (1986)
U1 DHR (1989)
125 VDC (U1/2, 1988)
U2 Elec. Dist. (1991)
U2 EDSFI (1991)
U1 Elec. Dist. (1992)
U1 EDSFI (1992)
U1/2 SW (1990)
U1/2 SW (1994)
U1/2 SWSOPI (1994)
Digital FW Control
(partial, 1995)

Grand Gulf

SLCS (1988)
FPC (1990)
EDSFI (1990)
HPCS/Div III EDG (1991)
LPCS/RCIC (1993)
SSW (1994)
ADS (1996)
RHR (partial) (1996)
SGTS (partial) (1996)
PSW (partial) (1996)

EOI SSFAs/SSFIs

River Bend

Instrument Air (1988)

SLCS (1990)

HPCS (1991)

LPCS/RCIC (1994)

SSW (1994)

Waterford 3

EFW (1984)

HVAC (1987)

CCW/ACCW (1988)

EDG (1990)

EDSFI (1991)

CVC/BAM (1992)

Safety Inj. (1993)

Software control (1994)

EFW (1995)

SSW (partial) (1995)

HPSI (partial) (1996)

EDG (partial) (1996)



EOI DBD Efforts

ANO

Design configuration documentation project (1986-1994);
Upper Level Documents (>120) covering systems,
structures and topical areas

Grand Gulf

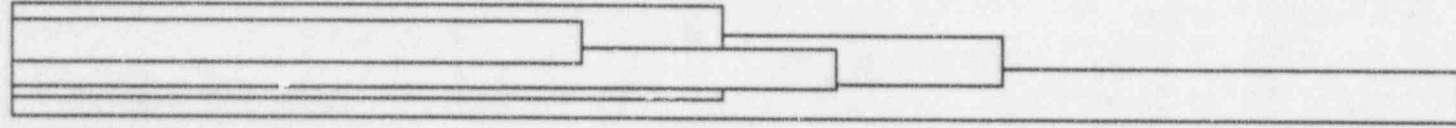
Detailed comparison with NUMARC 90-12 (1992) and
selected enhancements and upgrades

River Bend

Development of System Design Criteria Documents and
compilation of Analysis Basis Document in progress

Waterford 3

Design basis documentation project (1988 - 1994) covering
systems and structures



Assessment Findings




Assessment Conduct

- ♦ **Single team of knowledgeable representatives with diverse expertise from each EOI site**
- ♦ **Consultant knowledgeable in license basis issues**
- ♦ **Significant preparatory work at each site prior to team arrival**
- ♦ **Assessment schedule**
 - **ANO - 6/24-6/28, 7/10-7/12, 8/23**
 - **River Bend - 7/15-18, 8/19**
 - **Grand Gulf - 7/29-8/2**
 - **Waterford 3 - 8/12-8/16**



Overall Results

- ♦ **No safety significant discrepancies or operability issues were identified**
- ♦ **Existing site-specific license basis change processes are effective in maintaining the license basis (with some exceptions)**
- ♦ **Non-traditional change mechanisms deserve additional controls to ensure accurate reflection in the license basis**
- ♦ **Enhanced site sensitivity to license basis changes; SAR ownership and review becoming a natural activity**
- ♦ **The three phase assessment process, in conjunction with previous efforts, is sufficient to determine reasonable assurance of license basis integrity**



Overall Results

Programmatic Insights

- ✦ **Temporary changes (alterations, tag-outs, work-arounds) need to be periodically re-evaluated to determine if a permanent facility change should be proposed**
- ✦ **Short-term operating basis changes (i.e., operations standing orders) need better controls to ensure screening under 50.59**
- ✦ **Screening to identify potential changes to license basis documents is not sufficiently comprehensive in all cases**

Arkansas Nuclear One

Summary of Results

Arkansas Nuclear One Overview

- ✦ Traditional LBD change processes are effective in reflecting plant design/operating bases in the SAR
 - Exception: Cultural factors associated with perceived admin burden led to reluctance to initiate LBD changes in some cases. Reluctance did not appear to extend to safety significant changes.
 - Exception: LBD impact determinations have not been consistently comprehensive
- ✦ SAR review will be done for both units to meet current LBD expectations
 - Expect substantive SAR updates but not a substantive safety impact
 - Interim confidence in LBD adequacy based on extensive program upgrades such as DBD effort, system training manual upgrades, set point control, EQ, etc.

Arkansas Nuclear One Overview

- ✦ 53 SAR discrepancies requiring change
 - 22 due to quality of the change process
 - 16 operational/design changes at variance with SAR
 - 14 original SAR errors/ambiguities
 - 1 other variance
 - No safety significant or operability issues

- ✦ Systems reviewed

Unit 1

- Rx Bldg Spray
- DHR/LPI
- Main Steam
- Instrument/Service Air

Unit 2

- CVCS
- LPSI/SDC
- Main Steam
- Instrument/Service Air

Arkansas Nuclear One Programmatic Insights

Strengths

- ✦ Use of tagouts (hold cards) to enforce SAR administrative controls

Enhancements

- ✦ Establish site-wide focus on the importance of LBD accuracy
- ✦ Increase comprehensiveness of LBD impact reviews
- ✦ Formalize system abandonment process under the design change process
- ✦ Incorporate LBD impact review into “use-as-is” dispositions
- ✦ Periodically review longstanding temporary conditions (work-arounds, temp alts, etc.) for LBD impact

Grand Gulf

Summary of Results

Grand Gulf Overview

- ♦ Traditional LBD change processes are effective in reflecting plant design/operating bases in the SAR
 - Small number of identified discrepancies
- ♦ 11 SAR discrepancies requiring change
 - 6 original SAR errors/ambiguities
 - 3 operational changes at variance with the SAR
 - 2 design changes at variance with the SAR
 - No safety significant or operability issues
- ♦ Systems reviewed
 - RHR
 - Fire Water
 - Combustible Gas Control
 - Instrument Air



Grand Gulf Programmatic Insights

Strengths

- ✦ **Consistent accurate update of LBDs**
- ✦ **Comprehensive application of LBD impact screening for a range of engineering documents**

Enhancements

- ✦ **Periodically review longstanding temporary conditions (work-arounds, temp alts, etc.) for LBD impact**
- ✦ **Implement better controls for review of short term operating basis changes such as standing orders**
- ✦ **Additional enhancements based on design basis evaluation findings**

River Bend

Summary of Results

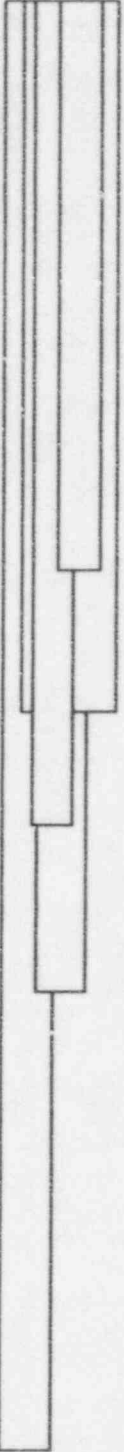
River Bend Overview

- ♦ Traditional LBD change processes are effective in reflecting plant design/operating bases in the SAR
 - Exception: LBD impact reviews are not consistently comprehensive
 - Exception: Old tech spec amendments (2 examples) were not reviewed for other LBD impact
- ♦ Most SAR discrepancies are original SAR errors
- ♦ Additional SAR verification activities planned or in progress include:
 - Development of System Design Criteria documents (including SAR validation)
 - Analysis (SAR Chapter 15) basis document review
 - Engineering SAR review



River Bend Overview

- ✦ 32 SAR discrepancies requiring change
 - 25 original SAR errors/ambiguities
 - 5 due to quality of the change process
 - 2 other variances
 - No safety significant or operability issues
- ✦ Systems reviewed
 - Emergency diesels
 - RHR
 - Instrument Air
 - Main Steam



River Bend Programmatic Insights

Strengths

- ✦ Process controls to evaluate LBD effect if equipment deficiencies are dispositioned “use-as-is”

Enhancements

- ✦ Periodically review longstanding temporary conditions (work-arounds, temp alts, etc.) for LBD impact
- ✦ Emphasize LBD impact review should include all SAR figures
- ✦ Implement additional controls to ensure that valid LBD change notices cannot be canceled

Waterford 3

Summary of Results



Waterford 3 Overview


- ✦ Traditional LBD change processes are effective in reflecting plant design/operating bases in the SAR
 - Exception: Partially completed design changes may not be incorporated in the SAR in a timely manner
 - Exception: While Security Plan changes are evaluated under 50.54 they do not receive a screening for other LBD impact
- ✦ 20 SAR discrepancies requiring change
 - 10 design changes at variance with SAR (5 due to partially implemented designs)
 - 8 original SAR errors (2) or ambiguities (6)
 - 2 other variances
 - No safety significant or operability issues



Waterford 3 Overview

♦ Systems reviewed

- DC distribution
- CVCS
- Main Steam
- Instrument air



Waterford 3

Programmatic Insights

Strengths

- ✦ **LBD review required for Operations Standing Instructions**
- ✦ **Broad LBD screening**
- ✦ **50.59 training emphasis on operations consistent with SAR**

Enhancements

- ✦ **Periodically review open temporary alterations, tagouts (clearances) and operator work-arounds for LBD impact**
- ✦ **Update LBD procedures to reflect current practice and resolve inter-departmental procedure inconsistencies**
- ✦ **Enhance review of incoming/outgoing regulatory correspondence for LBD effects**
- ✦ **Additional enhancements based on design basis evaluation findings**

Observations



FSAR

- ✦ The FSAR was constructed in accordance with the guidance of the SRP and RG 1.70 (or its predecessor documents)
- ✦ Many subsections of the SAR are narrowly constructed to address specific SRP issues rather than integrated safety scenarios
- ✦ This approach facilitates OL review for the specialist but inhibits understanding or leads to misunderstandings with inspectors
- ✦ Significant NRC and licensee resources are being consumed today in researching, explaining and understanding the SAR in a context, and for an audience, to which it is not well suited

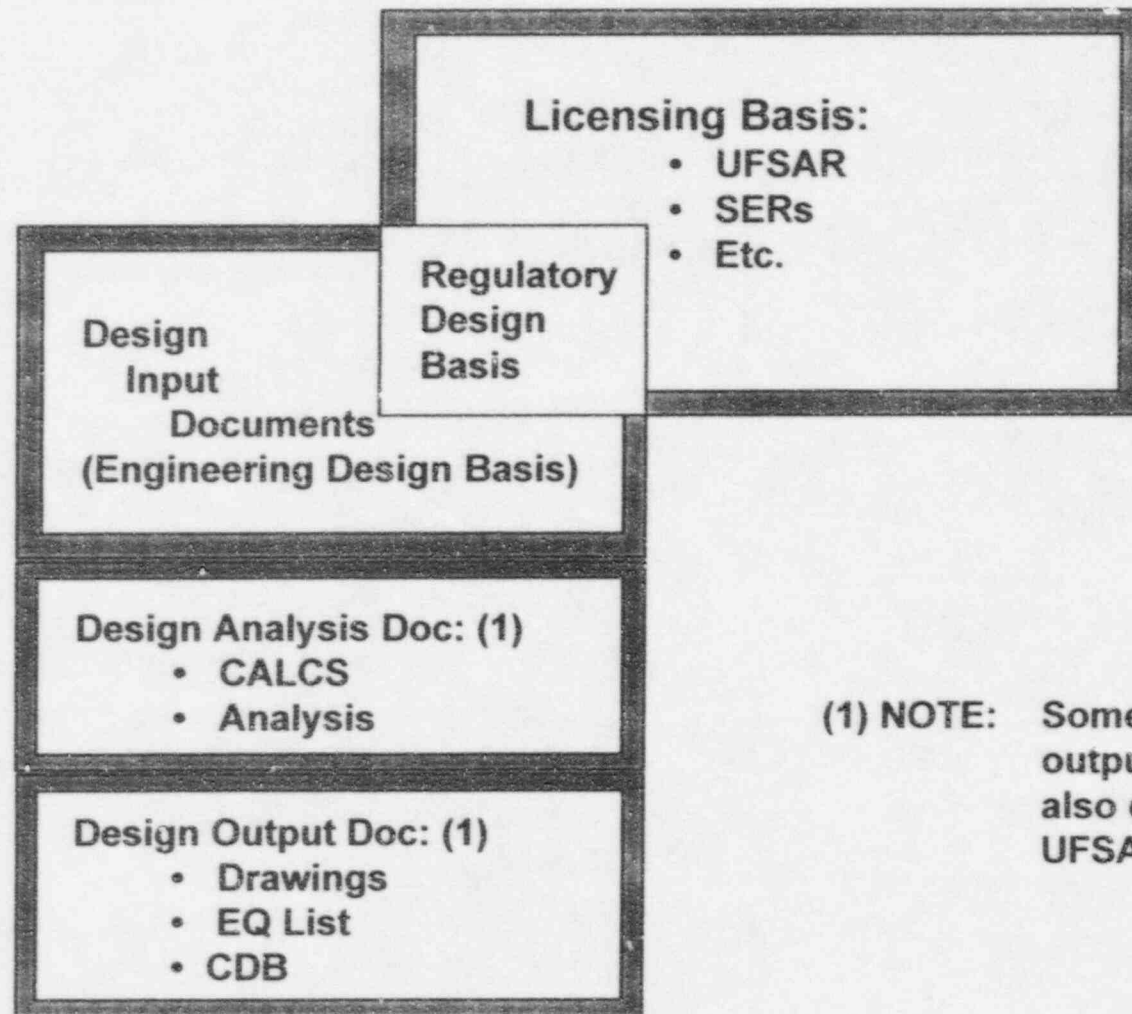


Design Basis 50.54(f) Letter

- ✦ **Has had an impact on, and clearly delivered a message to, the industry**
- ✦ **In practical terms, as with the SAR assessments, we must rely on our conclusions as to the quality of our processes to draw conclusions about the quality of the design basis**
- ✦ **“Reasonable assurance” should be the standard**
- ✦ **Safety performance should be the measure**

Design Basis Evaluation Plans

Design/Licensing Basis Relationship




(1) NOTE: Some analysis and output documents are also directly in the UFSAR




Entergy Engineering Philosophy

- ✦ **Accountability for the Design Basis**
 - No reliance on A/E
 - Limited NSSS support
- ✦ **Related Actions:**
 - Turnover of original design calcs/drawings
 - Technical capability:
 - ✦ Selection
 - ✦ Training/Development
 - Tools (examples):
 - ✦ Technical tools
 - ✦ Optical Disk Imaging/Retrieval System



What Has Entergy Done to Improve Design Basis Documentation?

- ♦ **Acted on opportunities for improvement**
- ♦ **Wide range of inputs:**
 - **Corrective Action Program**
 - **Internal Self-Assessments**
 - **NRC Inspections**
 - **INPO Evaluations**
 - **Industry Experience**
 - **NRC Generic Correspondence**
 - **Entergy Peer Groups**
 - **Walkdowns**




Example: Vertical Slice Type Assessments

✦ EO! Self-Assessments:	30
✦ NRC SSFI Type Inspections:	6

- ✦ These assessments/inspections have:
 - Confirmed safety functions would be performed
 - Identified opportunities to improve documentation

**In response, Entergy has made a significant
commitment to enhance design basis documentation**



Significant Upgrades have been Undertaken (Examples)

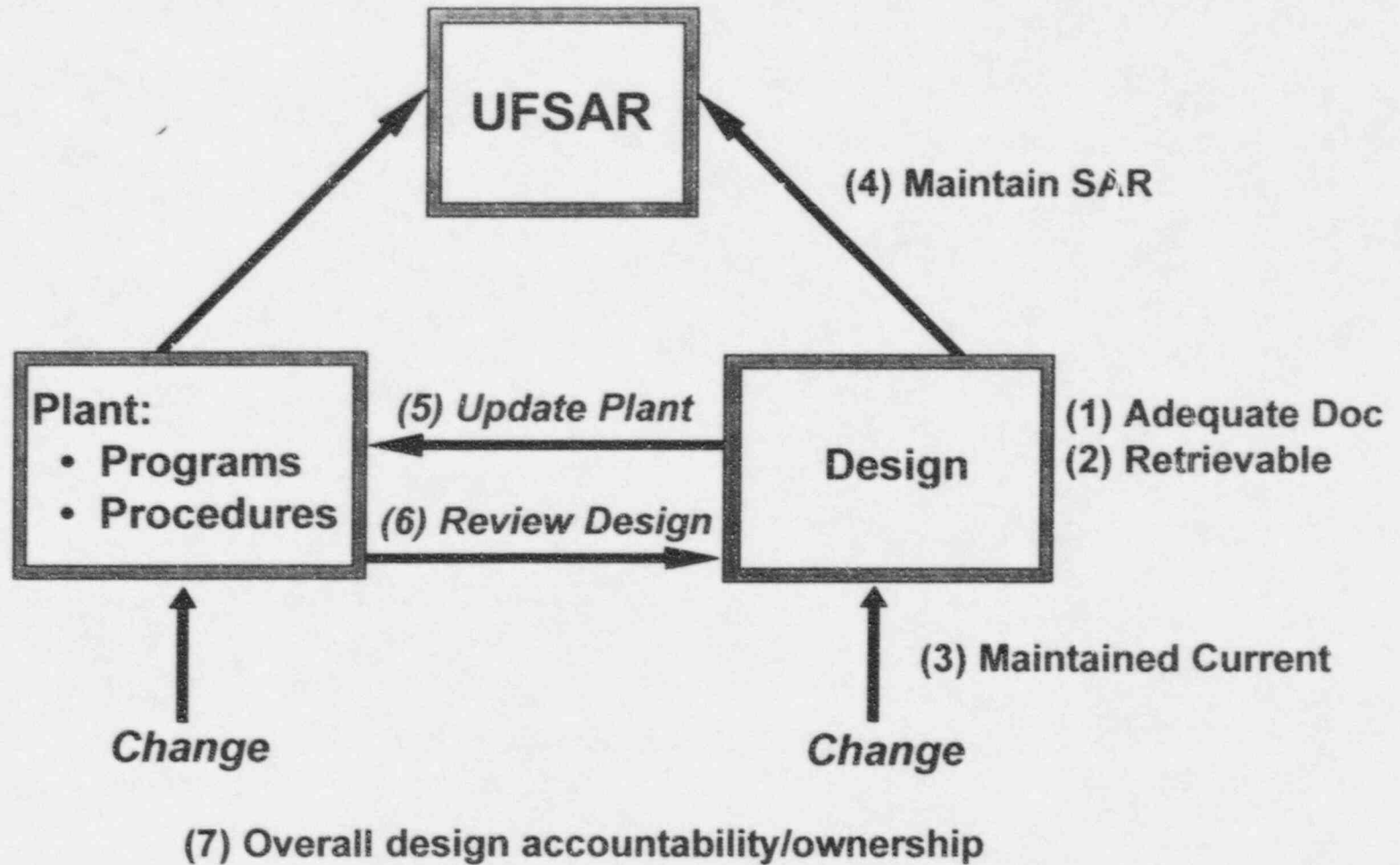
- ✦ **ANO Design Basis Reconstitution Effort**
- ✦ **All Sites (examples):**
 - **EQ Documentation**
 - **Seismic Documentation**
 - **Drawing/Configuration Control Upgrades**
 - **Electrical Design Calc Upgrades**
 - **System Level Design Criteria Documents**
 - **Change Process Improvements**
 - **IST Reconstitution**
 - **Component Data Base Upgrades**
 - **Instrument Setpoint Programs**
 - **MOV Design Basis**

Today's Perspective

- ✦ We believe the Design Basis Documentation at EOI provides a sound basis for operation
- ✦ However, upgrading Design Basis Documentation is an on-going process:
 - We continue to raise our standards
 - NRC expectations also change
 - Current business plans reflect areas for enhancement at each EOI site
- ✦ What can we do to gain even greater confidence in our Design Basis Integration?

**EOI Team Evaluation of
Design Basis Integration at Each Site**

Questions





Approach

- ✦ Team evaluations at each site
- ✦ Not a typical assessment
- ✦ Evaluate each design area:
 - Review discrepancies/findings
 - Review prior initiatives
 - Review planned initiatives
 - Interview subject area experts
- ✦ Develop specific recommendations

Team Make-Up

♦ Core Team:

- Team Lead (Management)
- Corporate Assessment
- Mechanical
- Civil/Piping
- Electrical
- I&C
- Safety Analysis

♦ Site Team (Supplements):

- Operations
- Maintenance
- Licensing

Target Schedule

ECD

- ♦ Initial Team Planning November 15, 1996
- ♦ Initial Evaluation (Waterford 3) December, 1996
- ♦ Complete all Evaluations March, 1997
- ♦ Follow-Up Action Plans April, 1997
- ♦ NRC Briefing April, 1997