UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

February 13, 2020

Ms. Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
3535 Colonnade Parkway
Birmingham, AL 35243

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – INTEGRATED INSPECTION REPORT 05000348/2019004 AND 05000364/2019004 AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION REPORT 07200042/2019003 AND 07200042/2019002

Dear Ms. Gayheart:

On December 31, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Joseph M. Farley Nuclear Plant. On January 21, 2020, the NRC inspectors discussed the results of this inspection with Keith Brown and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Alan J. Blamey, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Docket Nos. 05000348, 05000364 and 07200042
License Nos. NPF-2 and NPF-8

Enclosure:
As stated

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SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – INTEGRATED INSPECTION REPORT 05000348/2019004 AND 05000364/2019004 AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION REPORT 07200042/2019003 AND 07200042/2019002 dated February 13, 2020

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OFFICE	RII/DRP	RII/DRP	RII/DRP	RII/DRP	
NAME	K. Miller	B. Caballero	B. Collins	N. Staples	
DATE	02/03/2020	02/05/2020	02/07/2020	02/11/2020	
OFFICE	RII/DRP	RII/DRP			
NAME	P. Meier	A. Blamey			
DATE	02/11/2020	02/13/2020			

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000348, 05000364, and 07200042
License Numbers:	NPF-2 and NPF-8
Report Numbers:	05000348/2019004, 05000364/2019004, 07200042/2019002 and 07200042/2019003
Enterprise Identifier:	I-2019-004-0027 and I-2019-003-0081 and I-2019-002-0096
Licensee:	Southern Nuclear Operating Co., Inc.
Facility:	Joseph M. Farley Nuclear Plant
Location:	Columbia, AL
Inspection Dates:	October 01, 2019 to December 31, 2019
Inspectors:	B. Caballero, Senior Operations Engineer R. Carrion, Senior Reactor Inspector B. Collins, Senior Reactor Inspector P. Meier, Senior Resident Inspector K. Miller, Resident Inspector
Approved By:	Alan J. Blamey, Chief Reactor Projects Branch 2 Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Joseph M. Farley Nuclear Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
LER	05000364/2019-003-00	LER 2019-003-00 for Joseph M. Farley Nuclear Plant, Unit 2, Manual Reactor Trip due to 2C Reactor Coolant Pump High Vibration Indication	71153	Closed

PLANT STATUS

Unit 1 began the report period in mode 5 for a refueling outage. Following the refueling outage, mode 1 was achieved on October 24 and the unit was synchronized to the grid on October 25. 100 percent rated thermal power (RTP) was achieved on October 29. The unit remained at or near 100 percent RTP level through the end of the report period.

Unit 2 began the report period at approximately 100 percent rated thermal RTP and remained at or near 100 percent RTP through the end of the report 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 plant status activities described in IMC 2515, Appendix D, "Plant Status," and conducted routine reviews using IP 71152, "Problem Identification and Resolution." 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

71111.04Q - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (3 Samples)

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

(1) Unit 1 'A' train A/C distribution and 'A' train emergency diesel generator during the unit 1 refueling outage 'B' train maintenance window on October 7, 2019 (FNP-1-STP-27.1)
(2) Unit 2 'A' train containment spray system alignment during the 'B' train containment spray pump surveillance on November 4, 2019 (FNP-2-SOP-9.0A)
(3) #1 diesel driven fire pump and motor driven fire pump alignment during a #2 diesel driven fire pump planned maintenance outage on December 9, 2019 (Dwg D170366; WO SNC994937)

71111.04S - Equipment Alignment

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

(1) U1 service water system on October 10 to 13, 2019 (Dwg D170119)

71111.05Q - Fire Protection

Quarterly Inspection (IP Section 03.01) (4 Samples)

The inspectors evaluated fire protection program implementation in the following selected areas:

(1) Unit 1 containment (FZ 1-CTMT) on October 20, 2019 (FNP-1-FPP-3)
(2) Unit 1 '1A' 125 VDC switchgear room (FZ 224) on December 11, 2019 (FNP-1-FPP-1.0)
(3) Unit 1 '1B' 125 VDC switchgear room (FZ 226) on December 11, 2019 (FNP-1-FPP-1.0)
(4) Unit 1 '1C' 125 VDC battery charger room (FZ 224) on December 11, 2019 (FNP-1-FPP-1.0)

71111.08P - Inservice Inspection Activities (PWR)

PWR Inservice Inspection Activities Sample (IP Section 03.01) (1 Sample)

The inspectors evaluated pressurized water reactor non-destructive testing by reviewing the following examinations from October 7 - 11, 2019:

(1) Ultrasonic Examination (UT)
  a. Examination of ALA2-4507-1-OE-UT, Tee to Pipe Weld on 10" diameter Residual Heat Removal (RHR) Piping; ASME Class 2 (observed)
  b. Examination of ALA2-4507-2-OE-UT, Pipe to Elbow Weld on 10" diameter RHR Piping; ASME Class 2 (observed)
  c. Examination of ALA2-4507-3-OE-UT, Elbow to Pipe Weld on 10" diameter RHR Piping; ASME Class 2 (observed)
(2) Penetrant Testing (PT)
  a. Examination of ALA1-4304-7-RB, Pipe to Valve Weld on 6" diameter Safety Injection Piping; ASME Class 1 (observed)
(3) Visual Examination (VE)
  a. Examination of ALA1-4304-7-RB, Pipe to Valve Weld on 6" diameter Safety Injection Piping; ASME Class 1 (observed)
(4) Eddy Current Testing (ET)
  a. SG 2A - ET for tubes R1C41 & R3C4, ASME Class 1 (observed)
  b. SG 2B - ET for tubes R1C76 & R2C77, ASME Class 1 (observed)
  c. SG 2C - ET for tubes R38C59 & R1C45, ASME Class 1 (observed)

The Inspectors evaluated the licensee's boric acid corrosion control program performance.

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

Requalification Examination Results (IP Section 03.03) (1 Sample)

The licensee completed the annual requalification operating examinations required to be administered to all licensed operators in accordance with Title 10 of the *Code of Federal Regulations* 55.59(a)(2), "Requalification Requirements," of the NRC's "Operator's Licenses." During the week of November 25, 2019, the inspector performed an in-office review of the overall pass/fail results of the individual operating examinations and the crew simulator operating examinations in accordance with Inspection Procedure (IP) 71111.11, "Licensed Operator Requalification Program." These results were compared to the thresholds established in Section 3.02, "Requalification Examination Results," of IP 71111.11.

(1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam, which the facility licensee completed administering on September 18, 2019.

71111.11Q - Licensed Operator Requalification 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 unit 1 reactor coolant system drain down to the reactor flange in preparation for refueling on October 2, 2019 and during unit 1 reactor startup on October 23, 2019.

71111.12 - Maintenance Effectiveness

Routine Maintenance Effectiveness Inspection (IP Section 02.01) (1 Sample)

The inspectors evaluated the effectiveness of routine maintenance activities associated with the following equipment and/or safety significant functions:

(1) Unit 1 'C' service water pump failure due to maintenance errors during the unit 1 outage in October 2019 and the associated repair in November 2019 (WO SNC1055920).

Quality Control (IP Section 02.02) (1 Sample)

The inspectors evaluated maintenance and quality control activities associated with the following equipment performance activities:

(1) Unit 1 main steam isolation valve overhauls during the refueling outage in October 2019 (WO SNC966900, SNC966902, SNC771090, SNC771103).

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated the risk assessments for the following planned and emergent work activities:

(1) Unit 1 risk associated with the time the 1C service water pump was out of service for replacement from October 21, 2019 to November 8, 2019 (NMP-DP-001).
(2) Risk while the unit '1C' emergency diesel generator was out of service from November 17, 2019 to November 20, 2019 (NMP-DP-001).

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 02.02) (3 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

(1) Portion of debris interceptor inside unit 1 containment removed during mode 3 walk down on September 29, 2019 (CR10650505).
(2) 1E service water pump breaker did not open during the load shed surveillance while in mode 5 on September 30, 2019 (FNP-1-STP-80.15; CR10650998).
(3) Unpinned snubber identified near the regenerative heat exchanger potentially affecting the operability of the residual heat removal system on October 23, 2019 during the unit 1 refueling outage (CR 10658165).

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated the following post maintenance tests:

(1) Unit 1 'B' train residual heat removal pump motor replacement during the unit 1 outage in October 2019 (WO SNC550842)
(2) Unit 1 'A' steam generator outboard MSIV (Q1N11V002A) overhaul during the unit 1 outage in October 2019 (WO SNC966900)
(3) Unit 1 'C' service water pump replacement in November 2019 (WO SNC1055920).
(4) Unit 1 containment tendon (H15AB) field end anchor replacement on November 2019 (WO SNC1020164)

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage Sample (IP Section 03.01) (1 Sample)

(1) Unit 1 refueling outage 29 from September 29, 2019 - October 25, 2019

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (1 Sample)

(1) Unit 2 'B' emergency diesel generator operability test done on October 30, 2019, (FNP-2-STP-80.1)

Containment Isolation Valve Testing (IP Section 03.01) (1 Sample)

(1) Local leak rate testing on the unit 1 containment instrument air inside containment isolation check valve on October 17, 2019, during a refueling outage (WO SNC993450)

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

MS06: Emergency AC Power Systems (IP Section 02.05) (2 Samples)

(1) Unit 1 (October 1, 2018 - September 30, 2019)
(2) Unit 2 (October 1, 2018 - September 30, 2019)

MS07: High Pressure Injection Systems (IP Section 02.06) (2 Samples)

(1) Unit 1 (October 1, 2018 - September 30, 2019)
(2) Unit 2 (October 1, 2018 - September 30, 2019)

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

(1) Unit 1 (October 1, 2018 - September 30, 2019)
(2) Unit 2 (October 1, 2018 - September 30, 2019)

71152 - Problem Identification and Resolution

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

(1) The inspectors reviewed the licensee's corrective action program for potential adverse trends regarding fire pump issues that might be indicative of a more significant safety issue (CR 10666490).

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

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

(1) Unit 1 aggregated operator issues before the October 2019 refueling outage and after the outage to ensure timely resolution based on the safety and risk significance (NMP-OS-006-002).

71153 - Followup of Events and Notices of Enforcement Discretion

Event Report (IP Section 03.02) (1 Samples)

The inspectors evaluated the following licensee event report (LER):

(1) LER 05000364/2019-003-00, Manual Reactor Trip due to 2C Reactor Coolant Pump High Vibration Indication (ADAMS accession: ML191316C570). The inspectors determined that it was not reasonable to foresee or correct the cause discussed in the LER therefore no performance deficiency was identified. The inspectors also concluded that no violation of NRC requirements occurred.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

60853 - On-Site Fabrication of Components and Construction on an ISFSI

On-Site Fabrication of Components and Construction on an ISFSI (1 Sample)

(1) The inspectors conducted a review of licensee and vendor activities in preparation for the concrete placement for the center section of the Independent Spent Fuel Storage Installation (ISFSI) Pads “F” and “G.” The licensee will use the HI-STORM (Holtec International Storage Module) 100 System on the pad. The inspectors walked down the construction area of the ISFSI pad and examined the rebar installation, for compliance to licensee-approved drawings, specifications, procedures, and applicable codes, the certificate of compliance and technical specifications. The inspectors also evaluated the concrete formwork installation for compliance to the licensee-approved drawings. The inspectors interviewed licensee and contract personnel to verify knowledge of the planned work. The inspectors also observed the actual concrete placements for the center section of the ISFSI slabs and observed testing and sample collection by the independent testing laboratory to verify that the work was implemented according to approved specifications and procedures. Later, when the 7- and 28-day compression tests were completed by the independent laboratory, the inspectors reviewed the results to verify that the acceptance criteria were met.

60855.1 - Operation of an Independent Spent Fuel Storage Installation at Operating Plants

Operation of an Independent Spent Fuel Storage Installation at Operating Plants (1 Sample)

(1) Verified that routine activities are performed in accordance with approved procedures and surveillance activities have been conducted at the specified periods on December 10, 2019 (FNP-0-STP-63.7).

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On January 21, 2020, the inspectors presented the integrated inspection results to Keith Brown and other members of the licensee staff.
- On October 10, 2019, the inspectors presented the ISI and SGISI inspection results to Chuck Kharrl, Site Vice President and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.08P	Corrective Action Documents	CR 10491728	Missed NDE on welds	
		CR 10517412	CR is written to I&R a boric acid leak in the U1 121' PPR	
		CR 10539379	U1 CTMT BA Walkdown: Boric Acid Found on Q1B13V094B	
		CR 10539398	U1 CTMT BA Walkdown: Boric Acid Found on valve near Q1E21V536A	
		CR 10551009	ISI Plan revision needed	
		CR 10591502	Weld Procedure Specification Change	
		CR 10599595	ISI Inspections	
		CR 10600957	Unapproved chemical used for purge damns in welding process	
		CR 10602704	Performance Analysis request on ASME Code	
		CR 10608492	CR is written as a tracking item for ISI engineer to ensure a relief request is submitted to the NRC	
		CR 10609029	BACCP Corrosion Assessment Procedure Revision Needed	
		CR 10609031	Boric Acid Corrosion Assessment WELL sheet is needed	
		CR 10628228	Boric Acid Leak on Q1E21MOV8803A	
		CR 10633358	Request re-evaluation of Q1E21V134A Leakage	
		CR 10643619	Boric Acid Found on Q1E21V350	
		CR 10646814	Service Water Piping Through Wall Leak	
		CR 10647009	Boric Acid found on Q1E21P002A	
	Engineering Evaluations	Corrosion Assessment 1B13-2018-001		4/24/2018
		Corrosion Assessment 1B31-2019-001		04/17/2019
		Corrosion Assessment 1E13-2019-001		10/02/2019
		Corrosion		04/16/2019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Assessment 1E21-2019-001		
		Corrosion Assessment 1E21-2019-003		04/21/2019
	Miscellaneous		Krautkramer Transducer Certification for Transducer S/N 00X125	dated 1/17/03
			Framatome Certificate of Personnel Qualification: ET III-QDA (Greene)	January 30, 2019
			Framatome Certificate of Vision Examination (Greene)	January 30, 2019
			Framatome Certificate of Personnel Qualification: ET III-QDA (LaReau)	February 23, 2015
			Framatome Certificate of Vision Examination (LaReau)	July 11, 2019
			NDE Personnel Certification Records for D. Brown and S. Overly	
			Magnaflux Sonotrace 30 Certificate of Certification, Batch #19A061	01/18/2019
			Magnaflux Spotcheck Developer SKD-S2 Certificate of Certification, Batch #15F11K	06/16/2015
			Magnaflux Spotcheck Penetrant SKL-SP2 Certificate of Certification, Batch #14E08K	05/14/2014
			Magnaflux Spotcheck Remover SKC-S Certificate of Certification, Batch #17E21K	05/24/2017
			Olympus Pulse/Receiver Certification; Transducer S/N1161144, Instrumentation – Epoch 600, S/N130521708	dated 06-18-2018
			Certificate of Calibration for IR Thermometer, serial number 19330320, Equipment Number 30006631	8/26/2019
			Krautkramer Transducer Certification for Transducer S/N 00T8K9	dated 2/7/02
			Welder Continuity Logs for C. Hughes	
			Welder Process Qualification Report for C. Hughes	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Procedure Qualification Record B06	GTAW Manual	Revision 0
		Welding Procedure Specification 8.20N	GTAW/Manual	Revision 6
	NDE Reports		Visual Examination of ALA1-4304-7-RB, Pipe to Valve Weld on Safety Injection Piping	10/9/19
		S19F1P001	Liquid Penetrant Examination of ALA1-4304-7-RB, Pipe to Valve Weld on Safety Injection Piping	10/9/19
		S19F1U022	Ultrasonic Examination of ALA2-4507-1-OE-UT, Tee to Pipe Weld on RHR Piping	10/9/19
		S19F1U023	Ultrasonic Examination of ALA2-4507-2-OE-UT, Pipe to Elbow Weld on RHR Piping	10/9/19
		S19F1U024	Ultrasonic Examination of ALA2-4507-3-OE-UT, Elbow to Pipe Weld on RHR Piping	10/9/19
	Procedures	03-1246524	Instructions for Plug Visual Inspection	Rev. 015
		03-1274986	Framatome Site Requirements for Water Lancing	Rev. 010
		03-1275114	Framatome Eddy Current Data Management Guidelines	Rev. 020
		03-9293806	Framatome Farley Unit 1 and Unit 2 Steam Generator Eddy Current Data Analysis Guidelines	Rev. 000
		03-9300210	Framatome Secondary Side Visual Inspection Plan for Joseph M. Farley Unit 1 R29	Rev. 000
		51-9300171	Framatome Engineering Information Record: Farley Unit 1 1R29 SG ECT Inspection Plan	Rev. 000
		FNP-0-ETP-019.0	Leakage Assessment Program	Version 2.0
		NMP-ES-019	Boric Acid Corrosion Control Program	Version 11.1
		NMP-ES-019-001	Boric Acid Corrosion Control Program Implementation	Version 11.1
		NMP-ES-019-003	Boric Acid Deposit Sampling, Analysis and Data Evaluation	Version 2.1
		NMP-ES-019-004	Boric Acid Corrosion Control Program - Corrosion Assessment	Version 5.1
		NMP-ES-024-301	Liquid Penetrant Examination Color Contrast and Fluorescent	Version 13.1
		NMP-ES-024-501	PDI Generic Procedure for the Ultrasonic Examination of	Version 7.0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Austenitic Pipe Welds (Appendix VIII)	
		NMP-MA-013	Leak Management Program	Version 14.1
	Work Orders	SNC971494	*OHI – (Pri 2 CA) U1 CTMT BA Walkdown: Boric Acid Found on Q1B13V094B	
60853	Corrective Action Documents	CR10528286	ISFSI Expansion Project Site Preparation Tasks Delayed Due to 1-2A EDG Outage	
		CR10570292	ISFSI Expansion Construction Area Boundary Violations	
	Drawings	SNC883674C104	ISFSI Storage Facility – Excavation and Backfill – Plan & Sections	Version 1.0
		SNC883679C104	ISFSI Expansion Storage Pads “F” and “G” – Site Layout Plan	Version 1.0
		SNC883679C200	ISFSI Expansion Storage Pads “F” and “G” – Neat Line	Version 1.0
		SNC883679C201	ISFSI Expansion Storage Pads “F” and “G”, - Section, Details & Reinforcing	Version 1.0
		SNC883679C202	ISFSI Expansion Storage Pads “F” and “G”, -Subsurface Profile and Details	Version 1.0
		SNC883679C413	ISFSI Storage Facility General Arrangement	Version 1.0
		SNC883679C415	ISFSI Storage Facility - Miscellaneous Pads Location – Plan	Version 1.0
		SNC883679C417	ISFSI Storage Facility - Finished Surface Aggregate Plan	Version 1.0
		SNC883679C418	ISFSI Storage Facility – Fence and Gate Location Plan	Version 1.0
		SNC883679SKC001	Independent Spent Fuel Storage Installation (ISFSI) Expansion Final Site Layout	Version 1.0
	Engineering Changes	DCP SNC883679	ISFSI Storage Pad	Revision 2.0
		Field Change Request Number SNC883679FCR01	ISFSI Project Requested Changes	Revision 1.0
	Engineering Evaluations		10 CFR 50.59 Screening for DCP SNC883679, ISFSI Storage Pad	Version 1.0
			10 CFR 72.48 Screening for DCP SNC883679, ISFSI Storage Pad	Version 1.0
			Applicability Determination for DCP SNC883679, ISFSI Storage Pad	Version 1.0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		SNC88367972.48	10 CFR 72.48 Screening for ISFSI Pad (DCP SNC883679)	
	Miscellaneous	SNC883679SKC005	Configuration Control Activity Worksheet	Version 1.1
	Procedures	BG-QC-C-0001	Construction QC Procedure, Structural Concrete Placement	Revision 0
		BG-QC-C-0002	Construction QC Procedure, Structural Concrete Activities	Revision 0
		BG-QC-C-0003	Construction QC Procedure, Concrete Sampling & Testing	Revision 0
		BG-QC-E-0001	Construction QC Procedure, Earthwork	Revision 0