



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

June 28, 2021

Mr. David Rhoades
Senior VP, Exelon Generation Company, LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION – BIENNIAL PROBLEM IDENTIFICATION AND
RESOLUTION INSPECTION REPORT 05000461/2021012

Dear Mr. Rhoades:

On May 21, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your Clinton Power Station and discussed the results of this inspection with Mr. T. Chalmers, Site Vice President, 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/

Kenneth R. Riemer, Chief
Branch 1
Division of Reactor Projects

Docket No. 05000461
License No. NPF-62

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to David Rhoades from Kenneth Riemer dated June 28, 2021.

SUBJECT: CLINTON POWER STATION – BIENNIAL PROBLEM IDENTIFICATION AND
RESOLUTION INSPECTION REPORT 05000461/2021012

DISTRIBUTION:

Jessie Quichocho
Aaron McCraw
RidsNrrDorlLpl3
RidsNrrPMClinton Resource
RidsNrrDrolrib Resource
John Giessner
Mohammed Shuaibi
Jamnes Cameron
Allan Barker
DRSIII
DRPIII
ROPreports.Resource@nrc.gov

ADAMS ACCESSION NUMBER: ML21179C287

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RIII	RIII	RIII		
NAME	JGilliam:ve via email	JCameron via email	KRiemer via email		
DATE	06/28/2021	06/24/2021	6/28/2021		

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 05000461

License Number: NPF-62

Report Number: 05000461/2021012

Enterprise Identifier: I-2021-012-0015

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, IL

Inspection Dates: May 03, 2021 to May 21, 2021

Inspectors: J. Kutlesa, Physical Security Inspector
V. Meghani, Reactor Inspector
R. Ng, Project Engineer
D. Sargis, Resident Inspector

Approved By: Kenneth R. Riemer, Chief
Branch 1
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 Clinton Power 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.

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 Disease (COVID-19), regional inspectors were directed to begin telework. During this time regional baseline inspections were evaluated to determine if all or portions of the objectives and requirements stated in the IP could be performed remotely. In some cases, portions of an IP were completed remotely and on-site. The inspection documented below was determined that the objectives and requirements stated in the IP could be completed remotely.

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 5-year review on shutdown service water piping leakage and FLEX related issues. Note that the inspectors did not review the corrective actions related to a White NOV in the Security cornerstone since the Inspection Procedure 95001 Supplemental Inspection has not been completed.
 - 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
<p>Based on the samples reviewed, the team concluded that the licensee's implementation of the Corrective Action Program was generally effective and supported nuclear safety.</p> <p><u>Effectiveness of Problem Identification:</u></p> <p>Based on the samples reviewed, the team concluded that the licensee continued to identify issues at a low threshold and appropriately entered these issues into the Corrective Action Program. The team determined that the licensee usually entered problems into the Corrective Action Program completely and accurately. However, the team identified a condition adverse to quality that should have been entered into the Corrective Action Program for resolution. Additional details of this issue are discussed in the Minor Violation section of this report.</p> <p>The team also 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 Corrective Action Program. In addition, the licensee also utilized a number of Corrective Action Program support processes to identify problems, including the self-assessment and audit process and the Operating Experience Program. For example, the licensee performed 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 Corrective Action Program when they were applicable to the station.</p> <p>The team determined that the licensee was generally effective at trending low-level issues and taking appropriate corrective actions to prevent more significant problems from developing. In addition, the licensee used the Corrective Action Program to document instances in which previous corrective actions were ineffective or were inappropriately closed.</p> <p>The team performed a 5-year review of the shutdown service water piping leakage issues. As part of this review, the team interviewed the system engineer, reviewed the plant health report, and reviewed selected corrective actions and condition evaluation documents. In addition, the team performed a partial system walkdown to assess the material condition of the system piping and surrounding areas. The team concluded that the shutdown service water system piping degradation and leakage concerns were identified and entered into the Corrective Action Program at a low threshold and were resolved in a timely manner commensurate with their safety significance. For the areas walked down, the team did not identify any additional issues.</p> <p><u>Effectiveness of Prioritization and Evaluation of Issues:</u></p> <p>Based on the samples reviewed, the team determined that licensee performance was generally effective at prioritizing and evaluating issues commensurate with the safety significance of the identified problem. The Ownership Screening Committee and the Management Review Committee meetings were generally thorough and intrusive in reviewing issues and prioritizing actions. In addition, the team observed a productive dialogue between the members of these committees and the members challenged each other when dispositioning issues.</p>	

Enclosure

In general, once a degraded or non-conforming condition was identified, the Corrective Action Program directed that an equipment operability or functionality review be performed. As a result, the majority of the samples reviewed were evaluated in a timely manner.

Effectiveness of Corrective Actions:

Based on the samples reviewed, the team determined that the licensee was generally effective in corrective action implementation. In general, corrective actions for deficiencies that were safety significant were implemented in a timely manner. Problems identified using a root cause or other cause methodologies were resolved in accordance with Corrective Action Program requirements. The corrective actions assignments that were sampled by the team for selected NRC documented violations and for licensee event reports (LERs) were generally effective and timely.

The team performed a 5-year review of the station's diverse and flexible coping strategies (FLEX). As part of this review, the team reviewed corrective action documents, the plant health report, the licensee's responses to various industry operating experiences and previously identified NRC findings related to FLEX. In addition, the team performed a partial system walkdown to assess the material condition and proper storage and staging of FLEX equipment. The team concluded that FLEX system deficiencies were identified and entered into the Corrective Action Program at a low threshold and were generally resolved in a timely manner commensurate with their safety significance. The inspectors did not identify any violations of NRC requirements.

Assessment	71152B
Based on the samples reviewed, the team determined that licensee's performance in the use of operating experience was generally effective. The licensee's corporate office screened industry and NRC operating experience information for applicability to Clinton Power Station. Based on these initial screenings, the licensee-initiated actions in the Corrective Action Program to fully evaluate the impact, if any, to the station. When applicable, actions were developed and implemented to prevent similar issues from occurring. Operating experience lessons learned were communicated and incorporated into plant operations. The team observed the information being used in daily activities, such as pre-job briefs, as well as issue reviews and investigations.	

Assessment	71152B
Based on the samples reviewed, the team determined that the licensee's performance of self-assessments and audits was generally effective. The licensee performed department self-assessments and quality assurance audits throughout the organization on a periodic basis. These self-assessments and audits were generally effective at identifying issues and enhancement opportunities at an appropriate threshold. The self-assessments and audits reviewed by the team identified issues that were not previously known, including issues within the Corrective Action Program itself. Nuclear Oversight (NOS) identified deficiencies with the licensee's processes and those issues were addressed by the station through the Corrective Action Program.	

Assessment	71152B
Based on a review of documents and interviews with licensee staff, the team did not identify any impediment to the establishment of a safety conscious work environment. The team reviewed the results from the 2020 Safety Culture Assessment, the culture survey from first	

quarter of 2021 performed by the licensee, and the Nuclear Safety Culture Monitoring Panel meeting minutes. The team also conducted one-on-one interviews with 20 licensee staff concerning the effectiveness of the Corrective Action Program, the ability to raise issues, and the freedom from potential retaliation for raising issues.

In general, the licensee's staff was aware of and familiar with the Corrective Action Program and other processes, such as the Employee Concerns Program, to raise nuclear safety concerns. Licensee staff indicated they could raise safety concerns without a fear of retaliation. Through the interviews and document reviews, the team was not provided or identified any examples of retaliation for raising nuclear safety concerns. The staff interviewed believed that operational issues and issues with high safety significance were being appropriately addressed in a timely manner.

Minor Violation	71152B
<p>Minor Violation: In 2019, the licensee added a section in Procedure 3309.01, High Pressure Core Spray (HPCS), to maintain HPCS availability using the recycle condensate system should the waterleg pump not be available to keep the system full of water. This portion of the procedure would direct the operators to open the isolation valves between the two systems and use the recycle condensate system to fill and vent the HPCS system. In June of 2019, an operator identified the potential of over-pressurizing the recycle condensate system if HPCS auto starts during this activity because the low pressure recycle condensate system would be opened to the high-pressure HPCS system. The issue was screened as a non-corrective action program (NCAP) item and not resolved or evaluated until the inspectors reviewed this issue during this inspection.</p> <p>When questioned by the inspectors about the consequences of the over-pressurization, the licensee stated that it could cause piping failure or leakage in the recycle condensate system. In addition, it would also divert the needed HPCS injection to the recycle condensate system. The licensee did not have a formal engineering evaluation of the potential consequences. The licensee agreed that this issue is a condition adverse to quality and should have screened as a corrective action program item. The licensee has issued a Daily Order to suspend the use of this section of the procedure.</p> <p>Since the revision of the procedure in 2019, the licensee has not executed this section of the procedure. Given the isolation valves between the two systems was a safety related class 2 piping and an operator would be present and in communication with the main control room during this activity, the inspectors determined that the operator could close the isolation valves promptly even if HPCS auto starts and damage occurs in the recycle condensate system.</p> <p>The inspectors determined that the failure to identify a condition adverse to quality and promptly correct the condition is a performance deficiency and a violation of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions."</p> <p>Screening: The inspectors determined the performance deficiency was minor. The inspectors determined that this issue is minor because this issue is similar to IMC 0612, Appendix E, Example 4.g. This performance deficiencies did not adversely affect the mitigating systems cornerstone objective because this is a failure to identify the issue and implement a corrective action that had little safety impact. This activity has never been performed since the procedure revision and the isolation valves were accessible and could be</p>	

closed to recover the HPCS system by the operator standing by in the area during the activity.

Enforcement: This failure to comply with 10 CFR 50, Appendix B, Criterion V, "Corrective Actions," constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy. The licensee issued a Daily Order to prevent the utilization of that section of the procedure and entered the issue in their CAP as AR 4424769.

EXIT MEETINGS AND DEBRIEFS

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

- On May 21, 2021, the inspectors presented the biennial problem identification and resolution inspection results to Mr. T. Chalmers, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152B	Corrective Action Documents	AR 1296821	3514.01C012 480V Unit Sub 1D Bus Outage Checklist Impacts	12/01/2011
		AR 1329147	1PL12JA-A1: Re-Evaluate EDG Voltage Regulator R3 Replacement	02/20/2012
		AR 1390648	Protective Relay Tolerances Require Fleet Review	07/19/2012
		AR 1403682	Received Unexpected Annunciator 5050-5H, Trouble SGTS Elect	08/22/2012
		AR 1460640	NRC Question MRFR for 1VX06CA / 1SX024A, AR 1383458-03	01/09/2013
		AR 1474231	Maintenance ATV-Systematic Approach to Training - 2019	01/01/2020
		AR 1483230	Enhancement for Protective Relay Calculations	03/04/2013
		AR 1594407	Automatic Trip of Breaker 1PA07EJ	12/09/2013
		AR 1627756	1DC05E Has More Than Half of Cells Weeping	02/28/2014
		AR 2381871	Failure of the Outer/Upper Motor Bearing for 1SX01PC	09/16/2014
		AR 2556763	Enhancement Maintaining Valid Control Rod Position	09/17/2015
		AR 2560629	SX DIV 1 Supply Header Low Point Drain Leak	09/25/2015
		AR 2598038	UT Results On 1sx01ab-30" Are Near Code Allowable Min-Wall	12/09/2015
		AR 2600682	UT Results On 1SX203AB-2"	12/15/2015
		AR 2610350	RWCU Isolation Due to Failed Temperature Instrument	01/10/2016
		AR 2621780	1FC004B Failed Stroke Time	01/04/2016
		AR 2655457	(2016 CDBI FASA) Calc 19-AJ-18 Weakness	04/14/2016
		AR 2695275	NRC Question on Operability of Div 1 SX During Maintenance	07/21/2016
		AR 2733400	WO Required for Inspection of Weld Overlay on SX Piping	10/27/2016
		AR 2733400	WO Required for Inspection of Weld Overlay on SX Piping	10/27/2016
		AR 2742442	CDBI: Inappropriate Calculation Method for CR Habitability	11/17/2016
		AR 3944082	NRC NCV 2016003-04 Fail to Prevent Recurrence of a SCAQ	11/22/2016
		AR 3969239	NRC NCV 2016009-02 SFP Temp and Level Not in MRULE	02/01/2017
		AR 3987864	Procedure Revisions for EC 618355, 1CO04J	03/21/2017

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		AR 4001089	NRC Cited Violation for Design Control	04/21/2017
		AR 4051565	Error in Calc 3C10-0485-001 Associated with Flood Level	09/13/2017
		AR 4051565	Error in Calc 3C10-0485-001 Associated with Flood Level	09/13/2017
		AR 4105738	1SX019A Has Valve Erosion at The Lower Disc Pin Area	02/19/2018
		AR 4110203	Root Cause for NRC Div 3 SX Pump White Finding	03/01/2018
		AR 4125840	11AA: 2018 UT Results Lower Than Expected	04/12/2018
		AR 4125840	1SX111AA: 2018 UT Results Lower Than Expected	04/12/2018
		AR 4158854	1SXB5BA: 2018 UT Results Lower Than Expected	07/25/2018
		AR 4166869	ECAPE 4116223 Extent of Condition Work Orders Cancelled	08/24/2018
		AR 4177094	NRC INFO NOTICE 2018 Kobe Steel QA Falsification	09/26/2018
		AR 4185385	Mechanical Snubbers Removed Without EQ Review	10/19/2018
		AR 4220546	EP OE: Offsite Notification Due to Inadvertent Siren Activate	02/15/2019
		AR 4220600	NOS: EP ID: Evacuation Route Signs are Illegible	02/15/2019
		AR 4222006	EP ID: 2019 NRC Pre-Exercise - OSC Performance	02/20/2019
		AR 4230952	NRC IN 2019-01: Inadequate Evaluation of Temp Alterations	03/19/2019
		AR 4248447	EP ID: RSCL Phone Line INOP	05/13/2019
		AR 4250932	1AP07EK Main Feed Breaker Failed to Close During Bus Shift	05/22/2019
		AR 4250998	NRC ID: Paragon Risk Incorrect	05/22/2019
		AR 4251273	EP ID: ERO Focus Area Drill Rescheduled	05/23/2019
		AR 4251489	Entered 4002.01, Abnormal RPV Level/Loss of FW at Power	05/24/2019
		AR 4255647	PCRA 3209.01 HPCS CY Float Start	06/10/2019
		AR 4258645	2SXA9AA: UT Results Lower Than Acceptance Criteria	06/21/2019
		AR 4258645	2SXA9AA: UT Results Lower Than Acceptance Criteria	06/21/2019
		AR 4260500	SEC ID: Complete Loss of Power to CAS and SAS	06/28/2019
		AR 4262593	EP ID: Trend IR: Multiple CPS Siren Failures	07/08/2019
		AR 4263520	Flex Diesel Generator Phase Rotation	07/11/2019
		AR 4269131	NRC NCV 2019040-01: Fail to Complete EFR for CAPR	08/02/2019
		AR 4269353	Root Cause Investigation Report; TDRFP B Turbine LVDT Failure Results in an Automatic RPS SCRAM on RPV Level 3	09/11/2019
		AR 4272994	NRC FIN 2019002-01 Fail Prop Eval Plant Risk	08/19/2019
		AR 4277173	NRC IN 2019-05: Overpressurization of Alpha Sources	09/06/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		AR 4278245	Arc Flash Event	09/11/2019
		AR 4280147	TDRFP B Scram Lessons Learned: LVDT/Torque Arm Strategies	09/18/2019
		AR 4284526	Eoid SRV 51B Actuates Instead of 41B	10/02/2019
		AR 4286641	1E22F015 HPCS Suction Valve Did Not Open During Valve Stroke	10/10/2019
		AR 4288235	NRC IN 2019-08 OPEX Regarding FAC Causing RX Scrams	10/19/2018
		AR 4297570	Root Cause Report: FLEX Diesel Generator 1FX01KA Incorrect Phase Rotation	11/15/2019
		AR 4301533	CAPE: Fire Protection System and Program Health	12/04/2019
		AR 4307907	SLC Pressure Regulator 1C41-F351 Reads Above Full Scale	01/03/2020
		AR 4311763	Contraband Introduced into the Protected Area (PA)	03/12/2020
		AR 4312418	EP-IEMA EMNET Phones Inoperable	01/24/2020
		AR 4329201	CAPE: Entered Loss of Feedwater Heating 4A Heater Restoration	03/24/2020
		AR 4340981	CAPE: Personnel Entered Precautionary Posted HRA Without HRA Brief	05/04/2020
		AR 4346309	NRC FIN 2020001-01 FLEX Diesel Generator Phase Rotation	05/28/2020
		AR 4352937	CAPE: FLEX Diesel Generator Breaker Settings	06/26/2020
		AR 4364203	1SX29BB-3", Div II SX Strainer Backwash Pipe Replacement	08/19/2020
		AR 4365604	EP: Clinton 2020 Off-Year Exercise - TSC Issues	08/26/2020
		AR 4369686	NRC IN 2020-02 - Flex Diesel Operational Challenges	09/16/2020
		AR 4370305	NRC IN 2020-01 - Electr. Equip. Issues After COVID Cleaning	09/18/2020
		AR 4374683	Need Procedure Revision on 9433.23 ECCS HPCS Pump E22-N051	10/06/2020
		AR 4383175	NRC IN 2020-03 Recall of Edwards 135 Degree Heat Detectors	11/09/2020
		AR 4384779	CAPE: 0VC21YB 0VC24YB & 0VC27YB Lost Power	11/16/2020
		AR 4390355	Sec AA/FFD Clinton Security Training Inst CG Requirements Expired	12/15/2020
		AR 4391803	NRC IN 2020-04 - FP Mn Yard Buried Cast Iron Piping Failures	12/23/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		AR 4401345	NRC ID: Observation on 30-Day Observations of Remote Workers	02/09/2021
		AR 4404476	NRC Green FIN 2020004-01 FLEX DG Settings for Output Breakers	02/24/2021
		AR 4408095	0WM118B Through Wall Leak	03/11/2021
		AR 455060	Closure of B.5.B Phase 1 NRC Issues	02/17/2016
		AR 916815	RCIC Tripped During Startup	05/07/2009
	Corrective Action Documents Resulting from Inspection	AR 4421725	PCRA PI-AA-125-1003	05/05/2021
		AR 4421740	PCRA for PI-AA-125-1001	05/05/2021
		AR 4422020	PI&R 2021: RCR 4269353 Missing CA for Contributing Cause	05/06/2021
		AR 4422255	WO for Digital Feedwater Testing Not Supervisory Reviewed	06/06/2021
		AR 4422839	Response to CA 4284526-29 Not Robust	05/11/2021
		AR 4423155	Lesson Learned IR 4280147 Action Canceled in Error	05/12/2021
		AR 4424142	NRC ID: Operations S.O. for DHP Brkr List is Not Current	05/17/2021
		AR 4424391	Response to Action Under IR 4402535, Not Robust	05/18/2021
		AR 4424747	NRC ID: Action Cancellation Documentation	05/20/2021
		AR 4424769	NRC ID: IR Processed as NCAP in Error	05/20/2021
		AR 4424800	Actions for IR 2733400 Not Created	05/20/2021
	Drawings	M05-1012 Sh. 2	P&ID Cycled Condensate (CY) (Turbine Building)	N
		M05-1012 Sh. 6	P&ID Cycled Condensate (CY) (Aux. Fuel & Cont. Building)	X
		M05-1074 Sh. 1	P&ID High Pressure Core Spray (HP)	AH
	Engineering Evaluations	CPS-1-2020-0262	DHP Breaker Risk Assessment	0
	Miscellaneous		Operations Department Daily Order	05/17/2021
			Nuclear Safety Culture Monitoring Panel Report	03/01/2021
			Nuclear Safety Culture Survey #4	03/31/2021
		2019-10	Unit 1 Standing Order - DHP Breaker Extent of Condition	2
		FC-00-L	Maintenance Rule System Basis Document - Fuel Pool Cooling Functions	05/19/2021
		FX-03	Maintenance Rule System Basis Document - Flex Spent Fuel Pool Instruments	05/19/2021
		PIAP 2019-0330	Performance Improvement Action Plan - Operations	06/15/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Procedures	3309.01	High Pressure Core Spray (HPCS)	18b
		8223.05	RCIC Steam Supply Turbine Governing Valve and Linkage Maintenance (1E51F610)	0e
		AD-40.01	Roles and Responsibilities	2
		AR 4202541	DBAI SA, EC 622677 Still at "Assigned" Status	12/12/2018
		EI-AA-101	Employee Concerns Program	11
		EI-AA-101-1001	Employee Concerns Program Process	15
		PI-AA-1012	Safety Culture Monitoring	3
		PI-AA-120	Issue Identification and Screening Process	11
		PI-AA-125	Corrective Action Program (CAP) Procedure	7
		PI-AA-125-1001	Root Cause Analysis Manual	6
		PI-AA-125-1003	Corrective Action Program Evaluation Manual	6
		PI-AA-126-1001	Self-Assessments	4
	Self-Assessments	AR 1474231	Maintenance ATV-Systematic Approach to Training - 2019	01/01/2020
		AR 4139365	2018 Mid Cycle Org Effectiveness Survey Assessment	10/31/2018
		AR 4199090	2019 ALARA (Site Review)	12/31/2019
		AR 4250915	NOSA-CPS-19-05 Clinton Engineering Design Audit	05/22/2019
		AR 4252830-02	SA Report - Exelon 10 CFR 50.59 Review Process	09/30/2019
		AR 4296535	2020 Clinton Clearance and Tagging Self-Assessment	11/22/2020
		AR 4324143	NOSA-CPS-20-03 Clinton Station Emergency Preparedness Audit	03/05/2020
		AR 4338593-04	SA(EP) NRC Emergency Preparedness Program Inspection	08/21/2020
		AR 4376069	Preparation for NRC Problem Identification and Resolution (PI&R) Inspection	03/11/2021
		AR 4409641	2020 Clinton Safety Culture Assessment	03/19/2021
		NOSA-COMP-19-08	2019 Operations Comparative Audit Report	11/07/2019
		NOSA-CPS-19-04	Corrective Action Program Audit Report	03/01/2019
		NOSA-CPS-19-06	Radiation Protection Audit Report	07/24/2019
		NOSA-CPS-20-01	Maintenance Functional Area Audit Report	03/11/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		NOSA-CPS-20-02	Security Programs Audit Report	02/26/2020
		NOSA-CPS-20-08	Fitness-for-Duty and Access Authorization Program Audit Report	08/28/2020