



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4125

April 30, 2009

Jeff Reinhart
Vice President
Omaha Public Power District
Fort Calhoun Station FC-2-4
P.O. Box 550
Fort Calhoun, NE 68023-0550

Subject: FORT CALHOUN STATION NRC INTEGRATED INSPECTION
REPORT 05000285/2009002

Dear Mr. Reinhart:

On March 31, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Fort Calhoun Station. The enclosed integrated inspection report documents the inspection findings, which were discussed on April 20, 2009, with you and other members of your staff.

The inspections examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents one self-revealing finding of very low safety significance (Green). This finding was determined to involve violations of NRC requirements. However, because of the very low safety significance and because it is entered into your corrective action program, the NRC is treating this finding as a noncited violation, consistent with Section VI.A.1 of the NRC Enforcement Policy. If you contest the violation or the significance of the noncited violation, 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, D.C. 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 612 E. Lamar Blvd, Suite 400, Arlington, Texas, 76011-4125; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the Fort Calhoun facility. In addition, if you disagree with the characterization of any finding 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 Regional Administrator, Region IV, and the NRC Resident Inspector at the Fort Calhoun Station. The information you provide will be considered in accordance with Inspection Manual Chapter 0305.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and its enclosure, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA G.Replogle for/

Jeffrey A. Clark, P.E.
Chief, Project Branch E
Division of Reactor Projects

Docket: 50-285
License: DPR-40

Enclosure:
NRC Inspection Report 05000285/2009002
w/Attachment: Supplemental Information

cc w/Enclosure:
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**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket: 50-285

License: DPR-40

Report: 05000285/2009002

Licensee: Omaha Public Power District

Facility: Fort Calhoun Station

Location: Fort Calhoun Station FC-2-4 Adm.
P.O. Box 399, Highway 75 - North of Fort Calhoun
Fort Calhoun, Nebraska

Dates: January 1 through March 31, 2009

Inspectors: J. Hanna, Senior Resident Inspector
J. Kirkland, Resident Inspector

Approved By: Jeffrey A. Clark, Chief, Project Branch E
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000285/2009002; 01/01/2009 – 03/31/2009; Fort Calhoun Station, Integrated Resident and Regional Report; Identification and Resolution of Problems.

The report covered a 3-month period of inspections by resident inspectors. One Green noncited violation of significance was identified. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609, "Significance Determination Process." Findings for which the significance determination process does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified Findings and Self-Revealing Findings

Cornerstone: Mitigating Systems

- Green. A self-revealing noncited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," was identified for the licensee's failure to take prompt corrective measures after identifying that water could penetrate cracks in the turbine building concrete floor and adversely impact the operability of an emergency diesel generator and safety related switchgear. Cracks in the floor of turbine building mechanical equipment room were identified in February 2006, when water was observed leaking into the Diesel Generator 1 room (Room 63). The licensee took no immediate corrective actions to evaluate or repair the cracks. In February 2009, water was again observed leaking into Room 63, resulting in unexpected tripping of breakers associated with the Diesel Generator 1, secondary compressor motor starter. The licensee entered this issue into their corrective action program as Condition Report 2009-0687.

This finding was more than minor because the failure to perform adequate corrective actions on the turbine building floor, if left uncorrected, could become a more serious safety concern. Specifically, water could seep through the floor and render the emergency diesel generator and/or safety related switchgear inoperable. Using the Manual Chapter 0609, "Significance Determination Process," Attachment 4 "Phase 1-Initial Screening and Characterization of Findings," this finding was of very low safety significance because it: 1) was confirmed to result in a loss of functionality of the secondary compressor motor starter; 2) did not represent a loss of safety function; 3) did not result in a loss of a technical specification required train for more than its allowed outage time; 4) did not result in a loss of risk significant equipment for more than 24 hours; and 5) did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding did not have a crosscutting aspect because the performance deficiency was aged and not indicative of current licensee performance (Section 40A2).

B. Licensee-Identified Violations

None

REPORT DETAILS

Summary of Plant Status

The unit began this inspection period in Mode 1 at full rated thermal power and operated at approximately 100 percent for the duration of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

1R01 Adverse Weather Protection (71111.01)

.1 Readiness for Seasonal Extreme Weather Conditions

a. Inspection Scope

The inspectors performed a review of the licensee's adverse weather procedures for seasonal extremes (e.g. extreme high temperatures, extreme low temperatures, or hurricane season preparations). The inspectors: verified that weather-related equipment deficiencies identified during the previous year were corrected prior to the onset of seasonal extremes; and evaluated the implementation of the adverse weather preparation procedures and compensatory measures for the affected conditions before the onset of, and during, the adverse weather conditions.

During the inspection, the inspectors focused on plant-specific design features and the licensee's procedures used to mitigate or respond to adverse weather conditions. Additionally, the inspectors reviewed the Updated Safety Analysis Report and performance requirements for systems selected for inspection, and verified that operator actions were appropriate as specified by plant-specific procedures. Specific documents reviewed during this inspection are listed in the attachment. The inspectors also reviewed corrective action program items to verify that the licensee was identifying adverse weather issues at an appropriate threshold and entering them into their corrective action program in accordance with station corrective action procedures. The inspectors' reviews focused specifically on the following plant systems:

- February 28, 2009, review of preparations for frazil ice monitoring and the actions required to protect the raw water, circulating water, and fire protection systems

These activities constitute completion of one readiness for seasonal adverse weather sample as defined in Inspection Procedure 71111.01-05.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignments (71111.04)

.1 Partial Walkdown

a. Inspection Scope

The inspectors performed partial system walkdowns of the following risk-significant systems:

- March 17, 2009, Portions of the auxiliary feedwater system including the diesel-driven Pump FW-54
- March 23, 2009, Portions of the main feed and condensate systems while Valve FW-2B was removed from service
- March 24, 2009, Portions of the raw water system while repairs were conducted on Valve HCV-2875A

The inspectors selected these systems based on their risk significance relative to the reactor safety cornerstones at the time they were inspected. The inspectors attempted to identify any discrepancies that could affect the function of the system, and, therefore, potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, Updated Safety Analysis Report, technical specification requirements, administrative technical specifications, outstanding work orders, condition reports, and the impact of ongoing work activities on redundant trains of equipment in order to identify conditions that could have rendered the systems incapable of performing their intended functions. The inspectors also walked down accessible portions of the systems to verify system components and support equipment were aligned correctly and operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no obvious deficiencies. The inspectors also verified that the licensee had properly identified and resolved equipment alignment problems that could cause initiating events or impact the capability of mitigating systems or barriers and entered them into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of three partial system walkdown samples as defined in Inspection Procedure 71111.04-05.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Quarterly Fire Inspection Tours

a. Inspection Scope

The inspectors conducted fire protection walkdowns that were focused on availability, accessibility, and the condition of firefighting equipment in the following risk-significant plant areas:

- February 25, 2009, Fire Area 46.1, turbine building mechanical equipment room (elevation 1036 feet), Room 82
- February 25, 2009, Fire Area 46.2, turbine building elevations 990 feet through 1036 feet
- March 2, 2009, Fire Area 34B, upper electrical penetration room, Room 57
- March 17, 2009, Fire Area 46.3, start-up feedwater Pump FW-54 enclosure, Room B-7

The inspectors reviewed areas to assess if licensee personnel had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant; effectively maintained fire detection and suppression capability; maintained passive fire protection features in good material condition; and had implemented adequate compensatory measures for out-of-service, degraded or inoperable fire protection equipment, systems, or features, in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall contribution to internal fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to affect equipment that could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the attachment, the inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use; that fire detectors and sprinklers were unobstructed, that transient material loading was within the analyzed limits; and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's corrective action program. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four quarterly fire-protection inspection samples as defined in Inspection Procedure 71111.05-05.

b. Findings

No findings of significance were identified.

.2 Annual Fire Protection Drill Observation (71111.05A)

a. Inspection Scope

On February 7, 2009, the inspectors observed a fire brigade activation resulting from a simulated fire in the main transformer, T-1. The observation evaluated the readiness of the plant fire brigade to fight fires. The inspectors verified that the licensee staff identified deficiencies; openly discussed them in a self-critical manner at the drill debrief, and took appropriate corrective actions. Specific attributes evaluated were: (1) proper wearing of turnout gear and self-contained breathing apparatus; (2) proper use and layout of fire hoses; (3) employment of appropriate fire fighting techniques; (4) sufficient firefighting equipment brought to the scene; (5) effectiveness of fire brigade leader communications, command, and control; (6) search for victims and propagation of the fire into other plant areas; (7) smoke removal operations; (8) utilization of pre planned strategies; (9) adherence to the preplanned drill scenario; and (10) drill objectives.

These activities constitute completion of one annual fire-protection inspection sample as defined in Inspection Procedure 71111.05-05.

b. Findings

No findings of significance were identified.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

The inspectors reviewed the Updated Safety Analysis Report, the flooding analysis, and plant procedures to assess susceptibilities involving internal flooding; reviewed the corrective action program to determine if licensee personnel identified and corrected flooding problems; inspected underground bunkers/manholes to verify the adequacy of sump pumps, level alarm circuits, cable splices subject to submergence, and drainage for bunkers/manholes; and verified that operator actions for coping with flooding can reasonably achieve the desired outcomes. The inspectors also walked down the one area listed below to verify the adequacy of equipment seals located below the flood line, floor and wall penetration seals, watertight door seals, common drain lines and sumps, sump pumps, level alarms, and control circuits, and temporary or removable flood barriers. Specific documents reviewed during this inspection are listed in the attachment.

- March 23, 2009, potential flooding in the diesel generator and switchgear rooms caused by a high energy line break in rooms 81 and 82

These activities constitute completion of one flood protection measures inspection sample as defined in Inspection Procedure 71111.06-05.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification Program (71111.11)

a. Inspection Scope

On February 19, 2009, the inspectors observed a crew of licensed operators in the plant's simulator to verify that operator performance was adequate, evaluators were identifying and documenting crew performance problems and training was being conducted in accordance with licensee procedures. The inspectors evaluated the following areas:

- Licensed operator performance
- Crew's clarity and formality of communications
- Crew's ability to take timely actions in the conservative direction
- Crew's prioritization, interpretation, and verification of annunciator alarms
- Crew's correct use and implementation of abnormal and emergency procedures
- Control board manipulations

- Oversight and direction from supervisors
- Crew's ability to identify and implement appropriate technical specification actions and emergency plan actions and notifications

The inspectors compared the crew's performance in these areas to pre-established operator action expectations and successful critical task completion requirements.

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one quarterly licensed-operator re-qualification program sample as defined in Inspection Procedure 71111.11.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

The inspectors evaluated degraded performance issues involving the following risk significant systems:

- March 5, 2009, Review of the maintenance rule scoping of fire protection & drainage systems given their crediting in the Fort Calhoun Station Probabilistic Risk Analysis
- March 3, 2009, Review of maintenance rule aspects to failed Reactor Protection System Channel 'C' on January 20, 2009

The inspectors reviewed events such as where ineffective equipment maintenance has resulted in valid or invalid automatic actuations of engineered safeguards systems and independently verified the licensee's actions to address system performance or condition problems in terms of the following:

- Implementing appropriate work practices
- Identifying and addressing common cause failures
- Scoping of systems in accordance with 10 CFR 50.65(b)
- Characterizing system reliability issues for performance
- Charging unavailability for performance
- Trending key parameters for condition monitoring
- Ensuring proper classification in accordance with 10 CFR 50.65(a)(1) or (a)(2)
- Verifying appropriate performance criteria for structures, systems, and components classified as having an adequate demonstration of performance through preventive maintenance, as described in 10 CFR 50.65(a)(2), or as requiring the establishment of

appropriate and adequate goals and corrective actions for systems classified as not having adequate performance, as described in 10 CFR 50.65(a)(1)

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the system. In addition, the inspectors verified maintenance effectiveness issues were entered into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two quarterly maintenance effectiveness samples as defined in Inspection Procedure 71111.12-05.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13)

a. Inspection Scope

The inspectors reviewed licensee personnel's evaluation and management of plant risk for the maintenance and emergent work activities affecting risk-significant and safety-related equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- January 8, 2009, Review of the yellow risk condition and associated risk management actions associated with performing a surveillance test on the diesel-driven auxiliary feedwater pump (FW-54) while the B-Cell, the diesel-driven fire pump (FP-1B), the "C" raw water pump (AC-10C) and "B" air compressor (CA-1B) were all out of service for maintenance
- February 12, 2009, Review of the yellow large early release frequency condition and associated risk management actions associated with performing engineered safety feature testing with bearing water cooling Pump CW-6B out-of-service for maintenance
- March 3, 2009, Review of the yellow risk condition and associated risk management actions associated with emergent repairs on the "A" charging pump (CH-1A) while the diesel driven auxiliary feedwater pump (FW-54) and the A-cell intake structure were out-of-service for maintenance
- March 25, 2009, Review of the yellow risk condition and associated risk management actions associated with taking the steam-driven auxiliary feedwater pump (FW-10) out-of-service while the "B" main feed pump (FW-2B) was out-of-service for one week

The inspectors selected these activities based on potential risk significance relative to the reactor safety cornerstones. As applicable for each activity, the inspectors verified that licensee personnel performed risk assessments as required by 10 CFR 50.65(a)(4) and that the assessments were accurate and complete. When licensee personnel performed emergent work, the inspectors verified that the licensee personnel promptly assessed and managed plant risk. The inspectors reviewed the scope of maintenance work, discussed the results of the assessment with the licensee's probabilistic risk analyst or shift technical advisor, and verified plant conditions were consistent with the risk assessment. The inspectors also

reviewed the technical specification requirements and inspected portions of redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four maintenance risk assessments and emergent work control inspection samples as defined in Inspection Procedure 71111.13-05.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following issues:

- January 14, 2009, Review of immediate operability issue associated with the seismic restraint SIS-185.
- January 23, 2009, Review of operability of Valve HCV-2893 following two stroke times in the alert range on January 4, 2009
- February 26, 2009, Review of operability of steam driven auxiliary feedwater pump (FW-10) following a failure to start after maintenance
- March 20, 2009, Review of operability of diesel generators given the simultaneous tripping of three electrical breakers

The inspectors selected these potential operability issues based on the risk-significance of the associated components and systems. The inspectors evaluated the technical adequacy of the evaluations to ensure that technical specification operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the technical specifications and Updated Safety Analysis Report to the licensee's evaluations, to determine whether the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations. Additionally, the inspectors also reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four operability evaluations inspection samples as defined in Inspection Procedure 71111.15-05

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed the following postmaintenance activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

- January 26, 2009, postmaintenance testing following the rebuild of Valve HCV-2880B, the raw water outlet valve for 1A component cooling water/raw water heat exchange
- February 26, 2009, postmaintenance testing following speed adjustment on the steam-driven auxiliary feedwater pump (FW-10)
- March 16, 2009, postmaintenance testing following maintenance on the raw water pump (AC-10B)
- March 27, 2008, postmaintenance testing following the rebuild of Valve HCV-2875A, the raw water pump discharge header isolation valve
- March 5, 2009, postmaintenance testing of the diesel driven auxiliary feedwater pump (FW-54) following maintenance on the diesel engine

The inspectors selected these activities based upon the structure, system, or component's ability to affect risk. The inspectors evaluated these activities for the following (as applicable):

- The effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed
- Acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate

The inspectors evaluated the activities against the technical specifications, the Updated Safety Analysis Report, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications to ensure that the test results adequately ensured that the equipment met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with postmaintenance tests to determine whether the licensee was identifying problems and entering them in the corrective action program and that the problems were being corrected commensurate with their importance to safety. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of five postmaintenance testing inspection samples as defined in Inspection Procedure 71111.19-05.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the Updated Safety Analysis Report, procedure requirements, and technical specifications to ensure that the four surveillance activities listed below demonstrated that the systems, structures, and/or components tested were capable of performing their intended safety functions. The inspectors either witnessed or reviewed test data to verify that the significant surveillance test attributes were adequate to address the following:

- Preconditioning
- Evaluation of testing impact on the plant
- Acceptance criteria
- Test equipment
- Procedures
- Jumper/lifted lead controls
- Test data
- Testing frequency and method demonstrated technical specification operability
- Test equipment removal
- Restoration of plant systems
- Fulfillment of ASME Code requirements
- Updating of performance indicator data
- Engineering evaluations, root causes, and bases for returning tested systems, structures, and components not meeting the test acceptance criteria were correct
- Reference setting data
- Annunciators and alarms setpoints

The inspectors also verified that licensee personnel identified and implemented any needed corrective actions associated with the surveillance testing.

- January 15, 2009, Field observation of the quarterly surveillance of motor-driven auxiliary feedwater Pump FW-6 recirculation Valve FCV-1368 and Check Valves FW-173 and FW-174
- January 27, 2009, Field observations of the periodic test of the 13.8 kV emergency power
- January 27, 2009, Testing of emergency 13.8 kV power supply

- March 13, 2009, "Raw Water System Category C Valve Inservice Test"

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four surveillance testing inspection samples as defined in Inspection Procedure 71111.22-05 (three routine surveillance tests and one inservice test).

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

.1 Training Observations

a. Inspection Scope

The inspectors observed a simulator training evolution for licensed operators on January 28, 2009, which required emergency plan implementation by a licensee operations crew. This evolution was planned to be evaluated and included in performance indicator data regarding drill and exercise performance. The inspectors observed event classification and notification activities performed by the crew. The inspectors also attended the post evolution critique for the scenario. The focus of the inspectors' activities was to note any weaknesses and deficiencies in the crew's performance and ensure that the licensee evaluators noted the same issues and entered them into the corrective action program. As part of the inspection, the inspectors reviewed the scenario package and other documents listed in the attachment.

These activities constitute completion of one sample as defined in Inspection Procedure 71114.06-05.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Data Submission Issue

a. Inspection Scope

The inspectors performed a review of the data submitted by the licensee for the fourth quarter 2008 performance indicators for any obvious inconsistencies prior to its public release in accordance with Inspection Manual Chapter 0608, "Performance Indicator Program."

This review was performed as part of the inspectors' normal plant status activities and, as such, did not constitute a separate inspection sample.

b. Findings

No findings of significance were identified.

.2 Unplanned Scrams per 7000 Critical Hours

a. Inspection Scope

The inspectors sampled licensee submittals for the Unplanned Scrams per 7000 Critical Hours performance indicator for the period of first quarter 2008 through the fourth quarter 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's operator narrative logs, issue reports, event reports and NRC integrated inspection reports for the period of January 1, 2008, through December 31, 2008, to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one unplanned scrams per 7000 critical hours sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.3 Unplanned Scrams with Complications

a. Inspection Scope

The inspectors sampled licensee submittals for the Unplanned Scrams with Complications performance indicator for the period of first quarter 2008 through the fourth quarter 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's operator narrative logs, issue reports, event reports and NRC integrated inspection reports for the period of January 1, 2008, through December 31, 2008, to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one unplanned scrams with complications sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.4 Unplanned Transients per 7000 Critical Hours

a. Inspection Scope

The inspectors sampled licensee submittals for the Unplanned Transients per 7000 Critical Hours performance indicator for the period of first quarter 2008 through the fourth quarter 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's operator narrative logs, issue reports, maintenance rule records, event reports and NRC integrated inspection reports for the period of January 1, 2008, through December 31, 2008, to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one unplanned transient per 7000 critical hours sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.5 Reactor Coolant System Specific Activity

a. Inspection Scope

The inspectors sampled licensee submittals for the Reactor Coolant System Specific Activity performance indicator for the period of first quarter 2008 through the fourth quarter 2008. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's reactor coolant system chemistry samples, technical specification requirements, issue reports, event reports and NRC integrated inspection reports for the period of January 1, 2008, through December 31, 2008 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. In addition to record reviews, the inspectors observed a chemistry technician obtain and analyze a reactor coolant system sample. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one reactor coolant system specific activity sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.6 Reactor Coolant System Leakage

a. Inspection Scope

The inspectors sampled licensee submittals for the Reactor Coolant System Leakage performance indicator for the period of first quarter 2008 through the fourth quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, performance indicator definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used. The inspectors reviewed the licensee's operator logs; reactor coolant system leakage tracking data, issue reports, event reports and NRC integrated inspection reports for the period of first quarter 2008 through the fourth quarter 2009 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one reactor coolant system leakage sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

40A2 Identification and Resolution of Problems (71152)

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness, Public Radiation Safety, Occupational Radiation Safety, and Physical Protection

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As part of the various baseline inspection procedures discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that they were being entered into the licensee's corrective action program at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. The inspectors reviewed attributes that included: the complete and accurate identification of the problem; the timely correction, commensurate with the safety significance; the evaluation and disposition of performance issues, generic implications, common causes, contributing factors, root causes, extent of condition reviews, and previous occurrences reviews; and the classification, prioritization, focus, and timeliness of corrective actions. Minor issues entered into the licensee's corrective action program because of the inspectors' observations are included in the attached list of documents reviewed.

These routine reviews for the identification and resolution of problems did not constitute any additional inspection samples. Instead, by procedure, they were considered an integral part of the inspections performed during the quarter and documented in Section 1 of this report.

b. Findings

No findings of significance were identified.

.2 Daily Corrective Action Program Reviews

a. Inspection Scope

In order to assist with the identification of repetitive equipment failures and specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into the licensee's corrective action program. The inspectors accomplished this through review of the station's daily corrective action documents.

The inspectors performed these daily reviews as part of their daily plant status monitoring activities and, as such, did not constitute any separate inspection samples.

b. Findings

No findings of significance were identified.

.3 Semi-Annual Trend Review

a. Inspection Scope

The inspectors performed a review of the licensee's corrective action program and associated documents to identify trends that could indicate the existence of a more significant safety issue. The inspectors focused their review on repetitive equipment issues, but also considered the results of daily corrective action item screening discussed in Section 4OA2.2, above, licensee trending efforts, and licensee human performance results. The inspectors nominally considered the 6-month period of July 1, 2008 through December 31, 2008, although some examples expanded beyond those dates where the scope of the trend warranted.

The inspectors also included issues documented outside the normal corrective action program in major equipment problem lists, repetitive and/or rework maintenance lists, departmental problem/challenges lists, system health reports, quality assurance audit/surveillance reports, self-assessment reports, and Maintenance Rule assessments. The inspectors compared and contrasted their results with the results contained in the licensee's corrective action program trending reports. Corrective actions associated with a sample of the issues identified in the licensee's trending reports were reviewed for adequacy.

These activities constitute completion of one single semi-annual trend inspection sample as defined in Inspection Procedure 71152-05.

b. Findings

No findings of significance were identified.

4 Selected Issue Follow-up Inspection

a. Inspection Scope

During a review of items entered in the licensee's corrective action program, the inspectors recognized a corrective action item documenting water leaking through the ceiling of the Diesel Generator 1 room (Room 63) which is located directly below the Turbine Building Mechanical Equipment room (Room 82).

These activities constitute completion of one in-depth problem identification and resolution sample as defined in Inspection Procedure 71152-05.

b. Findings

Introduction. A Green self-revealing noncited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," was identified for the licensee's failure to take prompt corrective measures after identifying that water could penetrate cracks in the turbine building concrete floor and adversely impact the operability of an emergency diesel generator and safety related switchgear. Cracks in the floor of turbine building mechanical equipment room were identified in February 2006, when water was observed leaking into the Diesel Generator 1 room (Room 63). The licensee took no immediate corrective actions to evaluate or repair the cracks. In February 2009, water was again observed leaking into Room 63, resulting in unexpected tripping of breakers associated with the Diesel Generator 1, secondary compressor motor starter.

Description. On February 11, 2009, maintenance workers were removing tags for maintenance on Diesel Generator 1, and determined that three breakers associated with the secondary air compressor had tripped. Investigation revealed that arcing on the power leads had occurred due to the introduction of water into the breakers from the ceiling of the Diesel Generator 1 room (Room 63). The source of the water was standing water on the floor of the turbine building mechanical equipment room (Room 82), which is located directly above Room 63 (as well as the Diesel Generator 2 room, and the east and west Switchgear rooms). After the water was removed from the floor of Room 82, several cracks were evident in the floor, which provided a path of water from Room 82 to Room 63.

The inspectors' review of corrective action documents determined that a condition report was created (CR 200600399) which documented an event that occurred on February 1, 2006. That event also involved water flowing through the ceiling of Room 63 near the area of the starting air compressors. The condition report was classified as a Condition Level 6, which was the lowest condition report classification. The condition report was closed to a work request since "equipment is not an SSC [structures systems and components]." The resulting work order applied caulking to certain areas of the floor in Room 82, but did not address all of the floor cracks or the potential impact on safety-related equipment. The licensee's failure to recognize that cracks in the floor of Room 82 could impact the operability of the diesel generators resulted in an improper classification of the condition report, limiting the review and depth of subsequent corrective actions. The corrective actions that followed were inadequate to ensure a watertight surface between Room 82 and all the rooms located below it.

Analysis. The inspectors determined that the failure to take prompt corrective actions to address a condition adverse to quality was a performance deficiency. This finding was more than minor because the failure to perform adequate corrective actions on the turbine building floor, if left uncorrected, could become a more serious safety concern. Specifically, water

could seep through the floor and render the emergency diesel generator and/or safety related switchgear inoperable. Using the Manual Chapter 0609, "Significance Determination Process," Attachment 4 "Phase 1 - Initial Screening and Characterization of Findings," this finding was of very low safety significance because it: 1) was confirmed to result in a loss of functionality of the secondary compressor motor starter; 2) did not represent a loss of safety function; 3) did not result in a loss of a technical specification required train for more than its allowed outage time; 4) did not result in a loss of risk significant equipment for more than 24 hours; and 5) did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding did not have a crosscutting aspect because the performance deficiency was aged and not indicative of current licensee performance.

Enforcement. Title 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. Contrary to the above, in February, 2006, the licensee failed to promptly correct a condition adverse to quality (cracks in the turbine building mechanical equipment room floor). The cracks were a condition adverse to quality because they permitted water to leak on to safety related equipment, which could challenge safety related equipment operability. The licensee entered this issue into their corrective action program as Condition Report 2009-0687.

Because this finding was of very low safety significance and has been entered into the corrective action program as Condition Report 2009-0687, this violation is being treated as a noncited violation, consistent with section VI.A of the NRC Enforcement Policy: NCV 05000285/2009002-01, Failure to Implement Adequate Corrective Action for Floor Cracks.

40A3 Event Follow-up (71153)

.1 (Closed) Licensee Event Report (LER) 05000285/2008001-02, Reactor Trip Due to Turbine Control System Failure

On March 15, 2008, a circuit board in the electro-hydraulic control system of the main turbine failed. This failure caused turbine control Valves CV-1 and CV-3 to shut and resulted in a reactor trip due to the loss of load. The failed turbine control system component was replaced. Postmaintenance testing was performed to ensure reliable operation of the system and the plant returned to full power. Revision 0 of this LER was closed in NRC Inspection Report 05000285/2008003 and Revision 1 of this LER was closed in NRC Inspection Report 05000285/2008005. The current revision of this LER was reviewed by the inspectors and no findings of significance were identified, and no violation of NRC requirements occurred. The licensee documented the failed equipment in Condition Report 2008-1592. This LER is closed.

.2 (Closed) LER 05000285/2008003-00, Loss of Containment Integrity due to a Leaking Isolation Valve

On November 11, 2008, the licensee confirmed that on March 21, 2008, the plant was in a configuration without satisfying the requirements of a technical specification action statement. While the steam driven auxiliary feedwater Pump FW-10 was declared inoperable for maintenance, emergency diesel generator 1 was subsequently declared inoperable. This condition rendered the motor-driven auxiliary feedwater Pump FW-6 inoperable since the conditions of Technical Specification 2.0.1(2) could not be satisfied. The LER was reviewed by the inspectors, and one finding of significance was identified for failure to comply with

Technical Specification 2.0.1(2). This finding was dispositioned in NRC Inspection Report 05000285/2008-005 as NCV 05000285/2008005-01. This LER is closed.

.3 (Closed) LER 05000285/2009001-00, Failure to Monitor Waste Gas Transfer Due to Operator Error

On January 12, 2009, waste gas was pumped from the vent header to waste gas decay Tank WD-29B. The waste gas analyzer was aligned to sample waste decay Tank WD-29D. Technical Specification 2.9 required that waste gas be transferred to the waste gas decay tank being sampled. After discovering that the waste gas has been pumped to the wrong tank, samples were taken on the correct waste decay tank and confirmed that concentrations of hydrogen and oxygen were below the flammability limits of the gases. This violation of technical specification was of minor significance because the performance deficiency had no safety consequences. This LER is closed.

40A5 Other Activities

.1 Quarterly Resident Inspector Observations of Security Personnel and Activities

a. Inspection Scope

During the inspection period, the inspectors performed observations of security force personnel and activities to ensure that the activities were consistent with Fort Calhoun security procedures and regulatory requirements relating to nuclear plant security. These observations took place during both normal and off-normal plant working hours.

These quarterly resident inspector observations of security force personnel and activities did not constitute any additional inspection samples. Rather, they were considered an integral part of the inspectors' normal plant status review and inspection activities.

b. Findings

No findings of significance were identified.

40A6 Meetings

Exit Meeting Summary

On April 20, 2009, the inspectors presented the inspection results to Mr. J. Reinhart, Site Vice President, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

M. Anderson, Supervisor, Radwaste
R. Clemens, Division Manager, Nuclear Engineering
P. Cronin, Manager, Operations
M. Frans, Manager System Engineering
J. Gasper, Design Engineering
D. Guinn, Supervisor, Regulatory Compliance
R. Haug, Manager, Integrated Work Management
R. Hodgson, Manager, Radiation Protection
T. Matthews, Manager, Licensing
T. Nellenbach, Division Manager, Nuclear Operations/Plant Manager
T. Pilmaier, Manager, Performance
J. Reinhart, Vice President
T. Uehling, Manager, Chemistry

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000285/2009002-01	NCV	Failure to Implement Adequate Corrective Action for Floor Cracks
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Closed

05000285/2008001-02	LER	Reactor Trip Due to Turbine Control System Failure
05000285/2008003-00	LER	Loss of Containment Integrity due to a Leaking Isolation Valve
05000285/2009001-00	LER	Failure to Monitor Waste Gas Transfer Due to Operator Error

LIST OF DOCUMENTS REVIEWED

Section 1RO1: Adverse Weather Protection

DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
AOP-1	Acts of Nature	23
OI-EW-1	Extreme Weather	15

Section 1RO4: Equipment Alignment

DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
OI-AFW-1	Auxiliary Feedwater Actuation System Normal Operation	71
OI-FW-1	Condensate System Normal Operation	55
OI-FW-2	Feedwater System Normal Operation	36
OI-RW-1	Raw Water System Normal Operation	86
11405-M-252	Composite Flow Diagram Main Steam P & ID [Piping and Instrumentation Diagram]	40
11405-M-252	Composite Flow Diagram Main Steam P & ID, Sheet 1	100
11405-M-252	Composite Flow Diagram Main Steam P & ID, Sheet 2	13
11405-M-252	Composite Flow Diagram Main Steam P & ID, Sheet 3	22
11405-M-253	Composite Flow Diagram Steam Generator Feedwater and Blowdown P & ID, Sheet Cov	46
11405-M-253	Composite Flow Diagram Steam Generator Feedwater and Blowdown P & ID, Sheet 1	92
11405-M-253	Composite Flow Diagram Steam Generator Feedwater and Blowdown P & ID, Sheet 2	24
11405-M-253	Composite Flow Diagram Steam Generator Feedwater and Blowdown P & ID, Sheet 3	16
11405-M-253	Composite Flow Diagram Steam Generator Feedwater and Blowdown P & ID, Sheet 4	39
11405-M-254	Composite Flow Diagram Condensate P & ID, Sheet Cov	51
11405-M-254	Composite Flow Diagram Condensate P & ID, Sheet 1	93

DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
11405-M-254	Composite Flow Diagram Condensate P & ID, Sheet 2	36
11405-M-254	Composite Flow Diagram Condensate P & ID, Sheet 3	16
11405-M-254	Composite Flow Diagram Condensate P & ID, Sheet 4	28
11405-M-100	Raw Water Flow Diagram P & ID	95

Section 1RO5: Fire Protection

DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
AOP-6	Fire Emergency	21
EA-FC-97-001	Fire Hazards Analysis Manual	14
SO-G-28	Station Fire Plan	75
SO-G-58	Control of Fire Protection System Impairments	36
SO-G-91	Control and Transportation of Combustible Materials	25
SO-G-102	Fire Protection Program Plan	8
SO-G-103	Fire Protection Operability Criteria And Surveillance Requirements	22
USAR 9.11	Updated Safety Analysis Report Fire Protection Systems	N/A

Section 1RO6: Flood Protection Measures

NRC Information Notice 2003-08, "Potential Flooding Through Unsealed Concrete Floor Cracks"

Root Cause Analysis Report for Condition Report 2009-0687, "Unanalyzed Condition Resulting From Flooding in Room 82," Revision 0

White Paper, "Evaluation of Ceiling Cracks in DG and Switchgear Rooms," March 30, 2009

Section 1R11: Licensed Operator Requalification Program

Open Simulator Discrepancy Reports (All)

Current Simulator Differences List

Simulator Modification Procedures

Verification and Validation Procedures

Current operator license list from Fort Calhoun Station

Licensed Operator Re-qualification Schedule for the week of February 16, 2009

Simulator Scenario Guide 84206a, "SBO – After EOP-1 Entry – 345 kV Recovery," Revision 1

Section 1R12: Maintenance Effectiveness

CORRECTIVE ACTION DOCUMENT NAME

2009-0268

Section 1R13: Maintenance Risk Assessment and Emergent Work Controls

DOCUMENTS

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
ANSI N18.7	Administrative Controls for Nuclear Power Plants	1972
SO-M-100	Conduct of Maintenance	49
N/A	Risk evaluation and risk management actions for week of January 5, 2009	N/A
N/A	Risk evaluation and risk management actions for week of February 9, 2009	N/A
N/A	Risk evaluation and risk management actions for week of March 2, 2009	N/A
N/A	Risk evaluation and risk management actions for week of March 23, 2009	N/A
N/A	Control Room Operating Logs	N/A

Section 1R15: Operability Evaluations

CONDITION REPORTS

200600399 2008-2842 2009-0023 2009-0146 2009-0641
2009-0905

DOCUMENTS

NUMBER

FC-1271 "IST Valve Alert Range Evaluation," Revision 4
EA-96-134 White Paper, "Engineering Evaluation of Snubber SIS-185"

Breaker coordination diagram, MCC-3B1- G04R, dated February 12, 2009

Photographs taken of the ceilings of the following rooms (DG-1, DG-2, both 4160 Volt Switchgear Rooms)

Drawing B120F15501, "Emergency Generators Aux. Systems Single Line," Revision 9

Drawing B120F15503, "Emergency Generators 480 VAC Auxiliary Systems," Revision 16

Control Room Operating Logs dated February 11, 2009

Procedure ARP-AI-30A/A30, "Annunciator Response Procedure," Revision 30

Work Order Package 00265191, "Replace All DP1-D1 Breakers,"

Section 1R19: Postmaintenance Testing

PROCEDURES

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
OP-ST-RW-3002A	Raw Water System Category A and B Valve Exercise Test	12
OP-ST-RW-3002B	Raw Water System Category A and B Valve Exercise Test	8
OP-ST-RW-3011	AC-10B Raw Water Pump Quarterly Inservice Test	32
OP-ST-AFW-3004	Auxiliary Feedwater Pump FW-10 Operability Test	26
OP-ST-VX-3017A	Raw Water System Remote Position Indicator Verification Surveillance Test	4
OP-PM-AFW-0004	Third Auxiliary Feedwater Pump Operability Verification	32

WORK REQUEST

133183

WORK ORDER

316996 320412 327619

Section 1R22: Surveillance Testing

DOCUMENTS

<u>TITLE</u>	<u>REVISION / DATE</u>
Surveillance Test OP-ST-AFW-3009, "Auxiliary Feedwater Pump FW-6, Recirculation Valve, and Check Valve Tests,"	15
Surveillance Test EM-ST-ESF-0002, "13.8 kV Emergency Power Periodic Tests,"	2

WORK ORDER

00318143-01

Section 1EP6: Drill Evaluation

DOCUMENTS

<u>TITLE</u>	<u>REVISION</u>
Simulator Scenario Guide 82109c-1, "SBO Due to Load Rejection,"	0

Section 40A1 Performance Indicator Verification

DOCUMENTS

<u>TITLE</u>	<u>REVISION</u>
MSPIBD, "Mitigating Systems Performance Index Basis Document for Fort Calhoun Station,"	1
NEI 99-02, "Regulatory Assessment Indicator Guideline,"	5
Various Operator logs dated January 1, 2008 through December 31, 2008	N/A
Procedure NOD-QP-37, "Performance Indicators Program,"	18

40A2 Identification and Resolution of Problems

CONDITION REPORTS

200502587	2008-2625	2008-3506	2009-0619	200603685
200600390	200403786	2007-3895	2008-4560	200503043
200605066	200404422	200502211	200600805	