



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

November 13, 2023

EA-23-087

David Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - INTEGRATED INSPECTION REPORT 05000237/2023003 AND 05000249/2023003 AND EXERCISE OF ENFORCEMENT DISCRETION

Dear David Rhoades:

On September 30, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Dresden Nuclear Power Station, Units 2 and 3. On October 18, 2023, the NRC inspectors discussed the results of this inspection with P. Boyle, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

Two findings of very low safety significance (Green) are documented in this report. Two of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

A licensee-identified violation which was determined to be of very low safety significance is documented in this report. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region III; the Director, Office of Enforcement; and the NRC Resident Inspector at Dresden Nuclear Power Station, Units 2 and 3.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region III; and the NRC Resident Inspector at Dresden Nuclear Power Station, Units 2 and 3.

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,



Signed by Ruiz, Robert
on 11/13/23

Robert Ruiz, Chief
Reactor Projects Branch 1
Division of Operating Reactor Safety

Docket Nos. 05000237 and 05000249
License Nos. DPR-19 and DPR-25

Enclosure:
As stated

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Letter to David Rhoades from Robert Ruiz dated November 13, 2023.

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - INTEGRATED INSPECTION REPORT 05000237/2023003 AND 05000249/2023003 AND EXERCISE OF ENFORCEMENT DISCRETION

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000237 and 05000249

License Numbers: DPR-19 and DPR-25

Report Numbers: 05000237/2023003 and 05000249/2023003

Enterprise Identifier: I-2023-003-0051

Licensee: Constellation Energy Generation, LLC

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: Morris, IL

Inspection Dates: July 01, 2023 to September 30, 2023

Inspectors: J. Cassidy, Senior Health Physicist
A. Muneeruddin, Resident Inspector
M. Porfirio, Illinois Emergency Management Agency
C. St. Peters, Resident Inspector
J. Steffes, Senior Resident Inspector

Approved By: Robert Ruiz, Chief
Reactor Projects Branch 1
Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee’s performance by conducting an integrated inspection at Dresden Nuclear Power Station, Units 2 and 3, 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. A licensee-identified non-cited violation is documented in report section: 71111.15.

List of Findings and Violations

Failure to Perform Performance Response Check for Instrumentation			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Occupational Radiation Safety	Green NCV 05000237,05000249/2023003-01 Open/Closed	[H.11] - Challenge the Unknown	71124.08
The inspectors identified a finding of very low safety significance (Green), and an associated non-cited violation of Technical Specification 5.4.1, “Procedures,” for the licensee’s failure to implement procedures for control of radioactivity. Specifically, the licensee did not conduct a performance source check on a frisker used to perform critical surveys of personnel for release from the radiologically controlled area to unrestricted areas, as required by procedure RP-AA-700, “Controls for Radiation Protection Instrumentation.”			

Failure to Install Safety-Related Circuit Breakers in the Unit 2 Alternate Battery, a Safety-Related System			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000237,05000249/2023003-02 Open/Closed	None (NPP)	71152A
A self-revealed finding of very low safety significance (Green) and associated non-cited violation (NCV) of 10 CFR 50 Appendix B, Criterion III, occurred on July 6, 2023, when it was identified that non-quality controlled, non-dedicated circuit breakers were installed in the Unit 2 125VDC alternate battery, a safety-related system.			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
ED	EA-23-087	Enforcement Action EA-23-087: Failure to Comply with 10 CFR Part 37	71124.08	Closed

PLANT STATUS

Unit 2 began the inspection period at full rated thermal power. On July 8, 2023, the unit was reduced to 82 percent power for control rod pattern adjustment and the unit was returned to full power the next day. On August 19, 2023, the unit was reduced to 82 percent power for control rod pattern adjustment and the unit was returned to full power the next day. On September 1, 2023, the unit was reduced to 84 percent power for control rod pattern adjustment, and the unit was returned to full power the same day. On September 2, 2023, the unit was reduced to 84 percent power for the final control rod pattern adjustment and scram solenoid pilot valve replacement; the unit was returned to full power the same day. On September 8, 2023, the unit entered coast down operations in preparation for refueling outage D2R28 and remained in that condition for the remainder of the inspection period.

Unit 3 began the inspection period at full rated thermal power. On September 1, 2023, the unit was reduced to 67 percent power for control rod pattern adjustment and turbine generator automatic voltage regulator maintenance. The unit was returned to full power operation on September 2, 2023, and remained at or near full 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 performed activities described in IMC 2515, Appendix D, "Plant Status," observed risk significant activities, and completed on-site portions of IPs. 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.

REACTOR SAFETY

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) Unit 2 high pressure coolant injection (HPCI) system on August 2-7, 2023
- (2) Unit 3 'A' reactor building closed cooling water on August 8-18, 2023
- (3) Unit 2 service water system on August 9-21, 2023
- (4) Unit 2 low pressure coolant injection system on August 31, 2023

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (7 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) Fire Zone (FZ) 8.2.1A, Unit 2 condensate pumps elev. 469', and FZ 8.2.1B, Unit 3 condensate pumps elev. 469' on July 7, 2023
- (2) FZ 11.3, Unit 2/3 circulating water pumps elev. 490', Unit 2/3 service water pumps / traveling screens elev. 509', and Unit 2/3 crib house ground floor elev. 517' on August 2, 2023
- (3) FZ 11.2.2, Unit 2 southeast corner room elev. 476' on August 3, 2023
- (4) FZ 1.1.2.1, Unit 2 torus basement elev. 476' and torus catwalk on August 3, 2023
- (5) FZ 7.0A.1-3/8.2.7, Unit 2 battery room elev. 549' on August 7, 2023
- (6) FZ 1.1.1.2 Unit 3 reactor building ground floor elev. 517', and FZ 1.1.1.3 Unit 3 reactor building general area elev. 545' on August 22, 2023
- (7) FZ 11.1.3, Unit 3 HPCI pump room elev. 476', and FZ 11.1.2 Unit 3 southeast corner room elev. 476' on August 30, 2023

Fire Brigade Drill Performance Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated the onsite fire brigade training and performance during an announced fire drill on August 10, 2023.

71111.06 - Flood Protection Measures

Flooding Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated internal flooding mitigation protections in the:
Unit 2 reactor building mezzanine elevation 545'
Unit 3 reactor building mezzanine elevation 545'

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 rod pattern adjustment in support of end of cycle operations on July 8-9, 2023

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

- (1) The inspectors observed and evaluated licensed crew performance in the simulator during scenarios LT SEG 23-01A and LT SEG DOA 4400-06, on August 9, 2023

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (1 Sample)

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

- (1) Radiation monitoring

Quality Control (IP Section 03.02) (1 Sample)

The inspectors evaluated the effectiveness of maintenance and quality control activities to ensure the following SSC remains capable of performing its intended function:

- (1) Unit 2 station blackout (SBO) diesel maintenance window from June 26–29, 2023

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (2 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) Emergent plant challenges associated with grassing event at the ultimate heat sink, on July 19, 2023
- (2) Station risk during elevated outside temperatures, week of August 21–25, 2023

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (9 Samples)

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

- (1) Unit 3 battery room A/C compressor and fan breaker tripped, as documented in CR 4688851
- (2) Unit 3 SBO diesel generator output breaker failed to close during testing as documented in CR 4548341
- (3) Unit 3 HPCI check valve 3-2301-7 will not open < 90 ft/lbs torque as documented in CR 4535439
- (4) FLEX hose trailer 3 not tied down as documented in CR 4694915
- (5) 2/3 reactor building and chimney particulate, iodine, and noble gas monitor system following sample results as documented in CR 4695055
- (6) Cardox fire suppression system functionality determination following leak identification as documented in CR 4695609
- (7) Unit 2 emergency diesel generator (EDG) failed to start from the control room as documented in CR 4696270

- (8) 2-4115-500, Fire Protection H2 Seal Unit Deluge System SV, valve closed without required fire watch established as documented in CR 4696111
- (9) Increase in Unit 2 drywell floor drain leakage as documented in CR 4701027

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02)
(2 Samples)

The inspectors evaluated the following temporary or permanent modifications:

- (1) TCC-2023-02-037, U2 digital electrohydraulic control (DEHC) axial thrust bearing wear detector probe #1 forced value entered
- (2) TCC-2023-03-003, Install an auxiliary oil tank in the drywell to provide ability to add oil to the 3B recirculation pump motor lower bearing

71111.24 - Testing and Maintenance of Equipment Important to Risk

The inspectors evaluated the following testing and maintenance activities to verify system operability and/or functionality:

Post-Maintenance Testing (PMT) (IP Section 03.01) (3 Samples)

- (1) Unit 3 station blackout (SBO) diesel run following breaker replacement, on July 15, 2023
- (2) Unit 3 'B' fuel pool cooling pump run following replacement of 3-1901-108B, 3B fuel pool cooling pump suction, on August 25, 2023
- (3) Unit 2 EDG modified run following replacement of control switch 2-6640-48 on August 28, 2023

Surveillance Testing (IP Section 03.01) (2 Samples)

- (1) Unit 3 HPCI system test, work order 5382243
- (2) Unit 2 HPCI system test, work order 5379811

Inservice Testing (IST) (IP Section 03.01) (1 Sample)

- (1) 2/3 diesel generator cooling water pump test, work order 5354595

RADIATION SAFETY

71124.08 - Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation

Radioactive Material Storage (IP Section 03.01) (2 Samples)

The inspectors evaluated the licensee's performance in controlling, labeling, and securing the following radioactive materials:

- (1) Interim Radwaste storage facility
- (2) Unit 1 Sealand yard

Radioactive Waste System Walkdown (IP Section 03.02) (2 Samples)

The inspectors walked down the following accessible portions of the solid radioactive waste systems and evaluated system configuration and functionality:

- (1) Resins associated with the ALPS system
- (2) Bags and barrels in the radwaste storage bins

Waste Characterization and Classification (IP Section 03.03) (4 Samples)

The inspectors evaluated the following characterization and classification of radioactive waste:

- (1) ALPS Cation Resin
- (2) DAW Smears
- (3) Fuel Pool Resin
- (4) ALPS Anion Resin

Shipment Preparation (IP Section 03.04) (1 Sample)

- (1) The inspectors observed the preparation of radioactive shipment DW-23-026

Shipping Records (IP Section 03.05) (4 Samples)

The inspectors evaluated the following non-excepted radioactive material shipments through a record review:

- (1) DW-22-020; Resin Cask; LSA-II
- (2) DW-22-010; Fuel Pool Cleanup Resin; LSA-II
- (3) DW-23-001; DAW Trash; LSA-II
- (4) DW-23-020; ALPS Resin; LSA-II

OTHER ACTIVITIES—BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

MS08: Heat Removal Systems (IP Section 02.07) (2 Samples)

- (1) Unit 2 (July 1, 2022 through June 30, 2023)
- (2) Unit 3 (July 1, 2022 through June 30, 2023)

MS09: Residual Heat Removal Systems (IP Section 02.08) (2 Samples)

- (1) Unit 2 (July 1, 2022 through June 30, 2023)
- (2) Unit 3 (July 1, 2022 through June 30, 2023)

MS10: Cooling Water Support Systems (IP Section 02.09) (2 Samples)

- (1) Unit 2 (July 1, 2022 through June 30, 2023)
- (2) Unit 3 (July 1, 2022 through June 30, 2023)

BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (2 Samples)

- (1) Unit 1 (November 1, 2022 through May 31, 2023)
- (2) Unit 2 (November 1, 2022 through May 31, 2023)

OR01: Occupational Exposure Control Effectiveness Sample (IP Section 02.15) (1 Sample)

- (1) November 1, 2022 through May 31, 2023

PR01: Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual
Radiological Effluent Occurrences (RETS/ODCM) Radiological Effluent Occurrences Sample
(IP Section 02.16) (1 Sample)

- (1) November 1, 2022 through May 31, 2023

71152A - Annual Follow-up Problem Identification and Resolution

Annual Follow-up of Selected Issues (Section 03.03) (1 Sample 1 Partial)

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

- (1) Non-safety-related components installed in the Unit 2 125V DC alternate battery feed circuit breakers, which require safety-related components, as documented in CR 4688989
- (2) (Partial)
2/3 emergency diesel generator output breaker opened unexpectedly during surveillance run

INSPECTION RESULTS

Licensee-Identified Non-Cited Violation	71111.15
This violation of very low safety significance was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.	
<u>Enforcement:</u> Violation: Dresden Nuclear Power Station, Unit 2, Renewed Facility Operating License, section 2.E requires that the licensee implement and maintain in effect all provisions of the approved fire protection program. The approved fire protection plan requires compensatory measures are established when fire protection SSCs are impaired. Procedure CC-AA-211, "Fire Protection Program," Revision 9, details the fire protection and prevention administrative control procedures are established to govern the handling and use of transient combustible materials, maintain housekeeping to minimize fire hazards, control cutting and welding operations by use of a permit system, control the use of temporary heating sources, control the impairment of fire protection SSCs, and post fire watches. Procedure OP-AA-201-007,	

“Fire Protection System Impairment Control,” Revision 2, provides instructions for establishing and performing compensatory measure fire watch inspections. Last, procedure OP-AA-108-101, “Control of Equipment and System Status,” Revision 18, addresses the identification of temporary equipment conditions and status via the Abnormal Component Position Sheets (ACPS) and Equipment Status Tags.

Contrary to the above, on August 4, 2023, the licensee failed to implement provisions of the approved fire protection program. Specifically, the site terminated the continuous fire watch previously established when valve 2-4415-500, Fire Protect H2 Seal Unit Deluge System SV, was taken to the closed position. The fire watch was terminated without restoring the valve to the open position. This is contrary to the guidance and requirements established in the procedures requiring a continuous fire watch until the valve was restored to its normal position, open.

Significance/Severity: Green. Specifically, the inspectors determined that this finding screened to Green because the degraded or non-functional detection or fixed suppression system did not adversely affect the ability of the system to protect any equipment important to safe shutdown.

Corrective Action References: AR 4696111, Impairment closed out improperly

Failure to Perform Performance Response Check for Instrumentation

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Occupational Radiation Safety	Green NCV 05000237,05000249/2023003-01 Open/Closed	[H.11] - Challenge the Unknown	71124.08

The inspectors identified a finding of very low safety significance (Green), and an associated non-cited violation of Technical Specification 5.4.1, “Procedures,” for the licensee’s failure to implement procedures for control of radioactivity. Specifically, the licensee did not conduct a performance source check on a frisker used to perform critical surveys of personnel for release from the radiologically controlled area to unrestricted areas as required by procedure RP-AA-700, “Controls for Radiation Protection Instrumentation.”

Description:

Licensee procedure RP-AA-700, “Controls for Radiation Protection Instrumentation” establishes the administrative controls for radiation protection instrumentation maintained for use at the Dresden Station. Step 4.9.5 describes the source response checks for portable survey instruments and stationary GM friskers and states “Except as noted below, short-term issued portable survey meters and stationary GM friskers shall be performance checked daily or prior to use, whichever is less frequent.” Step 4.9.5.6 (a defined exception to the daily frequency) states, “Portable survey instruments and stationary GM friskers may be performance source checked weekly in accordance with this section, provided they are not used for critical surveys.” Procedure RP-AA-700, “Controls for Radiation Protection Instrumentation” Step 2.9 defines a critical survey as “Surveys of personnel or materials for release for unrestricted use...”

On July 3, 2023, the personnel contamination monitor at the radwaste control room was removed from service. This monitor surveyed personnel leaving the radiologically controlled

area (RCA) into the unrestricted area. Removing the personnel contamination monitor from service required personnel to use a stationary hand-held frisker to perform the critical radiological surveys necessary to leave the RCA. Consequently, the performance source check frequency should have changed from weekly to daily for this stationary frisker when it was used for these critical surveys.

On July 17, 2023, the frisker successfully passed the performance source check. On July 19, 2023, the inspectors identified that frisker appeared non-responsive to background radiation with only an occasional click, with long intervals of silence. It was explained that the area was low background. However, when radiation protection personnel conducted a performance source check the as-found condition of the instrument was not within acceptance criteria for the response check.

Corrective Actions: The licensee changed the performance source check frequency for this frisker, and other friskers located at RCA exit points, to a daily frequency. Additionally, the licensee performed radiological survey 2023-197910 of the area likely impacted (radwaste control room) by this performance deficiency and demonstrated radioactive contamination was not identified in the unrestricted area.

Corrective Action References: AR 04691430

Performance Assessment:

Performance Deficiency: The licensee did not conduct a performance source check a frisker used to perform critical surveys of personnel for release from the radiologically controlled area to unrestricted areas as required by procedure RP-AA-700, "Controls for Radiation Protection Instrumentation."

Screening: The inspectors determined the performance deficiency was more than minor because it could reasonably be viewed as a precursor to a significant event. The performance deficiency had the potential to lead to a more significant radiation safety concern because of an ineffective radiation program barrier. Specifically, when response checked, the as-found condition of the instrument was not within acceptance criteria for the response check.

This is Example 6.b from Inspection Manual Chapter 0612 Appendix E "Examples of Minor Issues."

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix C, "Occupational Radiation Safety SDP." The finding was determined to be of very low safety significance (Green) in accordance with Inspection Manual Chapter 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," dated August 19, 2008, because: (1) it did not involve as-low-as-reasonably-achievable (ALARA) planning or work controls, (2) there was no overexposure, (3) there was no substantial potential for an overexposure, and (4) the ability to assess dose was not compromised.

Cross-Cutting Aspect: H.11 - Challenge the Unknown: Individuals stop when faced with uncertain conditions. Risks are evaluated and managed before proceeding. Specifically, when radiation protection removed the personnel contamination monitor from service the risk from potentially inadequate surveys from the inferior replacement equipment was not recognized, evaluated, or managed.

Enforcement:

Violation: Technical Specification 5.4.1, Procedures, states in part, “written procedures shall be established, implemented and maintained covering activities contained in Regulatory Guide 1.33, Revision 2, Appendix-A, dated February 1978.”

NRC Regulatory Guide 1.33, Appendix A, Section 7 addresses “Procedures for Control of Radioactivity,” and Section e. “Radiation Protection Procedures,” (4) addresses Contamination Control.

Licensee procedure RP-AA-700 “Controls for Radiation Protection Instrumentation,” Revision 09, provides requirements for instrumentation used to survey potentially contaminated personnel and materials before being released to unrestricted areas (a critical survey). Step 4.9.5 requires stationary GM friskers used for critical surveys shall be performance source checked daily.

Contrary to the above, between July 3 and July 19, 2023, the licensee failed to implement step 4.9.5 of procedure RP-AA-700. Specifically, the licensee failed to conduct daily performance source checks as required for a frisker used for critical surveys as required by the procedure.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Enforcement
Discretion

Enforcement Action EA-23-087:
Failure to Comply with 10 CFR Part 37

71124.08

Description:

On April 27, 2016, the licensee was issued NRC Inspection Report Nos. 05000237/2016405 and 05000249/2016405, which documented a licensee-identified violation of 10 CFR Part 37, Physical Protection of Category 1 and Category 2, Quantities of Radioactive Material at Facilities with a 10 CFR Part 73, Physical Protection Program. The violation met the criteria for enforcement discretion as described in Enforcement Guidance Memorandum (EGM) 14-001, “Interim Guidance for Dispositioning 10 CFR Part 37 Violations with Respect to Large Components or Robust Structures Containing Category 1 or Category 2 Quantities of Material at Power Reactor Facilities Licensed Under 10 CFR Parts 50 and 52.”

Subsequently, the inspectors re-evaluated this activity and found that while a violation of regulatory requirements continues to exist, the conditions remain within the criteria for enforcement discretion established within EGM 14-001.

Corrective Actions: As specified in EGM 14-001, the application of discretion is authorized until the underlying technical issue is dispositioned through rulemaking or other regulatory action.

Enforcement:

Violation: On April 27, 2016, a violation of 10 CFR Part 37 was documented in Dresden Inspection Report Nos. 05000237/2016405 and 05000249/2016405. The inspectors determined that the previously identified violation remains.

Basis for Discretion: This violation met the criteria for enforcement discretion as described in Enforcement Guidance Memorandum (EGM) 14-001, "Interim Guidance for Dispositioning 10 CFR Part 37 Violations with Respect to Large Components or Robust Structures Containing Category 1 or Category 2 Quantities of Material at Power Reactor Facilities Licensed Under 10 CFR Parts 50 and 52."

Failure to Install Safety-Related Circuit Breakers in the Unit 2 Alternate Battery, a Safety-Related System			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000237,05000249/2023003-02 Open/Closed	None (NPP)	71152A
<p>A self-revealed finding of very low safety significance (Green) and associated non-cited violation (NCV) of 10 CFR 50 Appendix B, Criterion III, occurred on July 6, 2023, when it was identified that non-quality controlled, non-dedicated circuit breakers were installed in the Unit 2 125VDC alternate battery, a safety-related system.</p> <p><u>Description:</u></p> <p>Around 1978, the 125V DC distribution panel number 5 and two GE model AK circuit breakers were originally installed in the Unit 1 HPCI building for the U1 HPCI 125V DC battery and charger. The original design for the components was U1 Division I Engineered Safety Feature, meaning the components were classified as safety-related (SR). Controlled drawings, on the record, identified “nuclear safety-related equipment is shown on this drawing,” which implied that SR quality equipment was procured and installed around this timeframe.</p> <p>In the 1990s, a modification, SR modification M12-0-90-013A “125 vdc Alternate Battery Installation,” was approved for the installation of a new U2 safety-related 125V DC alternate battery. This installation was to be in the U1 HPCI building, as well as SR cable connections from distribution panel number 5 to the U2 Turbine Building SR 125V DC Bus 2A-1. The modification repurposed the two SR GE model AK circuit breakers that were previously installed for the U1 HPCI 125V DC battery and charger to be used now for the new U2 alternate battery and charger. In 1991, a letter was issued from the NRC to Dresden Nuclear Station to follow up on discussions regarding the 125V DC alternate batteries. The letter included a description of the 125 VDC System design, an overview of the alternate 125 VDC battery design and installation, an overview of the Technical Specification changes to be proposed, and a schedule for submittal of these amendments, and the controls which will be imposed on any alternate battery usage prior to receipt of the amended Technical Specifications. The letter discussed the ability of the alternate battery to be put into service when the main battery is unavailable. Classification was established and controlled in plant documentation.</p> <p>In 2003, the originally installed AK-25 circuit breaker, Equipment Part Number (EPN) 2-83125-5AC2, failed to close and a vendor overhaul was performed. The installed circuit breakers did not have a catalog identification number associated with them. The site planned to procure a new circuit breaker to install while the failed circuit breaker was being overhauled. A Quality Level 4 (QL-4), or non-safety-related, catalog identification number was created. The work order created to install a new circuit breaker classified the work as non-safety related (NSR), and a NSR breaker was installed on March 26, 2004. This was a missed opportunity, as the correct quality level for the component should have been QL-1, safety related.</p>			

In 2006, the site underwent a 16-year breaker overhaul for the original SR AK-50 circuit breaker, EPN 2-83125-5AC1. In the work order for this overhaul, the circuit breaker was incorrectly noted to be a non-safety-related, augmented quality component, or QL-3. This was another missed opportunity for the site to identify the circuit breakers were supposed to be safety related, QL-1 components.

In 2011, an engineering change request (ECR) was done to add a safety classification to the U2 125V DC alternate battery circuit breakers in the Passport computer system due to the information being blank. The ECR noted the components were classified as safety-related, seismic class 1E components. In 2012, the ECR was completed with the safety classification information being filled in, but no reviews were conducted to look at work performed while the information in Passport was incomplete. This resulted in the site not being aware of the non-safety-related circuit breakers being installed.

In 2023, the site was preparing for the 16-year preventative maintenance on the Unit 2 125V DC alternate battery circuit breakers; it was discovered that the currently installed circuit breakers were non-safety-related components. A condition report was written, and the site performed a corrective action program evaluation (CAPE) to determine the cause of non-safety-related components being installed and maintained for a safety-related function.

The inspectors reviewed the condition report, CAPE, relevant associated documentation, and held discussions with the licensee staff to better understand the time frame and history of the circuit breakers and the U2 125V DC alternate battery. The inspectors questioned if the ECR in 2011-2013 would have involved reviewing the currently installed components at that time to see if they matched the missing safety classification. The site stated that nothing specific would have prompted that review in the engineering change request process. The licensee informed the inspectors they would be procuring QL-1 circuit breakers to install during the planned 16-year preventative maintenance scheduled for September 2023.

Corrective Actions: Corrective actions included, but were not limited to, the site conducting a CAPE and replacement of the non-safety-related circuit breakers with safety-related circuit breakers on September 15, 2023.

Corrective Action References: CR 4688989, U2 125VDC Alt Battery Feed Circuit Breakers, SR Components Required

Performance Assessment:

Performance Deficiency: The inspectors determined the licensee's failure to ensure safety-related circuit breakers were installed in the Unit 2 alternate battery, a safety-related system in accordance with 10 CFR 50 Appendix B, Criterion III, was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. This determination was informed by IMC 0612, Appendix E, example 5.c, due to non-safety-related components, circuit breakers, being installed in the plant and the safety-related system, Unit 2 125 VDC alternate battery, returned to service.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors answered "yes" to question A1 in Exhibit 2 – "Mitigating Systems Screening Question." This resulted in the issue screening to green.

Cross-Cutting Aspect: Not Present Performance. No cross-cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance.

Enforcement:

Violation: 10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires, in part, measures be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components.

Contrary to the above, from March 26, 2004, to July 6, 2023, the licensee failed to review for suitability of application of parts essential to the safety-related functions of the Unit 2 alternate battery. Specifically, the licensee found non-safety-related circuit breakers were installed when safety-related components were required to be installed in the Unit 2 alternate battery.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

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

- On October 18, 2023, the inspectors presented the integrated inspection results to P. Boyle, Site Vice President, and other members of the licensee staff.
- On July 21, 2023, the inspectors presented the radiation protection inspection results to C. Joseph, Plant Manager, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Drawings	M-22	Diagram of Service Water Piping	EZ
71111.04	Drawings	M-29	Diagram of Low Pressure Coolant Injection Piping, Sheet 1	CR
71111.04	Drawings	M-347	Diagram of Reactor Feed Piping	CK
71111.04	Drawings	M-51	Diagram of High Pressure Coolant Injection Piping	CX
71111.04	Procedures	DOP 1500-E1	Unit 2 Low Pressure Coolant Injection and Containment Cooling Service Water Electrical Checklist	15
71111.04	Procedures	DOP 1500-M1	Unit 2 Low Pressure Coolant Injection and Containment Cooling Valve Checklist	50
71111.04	Procedures	DOP 2300-M1/E1	Unit 2 High Pressure Coolant Injection System Checklist	40
71111.04	Procedures	DOP 3700-M2/E2	Unit 3 RBCCW System Checklist	20
71111.04	Procedures	DOP 3900-E1	Unit 2(3) Service Water and Screen Wash System Electrical Checklist	14
71111.04	Procedures	DOP 3900-M1	Unit 2/3 Service Water and Screen Wash Valve Checklist	64
71111.04	Procedures	DOP 3900-M2	Unit 2 Emergency Room Coolers Valve Checklist	9
71111.05	Corrective Action Documents	4698552	4.0 Critique Crew 5 Q3 Announced Fire Drill	08/25/2023
71111.05	Fire Plans	100 Prefire Plan Master Legend	Dresden Generating Station Pre-Fire Plan	3
71111.05	Fire Plans	101 U2RB-1	Unit 2 Torus Basement Elevation 476' and Torus Catwalk	4
71111.05	Fire Plans	103 U2RB-3	Unit 2 Southeast Corner Room Elev. 476'	4
71111.05	Fire Plans	120 U3RB-23	FZ 1.1.1.2 Unit 3 Rx Ground Floor Elev. 517'	5
71111.05	Fire Plans	124 U3RB-26	FZ 1.1.1.3 Unit 3 General Area Elev. 545'	6
71111.05	Fire Plans	133 U2TB-36	FZ 8.2.1A Unit 2 Condensate Pumps Elev. 469'	3
71111.05	Fire Plans	151 U2TB-53	Unit 2 Battery Room Elev. 549'	5
71111.05	Fire Plans	157 U3TB-68	FZ 8.2.1B Unit 3 Condensate Pumps Elev. 469'	4
71111.05	Fire Plans	196 Circ PPs-124	FZ 11.3 Unit 2/3 Circulating Water Pumps Elev. 490'	2
71111.05	Fire Plans	197 SW PPs-125	FZ 11.3 Unit 2/3 Service Water Pumps / Traveling Screens Elev. 509'	3
71111.05	Fire Plans	198 U2/3 CH-126	FZ 11.3 Unit 2/3 Crib House Ground Floor Elev. 517'	3
71111.05	Miscellaneous	Fire Drill Scenario 22-04	Diesel Generator Fire (IEMA Building)	08/10/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.05	Procedures	118 U3RB-21	FZ 11.1.2 Unit 3 Southeast Corner Room Elevation 476'	3
71111.05	Procedures	119 U3RB-22	FZ 11.1.3 Unit 3 High Pressure Coolant Injection Pump Room Elevation 476'	6
71111.06	Engineering Changes	390874	4KV Switchgear Internal Flood Barrier Protection Risk Insight - Enhancement Dash Buses 33-1 and 34-1	0
71111.06	Engineering Changes	393162	4KV Switchgear Internal Flood Barrier Protection Risk Insight - Enhancement Dash Buses 23-1 and 24-1	0
71111.06	Miscellaneous	DR-PSA-012	Dresden Internal Flood Evaluation Summary and Notebook	05
71111.11Q	Procedures	NF-AB-720-F-1	Control Rod Sequence Review and Approval Sheet	07/05/2023
71111.11Q	Procedures	NF-AB-720-F-5	Special Maneuver Rod Move Sheet Sequence ID: D228-019	07/05/2023
71111.11Q	Procedures	ReMA Plan D228-019	D2C28 End of Cycle Rod Pull - 9D and 9B Array	07/03/2023
71111.12	Corrective Action Documents	4442021	Unexpected Alarm 903-3 C-3, Isolation Condenser Vent Monitor Downscale	08/22/2021
71111.12	Corrective Action Documents	4551062	Unexpected Alarm 902-3 B-3 Isolation Condenser Vent Rad Hi	01/29/2023
71111.12	Corrective Action Documents	4676867	Unexpected Alarm 903-3 F-1 Area Rod Monitor Downscale	05/09/2023
71111.12	Corrective Action Documents	4678267	Unexpected Alarm 903-3 F-1 Area Rad Monitor Downscale	05/15/2023
71111.12	Corrective Action Documents	4681722	MCR Nuisance Alarm: 902-3 B-3 Isolation Condenser Vent Rad HI	05/31/2023
71111.12	Miscellaneous		Radiation Monitor System Health Report	
71111.12	Miscellaneous	WR 1540455	TS&R 3-1803-30, ARM 30 Off Gas Filter Building Spurious Alarms	05/15/2023
71111.12	Procedures	DIS 1300-04	Isolation Condenser Vent Radiation Monitor Functional Calibration and Operational Checks	31
71111.12	Work Orders	1233135	EWP Mechanical Maintenance 12 Year Preventative Maintenance 2B Station Blackout Diesel Generator, Replace Air Start FLEX Hoses	06/26/2023
71111.12	Work Orders	1233234	Unit 2 12-Year Preventative Maintenance Replace Starting Air Motor FLEX Hoses on Station Blackout	06/26/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.12	Work Orders	1638572	Unit 2 8-Year Preventative Maintenance Calibration Station Blackout Immersion Heater Temperature Switch 2-6620-119B	06/27/2023
71111.12	Work Orders	5121931	Electrical Maintenance 2-Year Preventative Maintenance Station Blackout Diesel Generator Electrical Inspection	06/29/2023
71111.12	Work Orders	5126475	EWP Unit 2 2-Year Preventative Maintenance Station Blackout Diesel Generator Mechanical Maintenance Inspection	06/29/2023
71111.12	Work Orders	5181428	Unexpected Alarm 903-3 C-3, Isolation Condenser Vent Monitor Downscale	12/14/2021
71111.12	Work Orders	5276782	IMD TSR 2B RBV Vent Rad Monitor	07/16/2022
71111.12	Work Orders	5371795	Rework, EWP Replace 3B RBV Stack Sample Pump	0
71111.12	Work Orders	5372150	TS&R U2 IC Vent Rad Monitor Nuisance Alarms	06/05/2023
71111.13	Corrective Action Documents	4697778	U2 Circ Water Pump Bearing Temperatures	08/22/2023
71111.13	Corrective Action Documents	4698205	U3 Circ Water Pump Motor Bearing Temps Peaking Above PPC Setpoint	08/24/2023
71111.13	Corrective Action Documents	4698424	Unexpected Alarm 923-2 C-2, TR81 TR83 TR86 Major	08/24/2023
71111.13	Miscellaneous		Workweek Highlights - DRESDEN Station Week of 08-21-23	08/25/2023
71111.13	Miscellaneous		Augmented Operator Round Points	08/23/2023
71111.13	Miscellaneous	DAN 902(3)-6 E-9	RFP Vent Exhaust Air Temp Hi	15
71111.13	Miscellaneous	DAN 932-2 C-2	TR81 TR83 TR86 Major	21
71111.13	Procedures	OP-DR-108-111-1001	Hot Weather Strategy	7
71111.13	Procedures	OP-DR-108-111-1006	Intake Blockage Station Response	0
71111.15	Corrective Action Documents	4535439	HPCI Check Valve 3-2301-7 Will Not Open < 90 ft/lbs. Torque	11/08/2022
71111.15	Corrective Action Documents	4688851	3-9400-121/5 U3 Battery Room A/C Compressor & Fan Breaker Tripped	07/05/2023
71111.15	Corrective Action	4694915	FLEX Hose Trailer 3 Not Tied Down	08/06/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents			
71111.15	Corrective Action Documents	4696111	Impairment Closed Out Improperly	08/12/2023
71111.15	Corrective Action Documents Resulting from Inspection	4694745	Time Critical Action 16 Paperwork Error	
71111.15	Corrective Action Documents Resulting from Inspection	4699214	NRC Questions on CC-DR-118	08/29/2023
71111.15	Engineering Evaluations	350673	Effects of Elevated Temperatures on Unit 3 Station Batteries	7
71111.15	Procedures	6600-06	Powering Unit 3 4 Kilovolt Buses Via the Station Blackout Diesel Generator 3	24
71111.15	Procedures	CC-AA-211	Fire Protection Program	9
71111.15	Procedures	CC-DR-118	Site Implementation of Diverse and Flexible Coping Strategies (FLEX), Spent Fuel Pool Instrumentation (SFPI), and Hardened Containment Vent System (HCVS) Program	8
71111.15	Procedures	DGA-12	Loss of Offsite Power	80
71111.15	Procedures	DOP 6600-05	Powering Unit 2 4 Kilovolt Buses Via the Station Blackout Diesel Generator 2	19
71111.15	Procedures	DOS 0010-47	Operations Monthly FLEX Inspections	12
71111.15	Procedures	DOS 2300-04	HPCI Testable Check Valve Manual Full Stroke Operability Test	15
71111.15	Procedures	OP-AA-102-106	Operator Response Time Validation Sheet	5
71111.15	Procedures	OP-AA-108-101 Attachment 2	Abnormal Component Position Sheet (ACPS)	18
71111.15	Procedures	OP-AA-201-007	Fire Protection System Impairment Control	2
71111.15	Work Orders	5096300	QTR/CSD IST HPCI Test Injection Check Valve Operability Test Surveillance	11/07/2022
71111.15	Work Orders	5308040-07	OP PMT Perform as Left Seat Leak Test Per DOS 7100-06	11/13/2022
71111.15	Work Orders	5308040-08	OP PMT IST HPCI Test Injection Check Valve 3-230-7 Full Stroke	11/13/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.18	Engineering Changes	638300	Temporary Aux Oil Reservoir with Remote Oil Fill for 3B Reactor Recirculating Pump Motor Lower Bearing	0
71111.18	Engineering Changes	638300	Temporary Aux Oil Reservoir with Remote Oil Fill for 3B Reactor Recirculating Pump Motor Lower Bearing	3
71111.18	Engineering Changes	638300	Temporary Aux Oil Reservoir with Remote Oil Fill for 3B Reactor Recirculating Pump Motor Lower Bearing	4
71111.18	Engineering Changes	639377	Temporary Force Unit 2 DEHC Logic Point for Axial Position 1 Probe	0
71111.18	Procedures	CC-AA-112-F-03	Temporary Configuration Change (TCC) Installation and Removal Authorizations	2
71111.18	Procedures	LS-AA-104	Exelon 50.59 Review Process	12
71111.24	Corrective Action Documents	4689928	U3 SBO Would Not Synchronize to Bus 33	07/11/2023
71111.24	Corrective Action Documents	4698273	Unexpected Alarm: 903-4 G-24 Fuel Pool PP Trip	08/24/2023
71111.24	Corrective Action Documents	4698754	4.0 Critique for 3B Fuel Pool Cooling Pump Trip on 8/24/23	08/27/2023
71111.24	Corrective Action Documents Resulting from Inspection	4689636	NRC Question: 2/3 Emergency Diesel Generator Cooling Water Pump In-Service Testing Work Order 5354595	07/10/2023
71111.24	Corrective Action Documents Resulting from Inspection	4690019	NRC ID: Documentation for DOS 6600-08 Incomplete	07/12/2023
71111.24	Procedures	DOS 6620-07	SBO Unit 2 (3) Diesel Generator Surveillance Tests	49
71111.24	Work Orders	5382485-01	EM EWP Breaker Swap Cubicle 3 at Bus 71 (Feed to Bus 33)	07/21/2023
71111.24	Work Orders	5391951	U2 EDG Control Switch Contacts Need to be Burnished	08/28/2023
71111.24	Work Orders	5394386	IMD replace 3-1901-108B (3B Fuel Pool Cooling Pump Suction)	08/25/2023
71124.08	Corrective Action Documents Resulting from	AR 04691430	NRC ID: Inaccurate Frisking Instructions	07/19/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Inspection			
71124.08	Corrective Action Documents Resulting from Inspection	AR 04691476	NRC Identified: Frisker Probe Found Broken	07/19/2023
71124.08	Miscellaneous		Dresden Generating Station Part 37 Security Plan for the Protection of Category 1 and Category 2 Quantities of Radioactive Material	4
71124.08	Miscellaneous	DRE-23-001	Leak Test Exemption for Ni-63 Sources Used in Explosive Monitors at Dresden	08/07/2023
71124.08	Miscellaneous	MA001122	Entry Scan 4 User Manual	4
71124.08	Miscellaneous	MA001153	Itemiser3 Enhanced User Manual	2
71124.08	Miscellaneous	N-AN-RP-10CFR37-CBT	Exelon 10 CFR Part 37, Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material	0
71124.08	Miscellaneous	TBE Sample ID L95508-7	Waste Stream Review and Scaling Factor Report - ALPS Cation Resin	07/21/2021
71124.08	Miscellaneous	TBE Sample ID L95508-1	Waste Stream Review and Scaling Factor Report - DAW Smears	11/19/2021
71124.08	Miscellaneous	TBE Sample ID L95508-3	Waste Stream Review and Scaling Factor Report - Fuel Pool Resin	10/04/2021
71124.08	Miscellaneous	TBE Sample ID L95508-6	Waste Stream Review and Scaling Factor Report - ALPS Anion Resin	01/11/2022
71124.08	Procedures	RP-AA-700	Controls for Radiation Protection Instrumentation	09
71124.08	Procedures	RP-AA-800	Control, Inventory, and Leak Testing of Radioactive Sources	10
71124.08	Self-Assessments	AR 467223-02	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	06/30/2023
71124.08	Shipping Records	DAW-23-020	Shipping Papers; ALPS Resin	06/06/2023
71124.08	Shipping Records	DW-22-010	Shipping Papers; Fuel Pool Cleanup Resin	06/21/2022
71124.08	Shipping Records	DW-22-020	Shipping Papers; RWCU Resin	08/04/2022
71124.08	Shipping Records	DW-23-001	Shipping Papers; DAW Trash	02/16/2023
71124.08	Work Orders	Work Order 05331539	Quarterly Radwaste Facility Container Inspection	05/02/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71151	Miscellaneous		MSPI Heat Removal Systems Prepared Data Package	07/01/2023–06/30/2023
71151	Miscellaneous		MSPI Residual Heat Removal Systems Prepared Data Package	07/01/2023–06/30/2023
71151	Miscellaneous		MSPI Cooling Water Systems Prepared Data Package	07/01/2023–06/30/2023
71151	Miscellaneous	LS-AA-2090	Monthly Data Elements for NRC ROP Indicator - RCS Specific Activity	various
71151	Miscellaneous	LS-AA-2150	Monthly Data Elements for NRC ROP Indicator - RETS/ODCM Radiological Effluent Occurrences	various
71151	Procedures	ER-AA-2002	System and Equipment Health Monitoring	24
71151	Procedures	ER-AA-2008	Mitigating Systems Performance Index (MSPI) Monitoring and Margin Evaluation	4
71151	Procedures	LS-AA-2200	Mitigating System Performance Index Data Acquisition and Reporting	7
71152A	Corrective Action Documents	4332151	Strengthen Procedures Involving Torquing	04/02/2020
71152A	Corrective Action Documents	4360154	Procedure Revisions Required - Corporate Torque High Intensity Team Actions	07/31/2020
71152A	Corrective Action Documents	4551179	2/3 EDG Output Breaker Trip	01/30/2023
71152A	Corrective Action Documents	4688989	U2 125VDC Alt Battery Feed Circuit Breakers, SR Components Required	07/06/2023
71152A	Corrective Action Documents	4691063	U2 Extent of Condition Review from IR 4551179	07/17/2023
71152A	Corrective Action Documents	4691067	U3 Extent of Condition Review from IR 4551179	07/17/2023
71152A	Corrective Action Documents	4692803	U2 SBO Banana Jack Extent of Condition Walkdown	07/26/2023
71152A	Corrective Action Documents	4692804	U3 SBO Banana Jack Extent of Condition Walkdown	07/26/2023
71152A	Corrective Action Documents	4701304	Low Resistance Readings During Breaker Inspection	09/08/2023
71152A	Corrective Action	PI-AA-120	Issue Identification and Screening Process	10

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents			
71152A	Corrective Action Documents Resulting from Inspection	4687009	NRC Question: 2/3 EDG Banana Jacks	06/27/2023
71152A	Engineering Changes	387004	Add Safety Classification for U2 125 VDC Alt Batt/Chgr to Bus Breaker (EPN 2-83125-5AC1, Component S35)	04/30/2013
71152A	Miscellaneous	NO-AA-10	Quality Assurance Topical Report (QATR)	98
71152A	Procedures	CC-AA-304	Component Classification	6
71152A	Procedures	DIP 2100-28	Banana Jack Installation	15
71152A	Procedures	DIP 2100-28	Banana Jack Installation	16
71152A	Procedures	PI-AA-125	Corrective Action Program (CAP) Procedure	8
71152A	Work Orders	1785276	D2 4Y TSNC 125V Sta Main Batt Modified Performance Test	09/09/2019
71152A	Work Orders	4665278	D2/3 10 Year EDG Time Delay Relay (TDR3) Replacement	03/28/2019
71152A	Work Orders	509970	Replace Breaker for 125VDC Alt Chgr	03/25/2004
71152A	Work Orders	5387993	U2 SBO Banana Jack Extent of Condition Walkdown	08/09/2023
71152A	Work Orders	5387995	U3 SBO Banana Jack Extent of Condition Walkdown	08/09/2023
71152A	Work Orders	774334	D2 16Y Breaker Overhaul 125 Alt Tie Bkr	07/19/2006
71152A	Work Orders	N-C-0057	Torque Requirements	2