



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

July 22, 2020

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

SUBJECT: COOPER NUCLEAR STATION – INTEGRATED INSPECTION
REPORT 05000298/2020002

Dear Mr. Dent:

On June 30, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Cooper Nuclear Station. On July 9, 2020, the NRC inspectors discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

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,

David L. Proulx, Acting Chief
Reactor Projects Branch C
Division of Reactor Projects

Docket No. 05000298
License No. DPR-46

Enclosure:
As stated

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COOPER NUCLEAR STATION – INTEGRATED INSPECTION REPORT 05000298/2020002 –
July 22, 2020

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 05000298

License Number: DPR-46

Report Number: 05000298/2020002

Enterprise Identifier: I-2020-002-0006

Licensee: Nebraska Public Power District

Facility: Cooper Nuclear Station

Location: Brownville, NE

Inspection Dates: April 1, 2020 to June 30, 2020

Inspectors: A. Siwy, Senior Resident Inspector
M. Stafford, Resident Inspector
R. Alexander, Senior Emergency Preparedness Inspector

Approved By: David L. Proulx, Acting Chief
Reactor Projects Branch C
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Cooper Nuclear Station, 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.

PLANT STATUS

Cooper Nuclear Station began the inspection period at rated thermal power. On May 19, 2020, the unit began a coast down to approximately 98 percent power, due to an administrative limit on reactor recirculation pump speed, prior to a planned rod sequence exchange. On May 29, 2020, the unit lowered power to approximately 70 percent for a control rod sequence exchange. The plant was returned to rated thermal power on May 30, 2020. On May 31, 2020, the unit lowered power to approximately 85 percent for a control rod sequence exchange. The plant was returned to rated thermal power on May 31, 2020. On June 12, 2020, the unit lowered power to approximately 80 percent for a control rod sequence exchange. The plant was returned to rated thermal power on June 13, 2020. On June 27, 2020, the unit lowered power to approximately 70 percent for a control rod sequence exchange. The plant was returned to rated thermal power on June 28, 2020, and remained at or near rated thermal power for the remainder of the inspection period.

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.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), resident inspectors were directed to begin telework and to remotely access licensee information using available technology. During this time the resident inspectors performed periodic site visits each week and during that time conducted plant status activities as described in IMC 2515, Appendix D; observed risk significant activities; and completed on-site portions of IPs. In addition, resident and regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Impending Severe Weather Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated the adequacy of the overall preparations to protect risk-significant systems from thunderstorms on May 18, 2020.

External Flooding Sample (IP Section 03.03) (1 Sample)

- (1) The inspectors evaluated that flood protection barriers, mitigation plans, procedures, and equipment are consistent with the licensee's design requirements and risk analysis assumptions for coping with external flooding.

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Reactor core isolation cooling on April 15, 2020
- (2) Reactor equipment cooling B on April 20, 2020
- (3) Residual heat removal service water booster pump D on April 23, 2020
- (4) Fire protection system hydrants on June 11, 2020

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated system configurations during a complete walkdown of the 24 Vdc electrical system on June 9, 2020.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Reactor building northeast quad, 881 foot and 859 foot elevations, on April 15, 2020
- (2) Control building basement on April 23, 2020
- (3) Intake structure on May 6, 2020
- (4) Control building battery and switchgear Room 1B on May 6, 2020
- (5) Control building reactor protection system motor generator set rooms on May 14, 2020

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (2 Samples)

The inspectors evaluated internal flooding mitigation protections in the:

- (1) Residual heat removal heat exchanger B Room, 931 foot elevation, on April 20, 2020
- (2) Service water pump room on June 1, 2020

71111.11Q - Licensed Operator Regualification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

- (1) The inspectors observed and evaluated licensed operator performance in the control room during downpower and rod pattern adjustment on May 30, 2020.

Licensed Operator Regualification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated the licensed operator regualification scenario on June 17, 2020.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components (SSCs) remain capable of performing their intended function:

- (1) Maintenance Rule a(3) periodic assessment on May 29, 2020
- (2) Drywell radiation monitor repeat failures on June 29, 2020

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) High pressure coolant injection maintenance window on April 16, 2020
- (2) Residual heat removal A subsystem maintenance window on May 1, 2020
- (3) Startup station service transformer maintenance window on June 26, 2020

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (8 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Residual heat removal heat exchanger B HELB door on April 20, 2020
- (2) FLEX 60 kW diesel generator functionality on May 4, 2020
- (3) Control rod drive mechanism temperature indication on May 5, 2020
- (4) Reactor building airlock door and secondary containment on May 13, 2020
- (5) Service water pipe thinning on June 2, 2020
- (6) Low bus voltage indication in control room on June 11, 2020
- (7) Core spray minimum flow valve environmental qualification on June 24, 2020
- (8) Flood barrier control hose routing on June 26, 2020

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following temporary or permanent modifications:

- (1) Spent fuel pool cooling isolation valves on May 7, 2020

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated the following post maintenance test activities to verify system operability and functionality:

- (1) High pressure coolant injection maintenance post-work testing on April 23, 2020
- (2) Standby gas treatment A post work testing on June 8, 2020
- (3) Startup station service transformer maintenance post work testing on June 26, 2020

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (2 Samples)

- (1) Division 2 emergency diesel generator monthly surveillance on May 11, 2020
- (2) Control rod scram time surveillance on May 30, 2020

FLEX Testing (IP Section 03.02) (1 Sample)

- (1) FLEX fuel transfer trailer surveillance on May 5, 2020

71114.04 - Emergency Action Level and Emergency Plan Changes

Inspection Review (IP Section 02.01-02.03) (1 Sample)

- (1) The inspectors evaluated the following Emergency Action Level procedure and Emergency Plan changes, of which summaries were submitted to the NRC per 10 CFR 50.54(q)(5) and 10 CFR 50.4.
 - Emergency Plan Implementing Procedure 5.7.1, Emergency Classifications, Revisions 60, 61, 62, 63, and 64
 - Cooper Emergency Plan, Revision 75

This evaluation does not constitute NRC approval.

71114.08 - Exercise Evaluation Scenario Review

Inspection Review (IP Section 02.01 - 02.04) (1 Sample)

- (1) The inspectors reviewed the licensee's preliminary exercise scenario, which was submitted to the NRC on March 5, 2020, for the exercise which was scheduled to occur in early May 2020. The inspectors discussed the preliminary scenario with Mr. L. Mocnik, Manager, Emergency Preparedness, and other members of the emergency preparedness staff on April 6, 2020. The inspectors' review does not constitute NRC approval of the scenario.

Due to events surrounding the COVID-19 public health emergency, the licensee and offsite response organizations postponed the scheduled biennial exercise to a date yet to be determined. However, the scenario has been retained and securely controlled, such that it may be utilized when the exercise is conducted at the later date.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

IE04: Unplanned Scrams with Complications (USwC) Sample (IP Section 02.03) (1 Sample)

- (1) October 1, 2019 – March 31, 2020

MS05: Safety System Functional Failures (SSFFs) Sample (IP Section 02.04) (1 Sample)

- (1) April 1, 2019 – March 31, 2020

MS06: Emergency AC Power Systems (IP Section 02.05) (1 Sample)

- (1) October 1, 2019 – March 31, 2020

MS07: High Pressure Injection Systems (IP Section 02.06) (1 Sample)

- (1) October 1, 2019 – March 31, 2020

MS08: Heat Removal Systems (IP Section 02.07) (1 Sample)

- (1) October 1, 2019 – March 31, 2020

MS09: Residual Heat Removal Systems (IP Section 02.08) (1 Sample)

- (1) October 1, 2019 – March 31, 2020

MS10: Cooling Water Support Systems (IP Section 02.09) (1 Sample)

- (1) October 1, 2019 – March 31, 2020

BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (1 Sample)

(1) April 1, 2019 – March 31, 2020

BI02: RCS Leak Rate Sample (IP Section 02.11) (1 Sample)

(1) April 1, 2019 – March 31, 2020

71152 - Problem Identification and Resolution

Semiannual Trend Review (IP Section 02.02) (1 Sample)

- (1) The inspectors reviewed the licensee's corrective action program for potential adverse trends in emergency preparedness and training performance that might be indicative of a more significant safety issue.

Annual Follow-up of Selected Issues (IP Section 02.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

- (1) Inadvertent half scram during alternate rod insertion surveillance on May 13, 2020

71153 – Follow-up of Events and Notices of Enforcement Discretion

Reporting (IP Section 03.05) (1 Sample)

- (1) The inspectors reviewed the circumstances surrounding the retraction of Event Notification Report EN 54425 (<https://www.nrc.gov/reading-rm/doc-collections/event-status/event/2019/20191231en.html>).

INSPECTION RESULTS

Minor Violation	71114.04
<p>Minor Violation: The inspectors reviewed a licensee-identified violation of 10 CFR 50.54(q)(5) where the licensee failed to transmit to the NRC a summary of changes to the Emergency Plan within 30 days of implementation of the revision. Specifically, in a letter to the NRC on March 3, 2020 (ADAMS Accession No. ML20070K637), the licensee indicated that during a site assessment in December 2019, they identified that four revisions to Cooper Nuclear Station Emergency Plan Implementing Procedure (EPIP) 5.7.1, "Emergency Classification," (which as defined in 10 CFR 50.54(q)(1)(ii) is a part of the Emergency Plan) had not been transmitted to the NRC within 30 days of implementation. These revisions included Revision 60 (effective April 12, 2018), Revision 62 (effective February 6, 2018), Revision 63 (effective April 24, 2019), and the current Revision 64 (effective May 17, 2019). The licensee entered this issue into its corrective action program for resolution (Condition Report CR-CNS-2020-00546).</p> <p>Screening: The inspectors determined the performance deficiency was minor. The inspectors' review of the violation determined that it was most appropriately characterized as having a minor safety significance based on the review of the examples in the NRC Enforcement Policy, Section 6.9.d, and Inspection Manual Chapter 0611, Appendix E. The</p>	

licensee entered this minor violation into its corrective action program as Condition Report CR-CNS-2020-02438. This minor violation is being documented to acknowledge and close the violation the licensee identified on the docket in its March 3, 2020, letter to the NRC.

Enforcement: This failure to comply with 10 CFR 50.54(q)(5) constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

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

- On June 4, 2020, the inspectors presented the emergency plan revisions and exercise scenario review inspection results to Mr. L. Mocnik, Manager, Emergency Preparedness, and other members of the licensee staff.
- On July 9, 2020, the inspectors presented the integrated inspection results to Mr. J. Dent, Jr., Vice President and Chief Nuclear Officer, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.01	Corrective Action Documents	CR-CNS-	2020-02584	
	Procedures	5.1WEATHER	Operation During Weather Watches and Warnings	21
		7.0.11	Flood Control Barriers	31
71111.04	Corrective Action Documents	CR-CNS-	2018-04481, 2018-04635, 2018-06959, 2020-01804, 2020-02347, 2020-02348	
	Drawings	2016, Sheet 1A	Fire Protection Service Bldg's & Yard	9
		2016, Sheet 7	Fire Protection System Site Plan	12
		2031	Flow Diagram Reactor Building – Closed Cooling Water System	N65
		3058	DC One Line Diagram	68
	Fire Plans	CNS-FP-352	Yard Fire Protection	2
	Procedures	15.EE.601	24V and 125V PMIS Battery Weekly Check	15
		15.EE.602	24V and 125V PMIS Battery Quarterly Check	12
		2.2.26	24 VDC Electrical System	27
		2.2.67B	Reactor Core Isolation Cooling System Instrument Valve Checklist	3
		2.2A.REC.DIV1	Reactor Equipment Cooling Water System Component Checklist	1
		2.2A.RHR SW.DIV2	RHR Service Water Booster Pump System Component Checklist (DIV 2)	11
		2.2A_24DC.DIV1	24 VDC Power Checklist	3
		2.2A_24DC.DIV2	24 VDC Power Checklist	1
71111.05	Fire Plans	CNS-FP-211	Reactor Building Northeast Quadrant Elevations 881'-9" and 859'-9"	5
		CNS-FP-224	Control Building Basement Floor Elevation 882'-6"	5
		CNS-FP-226	Control Building RPS Room 1B Elevation 903'-6"	8
		CNS-FP-227	Control Building Corridor, Batt/SWGR Rms. 1A, RPS Rm. 1A Elevation 903'-6"	8
		CNS-FP-228	Control Building Battery/SWGR RMS 1B	8
		CNS-FP-256	Intake Structure Elevation 903'-6"	7

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Procedures	0-BARRIER-MAPS	Barrier Maps	10
71111.06	Miscellaneous	NEDC 09-102	Internal Flooding – HELB, MELB, and Feedwater Line Break	3
		Regulatory Issue Summary 2001-09	Control of Hazard Barriers	04/02/2001
	Procedures	0-BARRIER	Barrier Control Process	30
71111.11Q	Corrective Action Documents	CR-CNS-	2020-02298	
	Procedures	2.0.3	Conduct of Operations	104
71111.12	Corrective Action Documents	CR-CNS-	2017-00532, 2017-05821, 2018-01346, 2018-01490, 2020-00717, 2020-00771, 2020-00872, 2020-00888, 2020-01396, 2020-01694, 2020-02009, 2020-02014, 2020-02299	
	Miscellaneous		CNS Maintenance Rule Periodic Assessment, September 2017 to August 2019	
			Radiation Monitoring System Health Report	03/2020
		DG-PF01	Maintenance Rule Function DG-PF01 Performance Criteria Basis Document	6
		EE-PF10	Maintenance Rule Function EE-PF10 Performance Criteria Basis Document	7
		HPCI-PF01	Maintenance Rule Function HPCI-PF01 Performance Criteria Basis	6
		RMA-F02	Maintenance Rule Function RMA-F02 Performance Criteria Basis Document	4
	Procedures	3-EN-DC-204	Maintenance Rule Scope and Basis	4C0
		3-EN-DC-205	Maintenance Rule Monitoring	7C0
		EN-DC-159	System Monitoring Program	6C1
71111.13	Miscellaneous		Protected Equipment List for RHR System Maintenance Week 2018	
	Procedures	0-PROTECT-EQP	Protected Equipment Program	54
	Work Orders	WO	5191421, 5209464, 5211245, 5211250, 5287225	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.15	Corrective Action Documents	CR-CNS-	2020-00766, 2020-00769, 2020-01649, 2020-01765, 2020-01863, 2020-01872, 2020-01883, 2020-01905, 2020-01910, 2020-01929, 2020-01933, 2020-02193, 2020-02356, 2020-02584, 2020-02647	
	Drawings	CNS-EQ-129, Sheet 1	Limitorque – Valve Actuator EQ Configuration Detail	2
		CNS-EQ-129, Sheet 3	Limitorque – Valve Actuator EQ Configuration Detail	5
	Miscellaneous		Master Equipment List	47
			Environmental Qualification Program Basis Document	11
		EQDP.2.129DOR	Environmental Qualification Date Package	10
		NEDC 09-102	Internal Flooding – HELB, MELB, and Feedwater Line Break	3
		Vendor Manual VM-0986	Limitorque Composite Manual	34
	Procedures	0-CNS-WM-100	Work Order Generation, Screening, and Classification	15
		2.1.12	Control Room Data	139
		3.12.1	Environmental Qualification Program Implementation	13
		3.12.2	Environmental Qualification Data Package	23
		3.12.7	Control of Master Equipment List	9
		5.10FLEX	FLEX Support Guidelines	6
		5.10FLEX.21	Shutdown Injection FLEX Operations	2
		5.3GRID	Degraded Grid Voltage	54
	Work Orders	WO	5340245	
71111.18	Work Orders	WO	5333835	
71111.19	Corrective Action Documents	CR-CNS-	2019-03873, 2020-01673, 2020-01676, 2020-01679, 2020-01680	
	Procedures	2.2.73	Standby Gas Treatment System	60
		6.1SGT.301	SGT Operability Test/Off Gas Flow Monitor Channel Functional Test IST	16
		6.HPCI.102	HPCI Test Mode Surveillance Operation from ASD-HPCI Panel	31
		6.HPCI.103	HPCI IST and 92 Day Test Mode	58
		7.0.14.1	Vibration Monitoring Program	12

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		7.3.14	Thermal Examination of Plant Components	10
		7.3.41	Examination, Repair, and High Pot Testing of Non-Segregated Buses and Associated Equipment	17
	Work Orders	WO	5207766, 5209747, 5211624, 5211625, 5231686, 5243745, 5270031, 5315539, 5335313, 5336157, 5345116	
71111.22	Procedures	10.9	Control Rod Scram Time Evaluation	71
		5.10FLEX.31	FLEX Equipment Refueling Operations	4
		5.3ALT-STRATEGY	Alternate Core Cooling Mitigating Strategies	61
		6.2DG.101	Diesel Generator 31 day Operability Test (IST) (DIV 2)	87
	Work Orders	WO	5313763	
71114.04	Corrective Action Documents	CR-CNS-	2020-00546	
	Corrective Action Documents Resulting from Inspection	CR-CNS-	2020-02438	
	Miscellaneous	50.54(q) Evaluation No. 2018-64	Evaluation for EPIP 5.7.1, Rev 61	09/20/2018
		50.54(q) Evaluation No. 2019-09	Evaluation for CNS Emergency Plan Rev 73 (related to EPIP 5.7.1, Rev 63)	06/24/2019
		50.54(q) Evaluation No. 2020-12	Evaluation for CNS Emergency Plan, Rev 75	03/13/2020
		50.54(q) Screen No. 2018-26	Screen for EPIP 5.7.1, Rev 60	03/21/2018
		50.54(q) Screen No. 2018-64	Screen for EPIP 5.7.1, Rev 61	09/18/2018
		50.54(q) Screen No. 2019-02	Screen for EPIP 5.7.1, Rev 62	01/16/2019
		50.54(q) Screen No. 2019-033	Screen for EPIP 5.7.1, Rev 64	05/09/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		50.54(q) Screen No. 2019-10	Screen for EPIP 5.7.1, Rev 63	02/21/2019
		50.54(q) Screen No. 2019-87	Screen for CNS Emergency Plan, Rev 75	11/15/2019
		50.54(q) Screen No. 2020-12	Screen for CNS Emergency Plan, Rev 75	03/11/2020
	Procedures	Administrative Procedure 0.29.4	Other Regulatory Reviews	30, 31
71151	Miscellaneous		Operator Logs October 1, 2019, to March 31, 2020	
	Procedures	0-EN-LI-114	Regulatory Performance Indicator Process	17C0
71152	Corrective Action Documents	CR-CNS-	2020-01490, 2020-01494, 2020-01502, 2020-01524	
	Procedures	0-EN-HU-102	Human Performance Traps and Tools	13C5
		6.1ARI.701	ARI/ATWS/RPT Low-Low and PCIS Low-Low-Low Reactor Water Level Channel Functional Test	13, 14
71153	Corrective Action Documents	CR-CNS-	2019-06278, 2019-06380	
	Engineering Changes	EC 15-013	Classification of Design and Licensing Bases for Auxiliary Steam Line Breaks Outside of Secondary Containment	0
	Engineering Evaluations	EE 08-008	Determination of SEB Door Applicability	1
	Miscellaneous	NEDC 19-009	Operability Calculation for Auxiliary Steam Line Break in Critical Switchgear Room	0